November 2, 2010

Exhibit A

PacifiCorp's Emissions Reductions Plan

In connection with its Best Available Retrofit Technology ("BART") determinations and its other regional haze planning activities, the Wyoming Department of Environmental Quality, Air Quality Division ("AQD") asked PacifiCorp to provide additional information about its overall emission reduction plans through 2023. The purpose is to more fully address the costs of compliance on both a unit and system-wide basis. PacifiCorp is committed to reduce emissions in a reasonable, systematic, economically sustainable and environmentally sound manner while meeting applicable legal requirements. These legal requirements include complying with the regional haze rules which encompass a national goal to achieve natural visibility conditions in Class 1 areas by 2064

Summary

PacifiCorp owns and operates 19 coal-fueled generating units in Utah and Wyoming, and owns 100% of Cholla Unit 4, which is a coal-fueled generating unit located in Arizona. PacifiCorp is in the process of implementing an emission reduction program that has reduced, and will continue to significantly reduce emissions at its existing coal-fueled generation units over the next several years. From 2005 through 2010 PacifiCorp has spent more than $1.2 billion in capital dollars. It is anticipated that the total costs for all projects that have been committed to will exceed $2.7 billion by the end of 2022. The total costs (which include capital, O&M and other costs) that will have been incurred by customers to pay for these pollution control projects during the period 2005 through 2023, are expected to exceed $4.2 billion, and by 2023 the annual costs to customers for these projects will have reached $360 million per year.

Environmental benefits, including visibility improvements will flow from these planned emission reductions. PacifiCorp believes that the emission reduction projects and their timing appropriately balance the need for emission reductions over time with the cost and other concerns of our customers, our state utility regulatory commissions, and other stakeholders. PacifiCorp believes this plan is complementary to and consistent with the state's BART and regional haze planning requirements, and that it is a reasonable approach to achieving emission reductions in Wyoming and other states.

PacifiCorp's Long-Term Emission Reduction Commitment

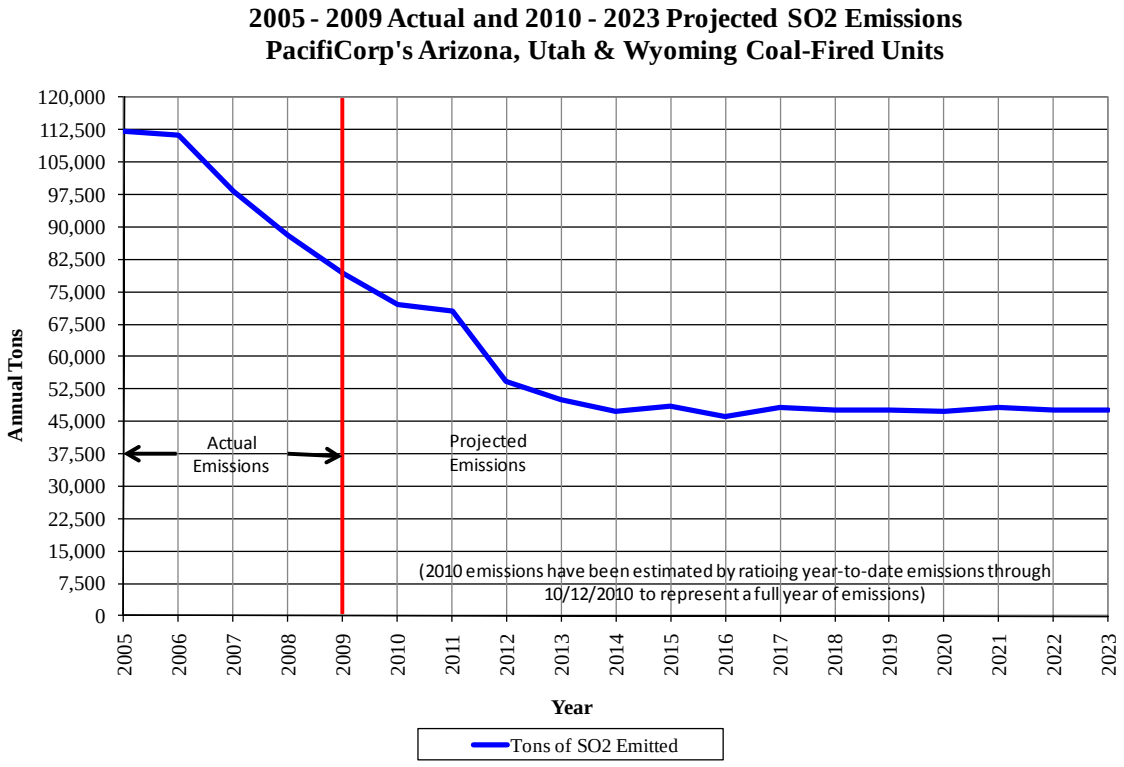
Table 1 below identifies the emission reduction projects and related construction schedules as currently included in PacifiCorp's reduction plan.

