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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Implementation and Administration of California Renewables Portfolio Standard Program.	Rulemaking 08-08-009 (Filed August 21, 2008)

AMENDED SCOPING MEMO AND RULING OF ASSIGNED COMMISSIONER REGARDING 2010 RPS PROCUREMENT PLANS

This Amended Scoping Memo and Ruling establishes the scope and schedule for Commission consideration of 2010 Renewables Portfolio Standard (RPS) Procurement Plans (Plans).[1] It first discusses a possible streamlined approach for presentation and consideration of 2010 RPS Plans. That discussion is followed by a description of information that must be filed by five RPS-obligated load serving entities (LSEs), and the schedule for this portion of the proceeding.[2]

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[1] The Commission adopted the basic approach for consideration of 2010 RPS Procurement Plans, with the schedule and other details to be set by the assigned Commissioner or Administrative Law Judge (ALJ). (*See* Decision (D.) 09-06-018 at 70, Ordering Paragraph (OP) 6, and Item 15.b at A-6; also see Pub. Util. Code § 399.11 *et seq.*)

[2] Most LSEs (including electric service providers, community choice aggregators, Bear Valley Electric Service and Mountain Utilities) are subject to five specific elements of the RPS Program but are not required to file a procurement plan for Commission review. (See Pub. Util. Code § 399.14(c); D.05-11-025, OP 1; D.06-10-019; D.08-05-029 at 17.) PacifiCorp and Sierra Pacific Power Company (Sierra) are subject to the same specific elements but must each file either (a) an Integrated Resource Plan (IRP), with a

Footnote continued on next page

1. Scope and Potential for Streamlined Approach

Preparation and review of 2010 RPS Procurement Plans can potentially be reasonably streamlined, given that respondents, parties, RPS developers and the Commission have nearly a decade of experience with the RPS program and various proposed and final RPS Plans.[3] In its orders, the Commission has encouraged respondents to simplify, harmonize, and make documents more uniform, to the extent feasible, while streamlining development, review and implementation of RPS Procurement Plans. Progress has been made on those goals. For 2010, no major changes are required of the RPS program by new legislation. No new issues have been identified by the Commission for inclusion in 2010 Plans.[4] I do not propose that parties address any complex new issues.

While the Commission encourages continued simplification, uniformity, streamlining and efficiency in both the documents and the overall process, there may be times when detailed work is necessary. This may occur, for example, when it is necessary to consider such things as: new laws, goals, policies, or procedures; substantial refinements in development and implementation of RPS Plans; additional coordination with other proceedings at the Commission or

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Supplement 30 days thereafter, in years in which an IRP is filed; or (b) a comprehensive Supplement in years in which an IRP is not filed. (See D.08-05-029, OPs 10-13.)

[3] This more recent experience is supplemented by substantial experience beginning in the early 1980's of utility procurement from alternative suppliers, including qualifying facilities (many of whom also being RPS-eligible facilities). Utilities and parties have also had considerable experience since the late 1990's with procurement from merchant generators pursuant to electric industry restructuring.

[4] For example, last year the Commission identified issues related to the Sunrise Powerlink Transmission Project for inclusion in the 2009 RPS Procurement Plans. (D.08-12-058.)

other agencies; and/or further integration of RPS procurement with long-term planning.

Now, however, unless a significant change is proposed by a utility, it is probable that each of the five RPS-obligated LSEs may want to propose continuation of its accepted 2009 Plan or Supplement with only relatively minor updates or changes. This approach should also work absent comment by a party on a proposed Plan or Supplement that raises an issue requiring more comprehensive review. This streamlined approach is described below for each group of utilities after a brief description of the more comprehensive regular approach, including a description of the required information.

2. Investor-Owned Utilities

The three largest investor-owned utilities (IOUs) are Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company (SDG&E). Each IOU, before commencing RPS procurement, must file a proposed RPS Procurement Plan. (Pub. Util. Code § 399.14(c).) Each proposed 2010 RPS Plan must be complete, and in the exact form and format in which each IOU seeks its acceptance by the Commission.

