



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Continue
Implementation and Administration of California
Renewables Portfolio Standard Program.

Rulemaking 08-08-009
(August 21, 2008)

**PACIFICORP'S (U 901-E) ADDITIONAL SUPPLEMENT TO ITS
2008 INTEGRATED RESOURCE PLAN**

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Date: December 18, 2009

Attorney for PacifiCorp

**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
(August 21, 2008)

**PACIFICORP'S (U 901-E) ADDITIONAL SUPPLEMENT TO ITS
2008 INTEGRATED RESOURCE PLAN**

Pursuant to *Amended Scoping Memo and Ruling of Assigned Commissioner Regarding 2010 RPS Procurement Plans*, dated November 2, 2009 (the "Amended Scoping Memo"), PacifiCorp, d.b.a. Pacific Power, ("PacifiCorp" or "Company") (D 901-E) respectfully submits this additional supplement ("Additional Supplement") to its 2008 Integrated Resource Plan ("IRP") filed May 29, 2009 ("2008 IRP") and Supplement filed June 29, 2009 ("2010 IRP Supplement").

I. INTRODUCTION AND BACKGROUND

As noted in the Amended Scoping Memo, PacifiCorp is required to "file either (a) an IRP, with Supplement 30 days thereafter, or (b) a comprehensive Supplement at the same time the IODs file RPS procurement plans." Amended Scoping Memo at 4. Pursuant to that directive, the Company filed its 2010 Supplement on June 29, 2009, 30 days after filing its 2008 IRP.

In the spirit of streamlining and efficiency, the Amended Scoping Memo provides that PacifiCorp shall file and serve either "(a) an additional Supplement (2010

Supplement¹) to address issues raised [in the Amended Scoping Memo] 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 completely address its 2010 RPS Plan obligations and no additional 2010 Supplement is necessary." Amended Scoping Memo at 4-5. To that end, the Company provides the following information to address issues not contained within its 2008 IRP and 2010 IRP Supplement that is necessary to explain the Company's 2010 California Renewables Portfolio Standard ("RPS") program.

II. CALIFORNIA RPS COMPLIANCE AND PROGRAM METRICS

PacifiCorp filed a Semi-Annual RPS Compliance Report on August 3, 2009 ("August Report"), attached hereto as Exhibit A. In the August Report, PacifiCorp projects meeting its annual procurement targets ("APTs") and is on target to meet California's goal of 20 percent renewables in 2010 through a combination of owned and contracted resources and the use of flexible compliance mechanisms. The Accounting tab of the August Report indicates PacifiCorp's use of flexible compliance mechanisms, including the banking of excess procurement from owned and contracted resources and the application of the banked procurement in deficit years.

III. 2008 IRP ACKNOWLEDGMENT UPDATE

As noted above, PacifiCorp filed its 2008 IRP with its six state jurisdictions in May 2009. The 2008 IRP is subject to formal acknowledgment proceedings in four of the six states: Utah, Oregon, Washington, and Idaho. Washington and Idaho have acknowledged the 2008 IRP and acknowledgment orders are pending in Utah and Oregon. There are no changes with respect to renewable resource acquisition or the

¹ PacifiCorp filed its 2010 Supplement on June 29, 2009.

Company's plans to meet the California RPS compliance requirements as a result of the IRP acknowledgment orders issued by Washington and Idaho.

IV. RENEWABLES REQUEST FOR PROPOSALS UPDATE

As noted in PacifiCorp's 2010 IRP Supplement, the Company has issued multiple requests for proposals ("RFP") over the past several years for the purpose of requesting, receiving and evaluating renewable resource alternatives to fulfill a portion of the renewable resource need identified in the Company's 2008 IRP Action Plan. Action Item 1 of PacifiCorp's 2008 IRP Action Plan identifies up to 2,000 MW of cost-effective renewable resources to be acquired by 2013, including 1,400 MW of renewable resources outlined in PacifiCorp's Renewable Energy Action Plan. Under this plan, the Company seeks to acquire 1,400 MW of cost-effective renewable resources by 2010, with an additional 600 MW in place by 2013.

The 2010 IRP Supplement reported on the Company's issuance of a renewable RFP on October 6, 2008 ("2008R-1 RFP") for renewable resources up to 500 MW, limited in size to no more than 300 MW from any single resource. As a result of the 2008R-1 RFP, PacifiCorp executed a 200.2 MW power purchase agreement ("PPA") for the entire energy output from the Top of the World Wind Energy LLC project in Wyoming on August 26, 2009.

The 2010 IRP Supplement also reported that PacifiCorp filed an additional draft renewable RFP ("2009R RFP") with the Public Utility Commission of Oregon ("OPUC") on June 5, 2009, requesting renewable resources limited in size to no more than 300 MW from any single resource. The 2009R RFP was approved by the OPUC on July 7, 2009, and was issued to the market on July 8, 2009. After robust participation and a thorough

evaluation process, PacifiCorp has narrowed its selection to a final shortlist. The final shortlist was recently acknowledged by the OPUC at its public meeting on November 24, 2009. PacifiCorp is currently in negotiations with bidders on the shortlist and anticipates making a final bid selection and completing an acquisition by March 31, 2010.

