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April 29, 2011

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5504

Via Email:
Docket@energy.state.ca.us

Re: Docket No. 02-REN-1038 and Docket No. 03-RPS-1078,
Comments of PacifiCorp regarding the Staff Draft 2007 Renewables
Portfolio Standard Verification Report.

Dear Chairman Weisenmiller and Presiding Member Boyd:

PacifiCorp, d.b.a. Pacific Power (PacifiCorp or the Company), provides these comments on the Staff Draft 2007 Verification Report, released for comment on April 15, 2011. PacifiCorp expresses its appreciation to Staff for its cooperative efforts in the ongoing RPS verification process. Specifically, PacifiCorp appreciates Staff's acknowledgement of the corrected data for the Dillard Cogeneration Facility's 2006 RPS-eligible production.

PacifiCorp also appreciates Staff's willingness to address PacifiCorp's concerns about the potential of double claims related to generation from the Hill Air Force Base (Hill AFB) facility. Notwithstanding PacifiCorp's right to claim the procured generation in the interim tracking system and its possession of the WREGIS Certificates associated with that generation, the Company accepted Staff's request to temporarily remove this generation from the 2005 and 2006 RPS reports after PacifiCorp discovered, in 2011, that Hill AFB was claiming the RPS generation value from this facility for the Federal Energy Policy Act of 2005 (EPACT) program. The Company remains optimistic that it will eventually work out this issue with Hill AFB, but currently it is not clear when this will happen. PacifiCorp will inform Staff when a resolution occurs.

In the meantime, to provide a complete description of this particular issue, PacifiCorp requests one correction to the language found at the bottom of page 23. Specifically, the Company asks that the following language be added as a second sentence in the paragraph beginning "If the renewable benefit ...": "However, under the EPACT rules, the RECs may not be eligible for reporting by Hill AFB to the EPACT program." Accordingly, the full paragraph would read:

If the renewable benefits from the electricity generated by Hill AFB have been reported to the EPACT program, the procurement is not eligible for California's RPS program. However, under the EPACT rules, the RECs may not be eligible for reporting by Hill AFB to the EPACT program. PacifiCorp is working on documenting that the Hill AFB procurement claim should not have been reported to EPACT and that it would not represent double-counting if counted for California's RPS. If Energy Commission staff is able to verify PacifiCorp's claim as RPS eligible, PacifiCorp will revise its RPS-Track form to include procurement from Hill AFB. Until then, the Hill AFB procurement is ineligible for the RPS and PacifiCorp has removed the claim from previous RPS-Track forms for compliance years 2005-2006.

PacifiCorp thanks Staff for its attention to this matter. Should there be any questions concerning these comments, please do not hesitate to contact me.

Respectfully submitted,



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