The Plan must include an assessment of supplies and demand, a discussion of the use of flexible compliance, a bid solicitation, and certain other items. (Pub. Util. Code § 399.14(a)(3).) The Commission continues to encourage utilities to make incremental improvements in form and format in order to simplify and streamline each document, and make the three Plans reasonably uniform. (See D.09-06-018 at 52-53.) Further details are in Attachment A.

For 2010, I anticipate that the necessary information may be relatively brief. That is, by Assigned Commissioner Ruling dated April 29, 2009, the draft 2009 Transmission Ranking Cost Reports (TRCRs) were accepted for use with the

2009 Plans. On June 4, 2009, the Commission conditionally accepted the IOU 2009 Plans. (D.09-06-018.) Given continuous changes in the transmission system, IOUs will need to update TRCRs. If an IOU proposes no significant changes from the most recently accepted RPS Procurement Plan, however, the IOU may file a statement that there are no significant proposed changes. The IOU should include an appendix showing limited, minor proposed updates or changes, if any, and addressing limited items raised in D.09-06-018 or herein. The areas for updates, changes or limited items include: proposed 2010 schedule, Imperial Valley bidders conference, Imperial Valley 2010 remedial measures, SDG&E time-of-use factors, process for consideration of RPS contract amendments, and other. (See Attachment A for details.)

3. Multi-Jurisdictional Utilities

The two multi-jurisdictional utilities (MJUs) are PacifiCorp and Sierra. Each MJU must file either (a) an IRP, with Supplement 30 days thereafter, or (b) a comprehensive Supplement at the same time the IOUs file RPS procurement plans. (D.08-05-029.)

PacifiCorp filed its 2008 IRP on May 29, 2009,[5] and Supplement on June 29, 2009. To complete its showing for 2010, PacifiCorp must file either (a) an additional Supplement (2010 Supplement) to address issues raised herein if PacifiCorp determines that further information not currently in its 2008 IRP or June 29, 2009 Supplement is necessary to present and explain its 2010 RPS Program or (b) a statement that its 2008 IRP and June 29, 2009 Supplement

[5] By transmittal letter dated May 20, 2009, PacifiCorp states that its 2008 IRP fulfills the requirement to file a 2009 IRP in calendar year 2009, as specified, according to PacifiCorp, in Appendix A of D.08-05-029.

completely address its 2010 RPS Plan obligations and no additional 2010 Supplement is necessary.

Sierra last filed an IRP in 2007. On June 4, 2009, the Commission accepted Sierra's 2009 Supplement. (D.09-06-018.) Sierra must file either (a) a comprehensive 2010 Supplement or (b) a statement that there are no significant changes from Sierra's most recently accepted 2009 Supplement, with an appendix limited to showing minor updates or changes, if any.

Each filed document must be complete, and in the exact form and format in which the MJU seeks its acceptance by the Commission. MJUs should make their pleadings as uniform as reasonably possible. Further details are in Attachment B.

4. Comments and Decision

Respondents and parties may file comments, reply comments and other pleadings. The schedule for this work is in Attachment C.

After review, the Commission must accept, modify, or reject each Plan and Supplement. (Pub. Util. Code §§ 399.14(a)(1) and (c).) The decision doing so will consider the entire record (including, for example, all items provided pursuant to Attachments A and B, comments, replies), but will address only the matters necessary to reach a decision.

IT IS RULED that:

1. Southern California Edison Company, Pacific Gas and Electric Company, and San Diego Gas & Electric Company, shall each file and serve, as further described below, either (a) a proposed 2010 Renewables Portfolio Standard (RPS) Procurement Plan (2010 Plan) or (b) a document describing limited items.

    a. 2010 Plan: Each 2010 Plan shall address the elements stated in Attachment A. Each 2010 Plan shall contain one or more documents which, in total, comprise the complete 2010 Plan.

Each utility shall also file and serve a draft Transmission Ranking Cost Report (TRCR). Utilities shall make reasonable incremental improvements in form and format to streamline documents, while making the solicitation documents more uniform among the three utilities. The documents shall be filed and served by the dates in Attachment C.

b. Limited Items: Each utility must update its TRCR. If the utility has no significant changes to propose to its accepted 2009 Procurement Plan, however, the utility shall file a document stating that it proposes continued use of its Commission-accepted 2009 Plan with no significant changes. With that document, the utility shall include an appendix showing limited proposed minor updates or changes, if any, and addressing limited items raised in Decision (D.) 09-06-018 and herein. The areas for updates, changes or limited items are described in Attachment A.