Additionally, as a result of the RFP 2009R process, the Company has begun construction of the 111 MW Dunlap I wind project located in Wyoming.

In addition to its current strategy of issuing renewable RFPs to meet the aggressive renewable resource procurement targets set forth in Action Item 1 of the 2008 IRP, the Company has also pursued PPAs with Qualifying Facilities where the Company also receives the associated renewable energy credits to meet its renewable resource acquisition obligations. For example, on May 26, 2009, the Company executed a 17 MW PPA with Chevron for the full output of a wind facility near Casper, Wyoming.

V. ANNUAL SUPPLEMENT FILING PROCESS

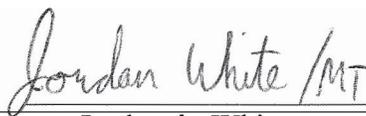
Pursuant to Decision 08-05-029, PacifiCorp requests a change to the current annual supplement filing schedule. As noted above, PacifiCorp is required to file its IRP with an accompanying supplement 30 days later. PacifiCorp filed its IRP and accompanying supplement on May 29 and June 29, 2009, respectively. Under the current process, in the years it does not file an IRP, PacifiCorp is also required to file a comprehensive IRP supplement at the same time California's three largest investor owned utilities file their annual RPS procurement plans. The lack of a fixed filing date for non-IRP year supplements creates a logistical challenge for PacifiCorp. A set filing schedule would allow the Company to more appropriately plan and execute its non-IRP year supplement.

PacifiCorp understands that Sierra Pacific Power Company is requesting to submit its supplement filing on July 15 of those years that it does not file an IRP. To maintain consistency in process among multi-jurisdictional utilities, PacifiCorp requests that the Commission also set the filing date for PacifiCorp's non-IRP year supplement as July 15.

VI. CONCLUSION

For the foregoing reasons, PacifiCorp respectfully submits this Additional Supplement. PacifiCorp is fully committed to meeting the 20 percent RPS requirement in 2010. Additionally, PacifiCorp respectfully requests that the Commission set the filing date for its non-IRP year supplements as July 15.

Respectfully submitted December 18, 2009, at San Francisco, California.

By 
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EXHIBIT A
August 2009 RPS Compliance Report

**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)

**AUGUST 2009 SEMI-ANNUAL COMPLIANCE REPORT OF
PACIFICORP (U 901-E) PURSUANT TO THE CALIFORNIA RENEWABLES
PORTFOLIO STANDARD**

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Date: August 3, 2009

Attorney for PacifiCorp

**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)

**AUGUST 2009 SEMI-ANNUAL COMPLIANCE REPORT OF
PACIFICORP (U 901-E) PURSUANT TO THE CALIFORNIA RENEWABLES
PORTFOLIO STANDARD**

Pursuant to Ordering Paragraph 6 of *Opinion on Reporting and Compliance Methodology for Renewables Portfolio Standard Program*, Decision (D.) 06-10-050, dated October 19, 2008, *Decision on Participation of Small and Multi-Jurisdictional Utilities in the Renewables Portfolio Standard Program*, Decision (D.) 08-05-029, dated May 29, 2008, and various modifications and updates to the standardized reporting format as provided by Energy Division staff, PacifiCorp (U 901-E) respectfully submits to Energy Division its renewables portfolio standard ("RPS") August 2009 Compliance Report ("Compliance Report"). This Compliance Report contains a Locked Spreadsheet, attached hereto as Attachment A.

PacifiCorp is providing these associated comments to clarify the important assumptions made in completing the Compliance Report given PacifiCorp's status as a multi-jurisdictional utility and recent updates made to reports submitted to the California Energy Commission ("CEC").

I. DISCUSSION

A. Preparation of Locked Spreadsheet

In preparation of the Locked Spreadsheet, PacifiCorp provides in its capacity as a multi-jurisdictional utility the following assertions to provide a full and complete submission to the Commission.

- First, as a multi-jurisdictional utility subject to oversight by six different state utility commissions (California, Idaho, Oregon, Utah, Washington, and Wyoming), most generating resources are treated by PacifiCorp as system resources (i.e., electricity output from a specific resource is not assigned to a particular state or customer). For purposes of establishing retail rates, PacifiCorp has utilized a Multi-State Process allocation methodology ("Revised Protocol") since June 1, 2004. The Revised Protocol is used to determine how the costs and revenues associated with PacifiCorp's generation, transmission and distribution system will be assigned or allocated among the six state jurisdictions for purposes of establishing retail rates. The Revised Protocol provides that the fixed costs of renewable system generating resources are allocated based on each state's relative contribution to system peak and energy requirements, also referred to as the SG factor. The variable costs are allocated based on each state's relative contribution to system energy requirements. The MSP Standing Committee Workgroup analyzed the factors that are applied to the renewable resource costs and based on their review, it was determined that the majority of the costs are allocated on each state's relative contribution to system peak and energy requirements using an SG factor. PacifiCorp then similarly applies the SG factor to allocate to each state jurisdiction its share of renewable resource output generated by the system resources. The net megawatt-hours reported

within the RPS Compliance Report's "Procurement Detail" spreadsheet are based upon total net megawatt-hours produced by a RPS-eligible resource during a calendar year and then multiplied by the SO factor applied to California. The SO factors used are as follows:

| | CA SO Factor |
|------|--------------------|
| 2001 | 1.7089% |
| 2002 | 1.8835% |
| 2003 | 1.8178% |
| 2004 | 1.9456% |
| 2005 | 1.8594% |
| 2006 | 1.8371 % |
| 2007 | 1.8408% |
| 2008 | 1.8020% |

