



201 South Main, Suite 2300  
Salt Lake City, Utah 84111

July 10, 2008

***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111

Attention: Julie P. Orchard  
Commission Secretary

RE: Docket No. 08-035-T02. Advice Filing 08-02  
Schedule 70 – Renewable Energy Rider – Optional  
Schedule 72 – Renewable Energy Rider – Optional  
Bulk Purchase Option

Enclosed for filing are an original and two copies of proposed tariff changes associated with Tariff P.S.C.U. No. 47 of Rocky Mountain Power applicable to electric service in the State of Utah. The enclosed tariff changes replace the proposed tariff changes filed with the Commission on March 27, 2008. Pursuant to the requirements of Rule R746-405-2D, PacifiCorp (the “Company”) states that the proposed tariff sheets do not constitute a violation of state law or commission rule. The Company will also provide an electronic version of this filing to [tbehr@utah.gov](mailto:tbehr@utah.gov). The Company is requesting an effective date of August 9, 2008.

First Revision of Sheet No. 70.4	Schedule 70	Renewable Energy Rider – Optional
First Revision of Sheet No. 72.4	Schedule 72	Renewable Energy Rider – Option Bulk Purchase Option

On March 27, 2008, Rocky Mountain Power filed proposed revisions to Special Condition 5 of the Blue Sky Program Schedules 70 and 72. Those changes addressed the requirement that all renewable energy credits purchased for the Blue Sky Program be registered with the Western Renewable Energy Generation Information System (WREGIS). Because of the limited availability and the price of WREGIS registered RECs, the Company proposed only purchase WREGIS registered RECs when available and at a cost competitive with RECs not registered through WREGIS.

On April 21, 2008, the Division of Public Utilities recommended that the Commission suspend the proposed Tariff because there were unanswered questions that should be resolved regarding the Company’s proposed modifications. While acknowledging the program’s need for sufficient RECs at a reasonable price, the Division stated that it was:

“also concerned that the REC purchasing process must be transparent and must clearly show that such purchases are legitimate, are in the public interest, and effectively facilitate the fulfillment of program goals. The Division recommends that before any such change is made to these schedules, the Company clarify the proposed language change to show how RECs purchased outside of the WREGIS will be certified as valid, and to also explain how price information will be tracked.”

The Company understands and agrees with the Division’s concern for verification and transparency. To address this concern Rocky Mountain Power’s Blue Sky program became Green-e Energy Certified in February 2008. Green-e Energy certifies that the renewable energy Rocky Mountain Power purchases meet the rigorous environmental and consumer-protection standards established by the nonprofit Center for Resource Solutions (CRS). Green-e Energy was established by CRS to ensure transparency and create an objective standard consumers can use to compare renewable energy options, as well as verify that consumers get what they pay for.

The Company is very supportive of WREGIS and currently purchases WREGIS registered RECs for the Blue Sky Program when they are available at a reasonable price. However, because of the limited availability and the price of WREGIS registered RECs, Rocky Mountain Power recommends that the Commission approve a waiver of the requirement for WREGIS-registered RECs for calendar year 2008. The Company further recommends that the Company and the Commission re-evaluate the supply and price of WREGIS-registered RECs for applicability of the requirement in calendar year 2009.

In order to meet its current obligations to program participants and to protect them from unintended consequences due to the shortage of WREGIS-registered RECs, the Company proposes to modify the language on Special Condition 5 in Schedules 70 and 72 to read as follows:

5. Beginning February 1, 2008, all RECs purchased under the program must conform with Green-e Energy national standards and be Green-e certified or Green-e certifiable. Beginning in January 1, 2009, all RECs purchased are expected to be registered with the Western Renewable Energy Generation Information System (WREGIS) or as otherwise approved by the Public Service Commission of Utah given market availability.

In addition, the Company is proposing a revision to Special Condition 2 of Schedules 70 and 72, changing “will” to “may” to allow flexibility in enrollment of Blue Sky participants. The proposed paragraph will read as follows:

2. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.

The purpose of this change is to accommodate those customers that have a desire to participate in the Blue Sky Program and do not have challenges in payment of their utility bills, but from time

Utah Public Service Commission

July 10, 2008

Page 3

to time may pay their bill late, or forget to pay their utility bill. Recently, this issue has been brought to our attention by our customers, and we anticipate with the continuing increase in Blue Sky enrollments, absent this change in our tariffs, we will continue to receive customer feedback regarding individual ineligibility to participate in this valuable program.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

By fax: (503) 813-6060

Informal inquiries may be directed to Dave Taylor at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation  
Enclosures