2. PacifiCorp shall file and serve either (a) an additional Supplement (2010 Supplement) to its 2008 Integrated Resource Plan (IRP) and June 29, 2009 Supplement to complete its 2010 Plan showing, or (b) a statement that its 2008 IRP and June 29, 2009 Supplement completely address its 2010 RPS Plan obligations and no additional 2010 Supplement is necessary to fully explain its 2010 RPS Plan. As appropriate, the pleading shall address the elements required in D.08-05-029 and those stated in Attachment B.

3. Sierra Pacific Power Company shall file and serve either (a) a comprehensive Supplement (2010 Supplement) to its 2007 IRP or (b) a document stating it proposes no significant changes from its accepted 2009 Supplement, with an appendix stating any other limited proposed minor updates or changes, if any. As appropriate, the pleading shall address the elements required in D.08-05-029 and those stated in Attachment B.

4. Respondent utilities and parties may file and serve comments, reply comments, motions and other pleadings by the dates in Attachment C.

5. The schedule in Attachment C is adopted.

6. The categorization for this matter remains ratesetting, the Principal Hearing Officers continue to be Administrative Law Judges Burton W. Mattson and Anne E. Simon, and all other matters not specifically addressed in this amended ruling remain as scoped in the "Scoping Memo and Ruling of Assigned Commissioner" dated September 26, 2008.

Dated November 2, 2009, at San Francisco, California.

MICHAEL R. PEEVEY

Michael R. Peevey
Assigned Commissioner

ATTACHMENT A

2010 RPS PROCUREMENT PLANS FOR IOUS

San Diego Gas & Electric Company (SDG&E), Southern California Edison Company, and Pacific Gas and Electric Company (collectively IOUs) shall each file and serve a 2010 Renewables Portfolio Standard (RPS) Procurement Plan (2010 Plan) by the date stated in Attachment C. Each Plan shall be in the form and format in which each IOU seeks its acceptance by the Commission. IOUs are strongly encouraged to use the same form and format, and make improvements in model contracts, so that each RPS Plan is reasonably easy to review and use by all parties, bidders and the Commission, and reasonably uniform among IOUs. Alternatively, each IOU may propose continued use of its accepted 2009 Plan with limited updates or changes. The complete plan is described first, followed by the limited option alternative.

1. COMPLETE 2010 PLAN

Each Plan shall be composed of one or more documents that comprise each IOU's complete 2010 RPS Procurement Plan.[1] It shall include solicitation document(s), model contract(s), description of the least cost-best fit (LCBF) process, updated transmission information, and other information described below.

[1] The Commission is required to direct each electrical corporation to prepare a renewables energy procurement plan that includes, but is not necessarily limited to, a bid solicitation. The Commission expects each Plan to be inclusive and comprehensive. It should include everything an electrical corporation reasonably intends to use to satisfy its obligations under the renewables procurement standard. (Pub. Util. Code § 399.14(a)(1).)

Each Plan shall be consistent with requirements of the Public Utilities Code and Commission decisions including, but not limited to, the following:

> "Consistent with the goal of procuring the least-cost and best-fit eligible renewable energy resources, the renewable energy procurement plan submitted by an electrical corporation shall include all of the following:
>
> (A) An assessment of annual or multiyear portfolio supplies and demand to determine the optimal mix of eligible renewable energy resources with deliverability characteristics that may include peaking, dispatchable, baseload, firm, and as-available capacity.
>
> (B) Provisions for employing available compliance flexibility mechanisms established by the commission.
>
> (C) A bid solicitation setting forth the need for eligible renewable energy resources of each deliverability characteristic, required online dates, and locational preferences, if any." (Pub. Util. Code § 399.14(a)(3).)