- Second, in most cases, the information regarding forecasted output relies on a three-year average for each facility, multiplied by California's SO factor, unless plant retirement (actual or planned), asset sale, or contract expiration dates dictate otherwise. This forecasting methodology is used to provide the Commission with a reasonable assessment of forecasted output.
- Third, the Compliance Report includes publicly announced new PacifiCorp-owned wind projects. The output for these new wind projects assumes PacifiCorp's best assessment of output at the time of this filing. The forecasted output for these wind projects similarly is multiplied by California's SO factor.
- Fourth, existing Qualifying Facility ("QF") and renewable resource power purchase agreements are assumed to expire at contract termination. Additionally, PacifiCorp's Compliance Report reflects the output of QFs and the associated green tags, unless a QF contract expressly states that green tag ownership resides with the QF and not PacifiCorp.

- Fifth, the California-allocated output from all facilities and contracts do not include null power.
- Sixth, notwithstanding the foregoing, the outputs as computed or estimated in megawatt-hours are shown in the template provided by the Commission under the column heading "Contract Volume." PacifiCorp wishes to clarify that a purchase of the output of specific generators, especially wind generation, generally do not have specified volumes as part of the counterpart's contract obligation to deliver.
- Seventh, although the Commission's template makes no provisions for PacifiCorp-owned renewable generation assets, relevant information about these projects has been provided where applicable.
- Eighth, the California RPS procurement rules require that load serving entities must enter into long-term contracts or contracts with new facilities for energy deliveries equivalent to at least 0.25% of that load serving entity's prior year's retail sales, if it intends to use deliveries from short-term contracts and/or existing facilities for RPS compliance purposes. PacifiCorp meets this requirement based on Company-owned resources that were brought on line in 2008, and submitted documentation to the Energy Division to accompany its March 2009 RPS Compliance Report.

B. RPS Eligible Procurement

The data used in this Compliance Report has been prepared to comport with updated information the Company has provided to the CEC related to certification of its RPS-eligible procurement. As a result, PacifiCorp's baseline procurement amount and the amount of allocated procurement for the California RPS program have been adjusted in this Compliance Report compared to previous RPS compliance reports. Similarly, the Company has updated the

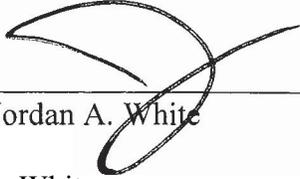
RPS-eligible procurement in all years to reflect the information provided to the CEC.

II. CONCLUSION

For the foregoing reasons, PacifiCorp respectfully submits its Compliance Report to Energy Division. PacifiCorp is fully committed to meeting the 20 percent RPS requirement in 2010. PacifiCorp continues to reserve the right to further respond to and contest any determination or payment of penalties pursuant to the California RPS program and this proceeding.

Respectfully submitted this August 3, 2009, at San Francisco, California.

By


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ATTACHMENT A

AUGUST 2009 SEMI-ANNUAL COMPLIANCE REPORT OF PACIFICORP (U 901-E)
PURSUANT TO THE CALIFORNIA RENEWABLES PORTFOLIO STANDARD

LOCKED SPREADSHEET

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue
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Rulemaking 08-08-009
(Filed August 21, 2008)

PacifiCorp

**August 2009 SEMI-ANNUAL COMPLIANCE REPORT
PURSUANT TO THE CALIFORNIA RENEWABLES
PORTFOLIO STANDARD**

3-Aug-09

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CALIFORNIA'S RENEWABLES PORTFOLIO STANDARD

Reporting and Compliance Worksheet Instructions

1. California's RPS Program requires Investor Owned Utilities (IOU), Multi-Jurisdictional Utilities (MJU), Electric Service Providers (ESP), and Community Choice Aggregators (CCAs) to file a minimum of two reports each year illustrating performance within the program. Parties may refer to the November 20, 2008 Assigned Commissioner Ruling Addressing Process Issues Relative to RPS Compliance Reports for more information.

- > The March 1 report (with updates after the California Energy Commission (CEC) verifies procurement, as needed) is used by the Commission to determine compliance for the prior year(s). This report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement data for at least three years (Decision (D.) 06-10-050, page 45,49).

- > The August 1 report states historic performance in the RPS program, current year targets and procurement data, and forecasts targets and procurement levels for each year forward through 2020 (0.06-10-050, page 45,51). The August report may be used by the Commission to make a final determination of compliance for the prior year(s).

