

BEFORE THE CALIFORNIA ENERGY COMMISSION

Draft 2006 RPS Verification Report

and

Implementation of Renewables
Portfolio Standard Legislation

Docket No. 02-REN-1038

Docket No. 03-RPS-1078
RPS Proceeding

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**COMMENTS OF PACIFICORP (U 901 E) ON DRAFT 2006 RPS VERIFICATION
REPORT**

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PacifiCorp, d.b.a. Pacific Power (“PacifiCorp” or “Company”) respectfully submits these comments on the California Energy Commission’s (“CEC”) Draft Renewables Portfolio Standard 2006 Procurement Verification Report (“Report”). PacifiCorp appreciates the CEC staff’s substantial efforts in preparing the Report. As the Commission is aware, PacifiCorp is a multi-jurisdictional utility (“MJU”) providing electric retail service to customers in California, Idaho, Oregon, Utah, Washington, and Wyoming. PacifiCorp serves approximately 46,500 customers in Del Norte, Modoc, Shasta, and Siskiyou counties in northern California. As such, PacifiCorp also expresses its appreciation for the detailed attention paid in the Report to the complex renewable portfolio standard (“RPS”) compliance issues faced by MJUs.

For example, as noted in the Report, CEC staff is working with PacifiCorp to obtain the correct Initial Baseline Procurement Amount (“IBPA”). The CEC, in coordination with the California Public Utility Commission (“CPUC”), looks to the Total System Retail Sales and 2001 System RPS-eligible procurement amounts to arrive at the IBPA. The task of determining

whether certain of PacifiCorp's procured renewable resources constitute an "eligible renewable energy resource," as that term is defined under California Public Utilities Code ("PUC") § 399.12(c); and therefore, whether these resources should be included to compute PacifiCorp's IBPA, is complicated due to the multi-jurisdictional nature of PacifiCorp's operations.

PacifiCorp will continue to work with CEC staff to provide the necessary information regarding the eligibility status of its procurement in a timely manner.

Respectfully, submitted this 16th day of February, 2010.



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