Each Plan shall be the complete procurement plan which each IOU seeks to have approved for the following purpose, such that the Commission may accept or reject proposed contracts based on consistency with the approved plan:

> "The commission shall review the results of an eligible renewable energy resources solicitation submitted for approval by an electrical corporation and accept or reject proposed contracts with eligible renewable energy resources based on consistency with the approved renewable energy procurement plan." (§ 399.14(d).)

Each 2010 Plan shall include, but is not limited to, the following items. It shall include solicitation document(s), such as a request for proposal issued by the IOU to solicit interest from developers. It shall include model contract(s). The model contract(s) shall be for purchases of electricity over both the long-term

(10 years or more) and short-term (less than 10 years).[2] It shall include a description of each utility's current LCBF evaluation and selection process using the template developed by Energy Division, and updated transmission information based on an updated Transmission Ranking Cost Report (TRCR). It shall include all other documents (or references to published, publicly available items) which complete an IOU's overall plan to procure RPS resources for the purpose of satisfying RPS targets (including each annual procurement target, the target of 20% by 2010, and the goal of 33% by 2020). For example, these might include, but are not limited to, documents or references to: (a) standard tariffs to facilitate RPS procurement from eligible customers pursuant to Pub. Util. Code § 399.20, (b) standard tariffs, if any, used to acquire RPS electricity from other customers, (c) biomass standard contracts, and (d) utility-owned RPS-eligible generation. Finally, it shall include anything else reasonably necessary to present a complete Plan. This shall include, but is not limited to, the following information:[3]

1. **Overview:** An assessment and discussion of:
    - 1.1. Supplies and demand to determine the optimal mix of RPS resources (including the analysis used to determine the optimal mix, with the underlying assumptions clearly stated),
    - 1.2. The use of compliance flexibility mechanisms, and
    - 1.3. A bid solicitation setting forth relevant need, online dates, and locational preferences, if any.

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[2] Model contracts for short-term purchases need not be included if the LSE does not intend to solicit bids for short-term RPS electricity.

[3] An electrical corporation may elect not to include an item, but, if excluded, must explain why the item is unnecessary or unreasonable for the 2010 Plan.

2. **Workplan to Reach 20% By 2010 and 33% by 2020:** A showing on each IOU's workplan to reach 20% by 2010, and 33% by 2020,[4] including but not limited to:

    2.1. Identification of any impediments that remain to reaching 20% by 2010, and 33% by 2020, and

    2.2. What the IOU is doing, or plans to do, to address each impediment, if anything.

3. **Build Own Resources:** A showing on the IOU's current consideration of whether or not to build its own renewable generation to reach 20% by 2010, and 33% by 2020.[5] This showing must identify specific projects currently under consideration. It must also identify specific generic additions currently under consideration (e.g., 50 megawatts of utility-owned biomass in 2012, even if the specific location and plant name are unknown). If the IOU has decided not to consider this option, the showing must include the IOU's reasons and justification for that decision.

4. **Imperial Valley Issues**:

    4.1. **Bidders Conference:** A brief report on experience with the 2009 Imperial Valley bidders conference, and recommendation on whether or not the Commission should direct each IOU to conduct another Imperial Valley bidders conference in 2010. (See D.09-06-018 at 11-14, and Item 15.b at A-6.)

    4.2. **Remedial Measures for 2010**: A brief report on Imperial Valley results from the 2009 solicitation, and a recommendation on whether or not the Commission should adopt any remedial measures relative to Imperial Valley for 2010 (e.g., automatic short-listing, Imperial

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[4] See, for example, Energy Action Plan II, Key Action Item 5 at 8; 2008 Energy Action Plan Update at 12-15; Governor's Executive Orders S-14-08 and S-21-09.

[5] See, for example, D.06-05-039 at 33-34; D.07-02-011 at 23-25; D.08-02-008 at 32-35; D.09-06-018 at 48-52.

Valley bid evaluation metric, special Imperial Valley solicitation, other). (See D.09-06-018 at 16-19.)

5. **SDG&E TOU Factors**: If SDG&E has not yet made this showing in another proceeding, SDG&E must explain why it uses an energy-only approach to setting time-of-use (TOU) factors, and provide both energy-only and all-in factors. (See D.09-06-018 at 46-48, and Item 7 at A-3.) If SDG&E has made this showing in another proceeding, SDG&E should provide a reference to that showing.