2. Any load serving entity (ISE) seeking confidentiality protection should file a declaration. Confidentiality requests shall comply with the substantive and procedural rules set forth in 0.06-06-066, as modified by 0.08-04-023, the Commission's decision in its Confidentiality proceeding, Rulemaking (R.) 05-06-040, and any subsequent decisions issued in the same or successor proceeding. A declaration for confidentiality should include the identification of all redacted information by tab name and cell reference, not to be confused with the line numbers provided in the Accounting tab.

3. RPS compliance reports will be submitted to the Commission as specified below:

- > Serve a public version on the service list in proceeding R.08-08-009. All pages must be legible. ISEs are responsible for maintaining confidentiality when serving a redacted report.

- > File a confidential version with the Energy Division by e-mailing electronicversiontoab1@cpuc.ca.gov and svn@cpuc.ca.gov

- > Send paper copies (confidential and pUblc) to each of the assigned Administrative Law Judges (ALJs):

Burton W. Mattson and Anne E. Simon

California Public Utilities Commission

505 Van Ness Avenue

San Francisco, CA 94102

4. Any questions regarding the completion and/or filing of this report can be directed to:
Amy Baker, Energy Division, California Public Utilities Commission: ab1@cpuc.ca.gov, (415) 703-1691

5. Include the Title Page and fill out the following information:

- > Name of the ISE filing the Report

- > Date the Report is being filed

- > Contact information

6. Complete the Officer Verification Form in the format provided (Rule 1.11)

7. Yellow cells throughout the spreadsheet indicate user supplied data by the ISE where and when applicable.

- 8.

All data must be entered in MWh out to three decimal points to accurately account for retail sales, procurement and targets. The spreadsheet will display MWh throughout. Do not round any reporting data, as this may trigger some cells to turn red.

9. The spreadsheet included in this report has locked cells to ensure that targets, procurement and penalties are accurately calculated and reported from the data provided by the user. An unprotected version of the spreadsheet is also available by request.

10. Line #'s in the "Accounting" tab hyperlink to the "Calculations" tab, which provides additional information on the particular line item or section of the "Accounting" tab.

SUMMARY TAB

11. The "Summary" tab is linked to the "Accounting" tab and "Procurement Detail" tab, no data entry is required.

12. If the ISE determines that additional information is required in order to present a full and complete report, mark the box provided on the "Summary" tab. Any additional information should support the ISE's claim within the guidelines of the eight allowable reasons for noncompliance. Furthermore, please state anything else the filing ISE believes is necessary for a full and complete reporting to the Commission in order to allow an informed decision on compliance. This may include, for example, footnotes and other explanatory information as necessary and reasonable.

ACCOUNTING TAB

13. Begin by entering the relevant data for Lines 1-3, this will calculate the ISE's Baseline Procurement Amount. Enter actual and forecasted sales figures to generate Incremental Procurement Targets (IPTs) and Annual Procurement Targets (APTs).

14. In deficit years, the spreadsheet calculates what portion of the deficit is eligible for IPT deferral and earmarking. The user records how they elect to treat the deficit(s) in the relevant sections, including using surplus procurement. The spreadsheet calculates the allowable IPT deferral and Earmarking amount through 2020.

EARMARKING DETAIL TAB

15. Enter information for contracts that are eligible for earmarking and are being used for flexible compliance purposes. Data populates the earmarking section in the "Accounting" tab. LSEs should including power purchase agreements used for earmarking with their compliance filings, so Energy Division may verify eligibility. If the LSE has provided the power purchase agreement in a prior report or filing, it does not need to be provided again.

PROCUREMENT DETAIL

16. Procurement Summary: Total RPS Eligible Procurement is differentiated by three categories, *existing and or signed contracts, short-listed/under negotiation/pending approval, and generic future contracts*. This section is populated by completing the Contract Detail section below. If the LSE has entered into contracts that are short-term or with existing facilities but cannot meet its Annual Minimum Contracting Requirement, then deliveries from those contracts may not be used for compliance in any year (0.07-05-028).

> *Annual Contracting Quota Requirement*: LSEs must enter into long-term contracts or contracts with new facilities for energy deliveries equivalent to at least 0.25% of that LSE's prior years' retail sales, if it intends to use deliveries from short-term contracts and/or existing facilities, for RPS compliance purposes. LSEs must submit supporting documentation proving that the requirement has been met (i.e. a power purchase agreement for a long-term and/or new contract). If the LSE has provided the power purchase agreement in a prior report or filing, it does not need to be provided again.

- Contracts are differentiated by Contract term-length and type (row 15:16). All deliveries from "long-term and/or new" are automatically entered into "Cumulative Surplus Contracting Quota Bank" (row 19) and the user must input the MWh in row 18 that the LSE needs to comply with the Annual Contracting Quota Requirement, if necessary.

17. RPS Eligible Procurement by Resource Type: This report must state the amount procured or projected to be procured from each resource type (0.05-07-039, Appendix A, 0.06-10-050, page 47-48). This information is reported in rows 25-38 in the "Procurement Detail" tab and populated by completing the "Contract Detail" section.