6. **Contract Amendments**: In draft 2009 RPS Procurement Plans, each IOU provided proposals for the level of Commission review with regard to RPS contract amendments. While the Commission declined in 2009 to adopt specific simplified procedures for review of contract amendments,[6] it continues to be interested in considering ways to streamline this review.[7] Accordingly, respondents and parties should comment on the following proposal:

   Proposal: Commission administration of the consideration and disposition of proposed contract amendments will, to the fullest extent feasible, be parallel to the administration and disposition of proposed contracts. Proposed streamlining (Energy Resource Recovery Account (ERRA) or Tier 1) compared to regular (Tier 3) treatment is:

[6] See D.09-08-018 at 30.

[7] All contract amendments shall continue to be reported and tracked in IOU Project Development Status Reports filed twice a year with Energy Division.

LEVEL OF REVIEW	EXAMPLES OF ELIGIBLE AMENDMENT
Annual ERRA filing	Routine contract administration (e.g., minor modification of project milestones)
Tier 1 Advice Letter	Additional procurement at a Commission-approved price
Tier 3 Advice Letter	All others, including a. Significant aspects of contract administration (e.g., major modification to project milestones) b. Further consideration relative to explicit term of power purchase agreement approval[8] c. Any increase in ratepayer cost that has not been pre-approved

Energy Division is the "gatekeeper" and, just as with contracts, shall screen and separate out contract amendments that require special attention. (See D.07-02-011 at 48-50.) This may include rejecting an advice letter (with instructions that the applicant submit the item as an application if it wishes further review). It may include Energy Division on its own motion converting an advice letter to an application. Conditions under which this might occur include, but are not limited to, when:

a. An advice letter raises potentially disputed, important or significant issues of fact, policy or law;

b. The amended contract price exceeds the relevant market price referent by a nontrivial amount; or

c. Changes to standard terms and conditions raise an important issue.

[8] For example, if the Commission resolution explicitly approves only the first phase of a multi-phase project, applicant must file a Tier 3 advice letter for approval of a subsequent phase.

An applicant may also on its own elect to submit a contract amendment to the Commission by application rather than advice letter.

7. **Other**: Anything else necessary for a full and complete presentation to the Commission of the IOU's 2010 RPS Procurement Plan, as recommended by the IOU for Commission acceptance.
8. **Important Changes**: A statement identifying and summarizing the important changes between the 2009 and 2010 Plans. This might be a table or bullet point presentation. (It should not be a reprint of the two Plans with strike-out and underlined inserts.) In addition to identifying and summarizing the important changes, the Plan should also include a brief explanation and justification for each important change from 2009 to 2010.
9. **Redlined Copy**: A version of the 2010 Plan that is "redlined" to identify the changes from the 2009 Plan, with a copy for Energy Division, the Administrative Law Judge and any party who requests a copy. (This is separate from the Important Changes item above.)

2. CONTINUED USE OF 2009 PLAN WITH LIMITED UPDATES

Each IOU must update its TRCR. If an IOU proposes no significant changes to the most recently accepted RPS Procurement Plan, the IOU may file a statement that it proposes use in 2010 of its accepted 2009 Plan without any significant changes. Limited minor updates and changes, however, along with information on limited items raised in D.09-06-018 and herein, should be stated in an appendix showing, but no necessarily limited to, the following proposed updates, changes and limited items:

1. **Schedule**: proposed schedule for 2010 solicitation.
2. **Imperial Valley Issues:**
   a. **Imperial Valley Bidders Conference**: A brief report on experience with the 2009 Imperial Valley bidders conference, and recommendation on whether or not the Commission should direct each IOU to conduct another Imperial Valley bidders conference in 2010. (See D.09-06-018 at 11-14, and Item 15.b at A-6.)

b. **Remedial Measures for 2010**: A brief report on Imperial Valley results from the 2009 solicitation, and a recommendation on whether or not the Commission should adopt any remedial measures relative to Imperial Valley for 2010 (e.g., automatic short-listing, Imperial Valley bid evaluation metric, special Imperial Valley solicitation, other). (See D.09-06-018 at 16-19.)