18. Contract Detail: For each contract, enter actual and forecasted delivery data throughout the contract term. Do not assume that an expiring contract will be renegotiated.

> *Pre-2002 Contracts*: Input total annual deliveries by resource type

> *2002-Present years' Contracts*: List contracts by name, annual deliveries (MWh), project status, facility status and resource type.

> *2005-Present years' Contracts*: In addition to the requirements above, contracts from these years should be identified by term-length, short-term (less than 10 years) and long-term, as well as, by type, existing or new (defined below). 2005 and 2006 contracts that were signed prior to 2007 can be identified as "n/a" for this purpose.

- *"Contract Length / Type"* (Column "X") Pursuant to 0.07-05-028, starting in 2007, each RPS-obligated LSE must, in order to be able to count for any RPS compliance purpose energy deliveries from contracts of less than 10 years' duration ("short-term") with RPS-eligible facilities that commenced commercial operation prior to January 1, 2005 ("existing facilities"), in each calendar year enter into contracts with facilities of at least 10 years' duration ("long-term") and/or short-term contracts with facilities that commenced commercial operation on or after January 1, 2005 ("new facilities") for energy deliveries equivalent to at least 0.25% of that LSE's prior year's retail sales ("minimum quantity").

- *"Contract Volume"* (Column "Y") Input the total MWh over the term of the contract identified in the power purchase agreement. Compliance with the minimum quota requirement is measured by contracted-for-energy, not deliveries.

> *"Generic Future Contracts"*: Input total forecasted annual deliveries by resource type

> *"Expired Contracts"*: Any contract expiring prior to 2020 should be listed in this section. User should identify expired contract by name and input annual deliveries (MWh) in the first year the contract is no longer delivering for the LSE (per existing contract) and in every year thereafter. For example, if a contract with annual deliveries of 10,000 MWh expired 12/31/2007, user should enter 10,000 MWh in 2008 and in every year thereafter. If this same contract expired 6/30/2007, user should enter 5,000 MWh in 2007 and 10,000 in every year thereafter. If an expired or expiring contract is re-signed, remove contract information from "Expired Contracts" section and enter it under the appropriate contracting year, as you would for any other contract.

19. In the "Contract Status" column, "short-listed and/or under negotiation" is an option; use the short-listed option only for projects for which the LSE has a high level of confidence that a contract will be executed.
20. If any procurement data for a specific contract differs from what is entered into the CEC-RPS-Track form for that year, the specific cell should be highlighted and the discrepancy should be explained.

Spreadsheet user notes

> Protecting confidential data: Individual cells may be formatted black, which will serve to redact info when excel file is converted to pdf. Select cell - click on "fill color" icon - choose black. Note: Once converted to pdf, additional steps are necessary to ensure redacted data is not accessible.

> Adding and/or deleting rows. The "Earmarking Detail" tab and "Procurement Detail" tab allows users to add to or delete

RPS Compliance Report: Summary

| | |
|------------|------|
| PacifiCorp | 2007 |
| 3-Aug-09 | |

| RPS Summary Report | MWh | % |
|--------------------------------------|---------|------|
| Prior Year Total Retail Sales | 851,205 | |
| Annual Procurement Target (APT) | 62,947 | 7.4% |
| Total RPS Eligible Procurement | 55,102 | 6.5% |
| Annual Procurement Surplus/(Deficit) | (7,846) | |
| Adjusted Procurement Percentage* | | 7.4% |

* 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

| RPS Eligible Procurement | MWh | % |
|---------------------------------------|---------------|---------------|
| Biomass | 0 | 0.0% |
| Digester Gas | 0 | 0.0% |
| Biodiesel | 0 | 0.0% |
| Landfill Gas | 155 | 0.3% |
| Muni Solid Waste | 0 | 0.0% |
| <i>Biopower Subtotal</i> | 155 | 0.3% |
| Geothermal | 3,019 | 5.5% |
| Small Hydro | 37,255 | 67.6% |
| Conduit Hydro | 0 | 0.0% |
| Solar PV | 0 | 0.0% |
| Solar Thermal | 0 | 0.0% |
| Wind | 14,672 | 26.6% |
| Ocean/Tidal | 0 | 0.0% |
| Fuel cells | 0 | 0.0% |
| Total RPS Eligible Procurement | 55,102 | 100.0% |

| Flexible Compliance | MWh |
|----------------------------------|--------------|
| IPT Deferral | 0 |
| Earmarking | 0 |
| Banked Procurement Applied | 7,846 |
| Total Flexible Compliance | 7,846 |

| Deficits and Penalties | 2007 |
|---|------------|
| Preliminary Procurement (Deficit) | (7,846) |
| Adjusted Annual Procurement Deficit | 0 |
| Adjusted Deficit Deferred | 0 |
| Potential Penalty | \$0 |
| Current Penalty (with flexible compliance) | \$0 |

** Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

D Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (0.03-12-065, D.03-06-071, D.06-10-050 and Public Utilities Code Section 399.14(a)(2)(C)(ii).)

[Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferral promotes ratepayer interests and RPS objectives, Showing of good cause, Insufficient transmission]

If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

RPS Compliance Report: Summary

| | |
|-------------------|-------------|
| PacifiCorp | 2008 |
| 3-Aug-09 | |

| RPS Summary Report | MWh | % |
|--------------------------------------|------------|----------|
| Prior Year Total Retail Sales | 884,865 | |
| Annual Procurement Target (APT) | 71,796 | 8.1% |
| Total RPS Eligible Procurement | 73,492 | 8.3% |
| Annual Procurement Surplus/(Deficit) | 1,696 | |
| Adjusted Procurement Percentage" | | 8.3% |

" 'Adjusted Procurement Percentage' includes flexible compliance as proposed by the LSE, it is not necessarily used to determine compliance.

| RPS Eligible Procurement | MWh | % |
|---------------------------------------|---------------|---------------|
| Biomass | 0 | 0.0% |
| Digester Gas | 0 | 0.0% |
| Biodiesel | 0 | 0.0% |
| Landfill Gas | 140 | 0.2% |
| Muni Solid Waste | 0 | 0.0% |
| <i>Biopower Subtotal</i> | <i>141</i> | <i>0.2%</i> |
| Geothermal | 4,635 | 6.3% |
| Small Hydro | 42,013 | 57.2% |
| Conduit Hydro | 0 | 0.0% |
| Solar PV | 0 | 0.0% |
| Solar Thermal | 0 | 0.0% |
| Wind | 26,705 | 36.3% |
| Ocean/Tidal | 0 | 0.0% |
| Fuel Cells | 0 | 0.0% |
| Total RPS Eligible Procurement | 73,494 | 100.0% |

| Flexible Compliance | MWh |
|----------------------------------|------------|
| IPT Deferral | 0 |
| Earmarking | 0 |
| Banked Procurement ADDied | 0 |
| Total Flexible Compliance | 0 |

| Deficits and Penalties | 2007 |
|--|-------------|
| Preliminary Procurement (Deficit) | 0 |
| Adjusted Annual Procurement Deficit | 0 |
| Adjusted Deficit Deferred | 0 |
| Potential Penalty | \$0 |
| Current Penalty (with flexible compliance) | \$0 |

"" Potential Penalty is calculated based on 'Adjusted Annual Procurement Deficit' and may be deferred or waived if LSE provides allowable reasons and/or uses flexible compliance.

D Check box (x) if LSE is including supplemental materials necessary for a full and complete report (include attachments as needed).

Any supplemental materials should state each reason asserted in support of deferral or waiver of penalty, consistent with allowable reasons for non-compliance listed below. (0.03-12-065, 0.03-06-071, 0.06-10-050 and Public Utilities Code Section 399.14(a))

- Insufficient response to RFO, Contracts already executed will provide future deliveries sufficient to satisfy current year deficits, Inadequate public goods funds to cover above-market costs, Seller non-performance, Lack of effective competition, Deferr

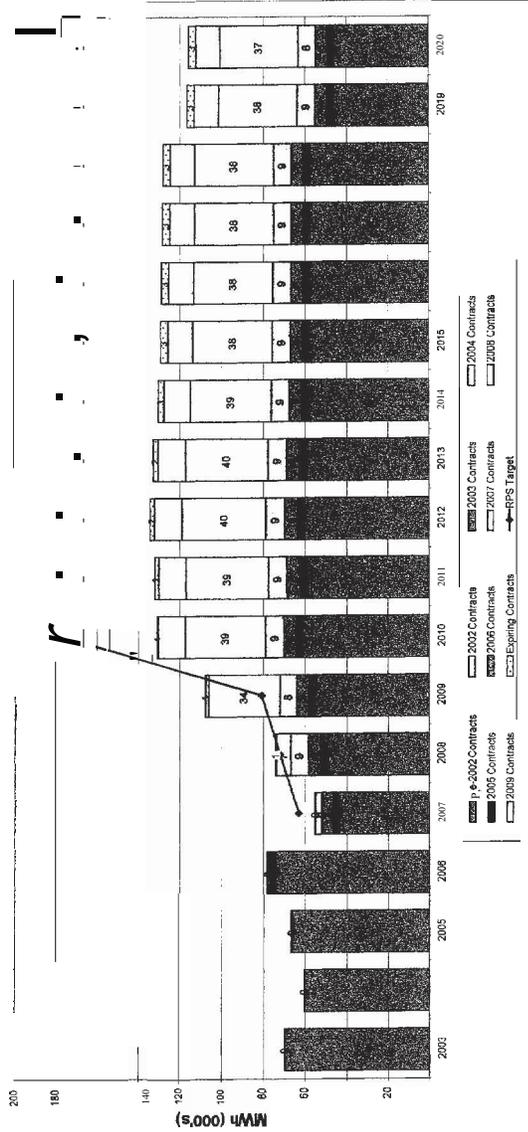
If stating earmarked contracts as a reason for a temporary deferral, make sure contract names and planned energy deliveries match what is listed in Earmarking Detail and Procurement Detail tabs.