3. **SDG&E TOU Factors**: If SDG&E has not yet made this showing in another proceeding, SDG&E must explain why it uses an energy-only approach to setting TOU factors, and provide both energy-only and all-in factors. (See D.09-06-018 at 46-48 and Item 7 at A-3.) If SDG&E has made this showing in another proceeding, SDG&E should provide a reference to that showing.

4. **Contract Amendments:** In draft 2009 RPS Procurement Plans, each IOU provided proposals for the level of Commission review with regard to RPS contract amendments. While the Commission declined in 2009 to adopt specific simplified procedures for review of contract amendments,[9] it continues to be interested in considering ways to streamline this review.[10] Accordingly, respondents and parties should comment on the following proposal:

   Proposal: Commission administration of the consideration and disposition of proposed contract amendments will, to the fullest extent feasible, be parallel to the administration and disposition of proposed contracts. Proposed streamlining (ERRA or Tier 1) compared to regular (Tier 3) treatment is:

[9] D.09-06-018 at 30.

[10] All contract amendments shall continue to be reported and tracked in IOU Project Development Status Reports filed twice a year with Energy Division.

LEVEL OF REVIEW	EXAMPLES OF ELIGIBLE AMENDMENT
Annual ERRA filing	Routine contract administration (e.g., minor modification of project milestones)
Tier 1 Advice Letter	Additional procurement at a Commission-approved price
Tier 3 Advice Letter	All others including: a. Unique aspects of contract administration (e.g., major modification to project milestones) b. Further consideration relative to explicit term of PPA approval[11] c. Any increase in ratepayer cost that has not been pre-approved

Energy Division is the "gatekeeper" and, just as with contracts, shall screen and separate out contract amendments that require special attention. (See D.07-02-011 at pages 48-50.) This may include rejecting an advice letter (with instructions that the applicant submit the item as an application if it wishes further review). It may include Energy Division on its own motion converting an advice letter to an application. Conditions under which this might occur include, but are not limited to when:

a. An advice letter raises potentially disputed, important or significant issues of fact, policy or law;

b. The amended contract price exceeds the relevant market price referent by a nontrivial amount; or

c. Changes to standard terms and conditions raise an important issue.

An applicant may also on its own elect to submit a contract amendment to the Commission by application rather than advice letter.

[11] For example, if the Commission resolution explicitly approves only the first phase of a multi-phase project, applicant must file a Tier 3 advice letter for approval of a subsequent phase.

5. **<u>Other</u>**: Anything else necessary to update and present a complete 2010 RPS Plan.

(END OF ATTACHMENT A)

ATTACHMENT B

2010 RPS PROCUREMENT PLANS FOR MJUS

The Commission accepted the 2007 Integrated Resource Plans (IRPs) of PacifiCorp and Sierra Pacific Power Company (Sierra; collectively MJUs). (Decision (D.) 08-05-029, Ordering Paragraph (OP) 9.) The Commission also accepted MJU Supplements in 2009. (D.09-06-018.)

In years when an IRP is filed, each utility must, within 30 days, also file a supplement to include certain specific information. This shall include information required of the large utilities in their Plans for that year, as set forth by the assigned Commissioner or Administrative Law Judge (ALJ). (D.08-05-029, OP 11.) In years when an IRP is not filed, each utility must file a more comprehensive supplement. (*Id.,* OP 12.) Comprehensive supplements are to be filed at the same time as each large investor-owned utility (IOU) files its RPS procurement plan. (*Id.*, OP 10.) Comprehensive supplements should include:

- an overview of California renewables portfolio standard (RPS) procurement to date;
- projected retail sales out to one year after the next expected IRP;
- plans for flexible compliance and procurement contracting to meet California's RPS;
- workplan to reach 20% by 2010, or any succeeding binding RPS goal;
- any additional information required by the ALJ or assigned Commissioner; and
- any other information the utility deems necessary to provide an accurate and complete picture of their California RPS procurement planning. (*Id.*, OPs 12 and 13.)