RPS Compliance Report: Performance Chart

PacifiCorp
3-Aug-09

| RPS Measurement and Targets (MWh) | Actual MWh | | | | | | | | | | Forecast MWh | | | | | | | | | |
|-----------------------------------|------------|---------|---------|---------|---------|---------|---------|---------|---------|---------|--------------|---------|---------|---------|---------|---------|---------|---------|--|--|
| | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 | | |
| Local Retail Sales | 837,072 | 841,813 | 838,874 | 837,205 | 834,866 | 832,884 | 827,025 | 820,231 | 813,887 | 807,288 | 801,241 | 795,138 | 789,227 | 783,522 | 778,020 | 772,727 | 767,645 | 762,763 | | |
| Actual RPS Incurrence % | 8.6% | 8.7% | 8.6% | 8.5% | 8.4% | 8.3% | 8.2% | 8.1% | 8.0% | 7.9% | 7.8% | 7.7% | 7.6% | 7.5% | 7.4% | 7.3% | 7.2% | 7.1% | | |
| JPT to RPS (MWh) (2003) | N/A | 8,347 | 8,418 | 8,512 | 8,619 | 8,729 | 8,840 | 8,951 | 9,061 | 9,170 | 9,278 | 9,385 | 9,491 | 9,596 | 9,700 | 9,803 | 9,905 | 10,006 | | |
| APT to MWh Annual | N/A | N/A | N/A | N/A | N/A | N/A | 80,824 | 144,035 | 176,048 | 173,737 | 175,460 | 173,748 | 175,648 | 173,518 | 175,877 | 176,845 | 176,845 | 176,845 | | |
| Preliminary Subsumed (MWh) | 40,151 | 31,053 | 37,022 | 48,301 | 7,849 | 1,896 | 28,167 | 44,229 | 45,830 | 43,251 | 48,091 | 49,621 | 49,621 | 49,621 | 49,621 | 49,621 | 49,621 | 49,621 | | |

Actual and Expected RPS Generation vs. Targets



RPS Compliance Report Calculations

| Line# | Calculation | Notes |
|-------|----------------------|---|
| 1 | User supplied data | Consistent with D.07-03-046, the 2003 Inmal Baseline Procurement Amount for the Multi-Jurisdictional investor owned utilities (MJUs) is calculated using the following equation |
| 1a | User supplied data | $2003 \text{ CA sales (MWh)} / 2001 \text{ System sales MWh} = 2001 \text{ System's CA sales (\%)} / 2001 \text{ System's CA sales (\%)} = 2001 \text{ System RPS-eligible procurement (MWh)} / 2001 \text{ CA RPS-eligible procurement (MWh)}$ |
| 2 | User supplied data | $2001 \text{ System's CA sales (\%)} \cdot 2001 \text{ System RPS-eligible procurement (MWh)} = 2001 \text{ CA RPS-eligible procurement (MWh)}$ |
| 3 | User supplied data | $2001 \text{ CA RPS-eligible procurement (MWh)} / 2001 \text{ CA sales (MWh)} = 2001 \text{ CA RPS-eligible procurement (\%)} / 2001 \text{ CA sales (\%)} = 2001 \text{ CA RPS-eligible procurement (\%)} / 2001 \text{ CA sales (\%)} = \text{Initial Baseline Procurement Amount (MWh)}$ |
| 4 | Baseline Calculation | $(2001 \text{ CA RPS-eligible procurement (\%)} \cdot 2003 \text{ CA sales}) + (1\% \cdot 2001 \text{ CA sales}) = \text{Initial Baseline Procurement Amount (MWh)}$ |

| RPS Procurement and Targets (MWh) | | |
|-----------------------------------|---|--|
| Line# | Calculation | Notes |
| 5 | User supplied data | Annual Retail Sales |
| 6 | Data from "Procurement Detail" tab | In current and past years, this line should equal Total RPS Eligible Procurement in procurement detail tab. |
| 7 | Prior year Line 7 + Line 8 | 2007 APT = Baseline Amount + 2004 IPT + 2005 IPT + 2006 IPT + 2007 IPT (D.08-05-029, page 11) |
| 8 | 1% of line 5 (Y-1) | |
| 9 | Line 6 - Line 7 | |
| 10 | Line 7 / Line 5 (Y-1) | |
| 11 | Line 6 / Line 5 (Y-1) | In 2003, 2003 RPS procurement is divided by 2001 retail sales rather than 2002 retail sales. |
| 12 | (Line 6 + Line 17 + Line 25 + Line 30 + Line 34 + Line 36) / Line 5 (Y-1) | RPS procurement percentage after applying flexible compliance, assuming all allowable planned deliveries come online as planned. |

| Flexible Compliance - IPT Deferral | | |
|------------------------------------|--|--|
| Line# | Calculation | Notes |
| 13 | Up to 0.25% of Prior Year Retail Sales | In 2007, 100% of the IPT Deferral can be deferred for up to 3 years without explanation. |
| 14-16 | User supplied data | |
| 17 | Sum of Lines 14-16 | Current year deficit carried forward. Warning if cell value is greater than Line 13. |
| 18-20 | Record of Lines 14-16 | Deferred IPT obligations due in current year. |
| 21 | Sum of Lines 18-20 | Total deferred IPT obligations due in current year. |
| 22-24 | User supplied data | Past year IPT obligations retired with current year surplus procurement. Per accounting rules D. 06-10-050, Attachment A, page 9-10, current year deliveries may only be applied to past year IPT deficits after earmarked deliveries have been subtracted, and after any deliveries needed to meet current year APT have also been subtracted (D.03-06-0711, Conclusion of Law 25). |
| 25 | Sum of Lines 22-24 | Total current year surplus applied to prior year IPT obligations due in current year. |