PacifiCorp filed its 2008 IRP on May 29, 2009, and a Supplement on June 29, 2009. PacifiCorp shall file and serve either (a) an additional 2010

Supplement to its 2008 IRP and June 29, 2009 Supplement or (b) a statement that its 2008 IRP and June 29, 2009 Supplement completely address its 2010 RPS Plan obligations and no additional 2010 Supplement is necessary to fully explain its 2010 RPS Plan. The additional 2010 Supplement will be filed if PacifiCorp determines that additional information not currently in its 2008 IRP or June 29, 2009 Supplement is necessary to address any item stated above, or would be beneficial in explaining its 2010 RPS Plan. Its IRP, Supplement and additional 2010 Supplement, if any, must comprise its complete showing to include, but is not limited to, items required in D.08-05-029, and a reasonable presentation of PacifiCorp's workplan to reach 20% by 2010. (See D.09-06-018 at 66-69, and Item 13 at A-5.) If its 2008 IRP and June 2009 Supplement are its complete 2010 Plan showing, PacifiCorp will file a statement that these documents are its complete 2010 Plan.

Sierra Pacific Power Company shall file and serve (a) a comprehensive 2010 Supplement to its 2007 IRP or (b) a document stating it proposes no significant changes from its accepted 2009 Supplement, with an appendix stating any other limited proposed minor updates or changes, if any. The comprehensive 2010 Supplement shall state all that is reasonably necessary to present an accurate and complete view of its RPS resources and procurement plan. This shall include, but is not limited to, the items required in D.08-05-029. Sierra may present the information in the Supplement itself, or in accompanying documents, as appropriate and convenient. If Sierra proposes no significant changes from its accepted 2009 Supplement, it will file a document with that

information, and may include an appendix stating other limited proposed minor updates or changes, if any.

(END OF ATTACHMENT B)

ATTACHMENT C

SCHEDULE FOR CONSIDERATION OF 2010 RPS PROCUREMENT PLANS

ITEM	DATE
Amended Scoping Memo and Ruling on 2010 Procurement Plans and TRCRs	11/2/09
Large IOUs send letters to prospective developers requesting information for TRCRs, it needed to update TRCRs	11/20
Large IOUs file and serve 2010 RPS Procurement Plans (complete or limited updates); MJUs file and serve Supplements (comprehensive/additional supplements or statements of limited or no updates)	12/18
Comments filed and served on 2010 RPS Plans and Supplements	1/19/10
Draft TRCRs filed and served	1/20
Reply comments filed and served on 2010 RPS Plans and Supplements	1/26
Motion for hearing filed and served [1]	1/28
Responses to motion for hearing filed and served	2/3
Comments filed and served on draft TRCRs	2/10
Reply Comments filed and served on draft TRCRs	2/17
Motion for final updates to Plans and Supplements [2]	2/17
Projected submission (if no hearing)	2/18
Proposed Decision (PD) on 2010 Plans and Supplements	Qtr 2 2010
ACR on TRCRs	TBD
Motions for Final Oral Argument (FOA—20 days after PD)	TBD
Comments on PD (20 days after PD filed)	TBD
Replies to motions for FOA (2 days after motions)	TBD
Reply Comments on PD (5 days after comments)	TBD
FOA	TBD
Commission decision on 2010 Plans and Supplements	TBD
IOUs issue RFOs for 2010 Solicitation, or otherwise pursue RPS procurement consistent with Plan and Supplement	TBD

[1] If motion made and granted, a revised schedule will be issued.

[2] Updates are not intended to the form and format of the Plan but may be appropriate for limited elements based on changed circumstances or recent information (e.g., new law, recent Commission decision, new regulation of the California Independent System Operator, harmonization of definitions within contract for specific terms).

TBD is to be determined.

(END OF ATTACHMENT C)

INFORMATION REGARDING SERVICE

I have provided notification of filing to the electronic mail addresses on the attached service list.

Upon confirmation of this document's acceptance for filing, I will cause a Notice of Availability of the filed document to be served upon the service list to this proceeding by U.S. mail. The service list I will use to serve the Notice of Availability of the filed document is current as of today's date.

Dated November 2, 2009, at San Francisco, California.

TERESITA C. GALLARDO

Teresita C. Gallardo