| Flexible Compliance - Earmarking | | |
|----------------------------------|-----------------------------------|--|
| Line# | Calculation | Notes |
| 26 | Line 9 + Line 13 + Line 34 | Portion of current year deficit greater than allowable IPT Deferral |
| 27-29 | Data from "Earmarking Detail" tab | User supplied data |
| 30 | Sum of Lines 27-29 | |
| 31-33 | Data from "Earmarking Detail" tab | User-supplied data - Current year deliveries may only be applied to past year deficits which have been deferred by earmarking, after current year APT has been met (D.03-06-071), Conclusion of Law 25). |
| 34 | Sum of Lines 31-33 | Total current year surplus subtracted to meet prior years Earmarking obligations due in current year. |

| Surplus Procurement Bank | | |
|--------------------------|----------------------------|--|
| Line# | Calculation | Notes |
| 35 | Line 38 (Y-1) | |
| 36 | User supplied data | |
| 37 | Line 9 + Line 25 + Line 34 | Current year surplus procurement less any prior year IPT obligations and/or Earmarking obligations |
| 38 | Sum of Lines 35-37 | |

| Adjusted Deficit | | |
|------------------|---|--|
| Line# | Calculation | Notes |
| 39 | Line 9 + balance of IPT obligations after 3 years + balance of Earmarking obligations after 3 years | In any current year, the adjusted annual procurement deficit is the LSE's annual deficit less any deliveries used to meet IPT or Earmarking obligations for prior years deficits. Any portion of adjusted annual procurement deficit that remains after the following three years is subject to penalty. |
| 40 | Balance of IPT obligations after 3 years + balance of Earmarking obligations after 3 years | In any current year, the adjusted deficit temporarily excused is the sum of IPT deferral and Earmarked deliveries (line 17 + line 30). Any portion of line 40 remaining after 3 years will be reflected in line 39 and subject to penalty. |
| 41 | line 39 * \$50.0 | Per accounting rules, LSEs must list penalty based the size of an adjusted annual procurement deficit, even if allowable reasons are being given for why the penalty is not yet due and payable. Penalties are assessed at \$0.05/kWh deficit. |
| 42 | (Line 39 + 40) * \$50.0 | LSEs have the opportunity to make-up annual procurement deficits through existing flexible compliance rules. Accordingly, if an LSE has a deficit in year 1, and is able to fully exercise flexible compliance mechanisms, the penalty for year 1 compliance may not apply. |

OFFICER VERIFICATION FORM

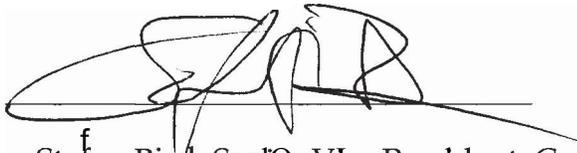
I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true. The spreadsheet format used to file this compliance report has not been altered from the version issued or approved by Energy Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 31, 2009 at Portland, Oregon.

31-Jul-09

Portland, Oregon



Stefan Bird, Senior Vice President, Commercial & Trading

Certificate of Service

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this 3rd day of August, 2009, provided via electronic mail or U.S. Mail (if an email address has not been provided), a true and correct copy of the August 2009 Semi-annual Compliance Report to the following parties:

Service List R.08-08-009

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| sha@cpuc.ca.gov | mwt@cpuc.ca.gov | mjh@cpuc.ca.gov | mjs@cpuc.ca.gov |
| rmm@cpuc.ca.gov | nlr@cpuc.ca.gov | nil@cpuc.ca.gov | mc3@cpuc.ca.gov |
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| claufenb@energy.state.ca.u | tbo@cpuc.ca.gov | Will.Brieger@doj.ca.gov | svn@cpuc.ca.gov |

OFFICER VERIFICATION

(Rule 1.11)

I am an officer of the reporting corporation herein, and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 18, 2009 at Portland, Oregon.

A handwritten signature in black ink, appearing to read 'Stefan Bird', is written over a horizontal line. The signature is stylized and somewhat cursive.

Stefan Bird

Senior Vice President, Commercial and Trading

Certificate of Service

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this 18th day of December, 2009, at Portland, OR, provided via electronic mail or U.S. Mail (if an email address has not been provided), a true and correct copy of PacifiCorp's (D 901-E) Additional Supplement to its 2008 Integrated Resource Plan to the following parties:

Service List R.08-08-009

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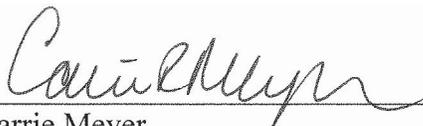
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