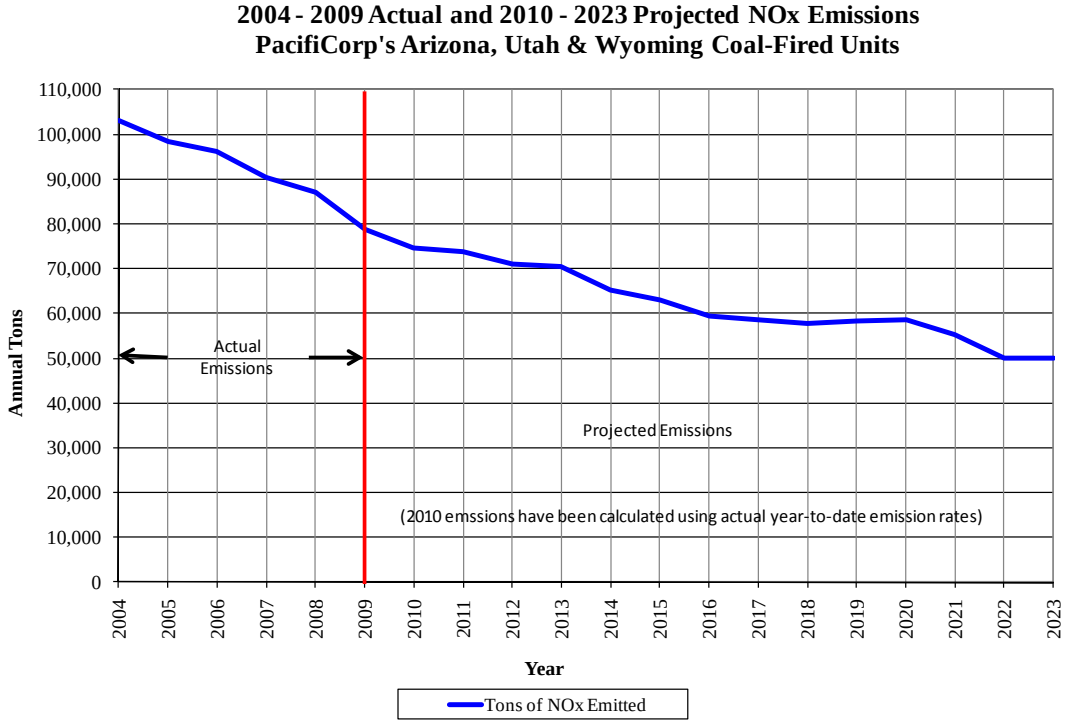
Table 1: Long-Term Reduction Plan

Plant Name	SO2 Scrubbers Installation - I Upgrades - U	Low NOx Burner Installations	Baghouse Installations	Status of SO2 / LNB / Baghouse Permitting	Selective Catalytic Reduction
Hunter 1	2014 - U	2014	2014	Permitted	
Hunter 2	2011 - U	2011	2011	Under Construction	
Hunter 3	Existing	2008	Existing	Completed	
Huntington 1	2010 - U	2010	2010	Under Construction	
Huntington 2	2007 - I	2007	2007	Completed	
Dave Johnston 3	2010 - I	2010	2010	Completed	
Dave Johnston 4	2012 - I	2009	2012	Under Construction	
Jim Bridger 1	2010 - U	2010		Completed	2022
Jim Bridger 2	2009 - U	2005		Completed	2021
Jim Bridger 3	2011 - U	2007		Permitted	2015
Jim Bridger 4	2008 - U	2008		Completed	2016
Naughton 1	2012 - I	2012		Under Construction	
Naughton 2	2011 - I	2011		Under Construction	
Naughton 3	2014 - U	2014	2014	Baghouse Permitted	2014
Wyodak	2011 - U	2011	2011	Under Construction	
Cholla 4	2008 - U	2008	2008	Completed	

The following charts represent the reductions in emissions that will occur at units owned by PacifiCorp in Utah, Wyoming and Arizona[1]. It is significant to note that permitting has been completed for all but the SCR projects; permitting for the SCR projects will be completed as needed in advance of project construction. The emission estimates shown in these charts have been calculated using projected unit generation and heat rate data in conjunction with each unit's permitted emission rate. In those cases were the units do not have emissions controls the estimates have been based on projections of the future coal quality. All projections used are from PacifiCorp's ten-year business plan. Actual future emissions will be less than those estimated in these charts since the units will operate below their permitted rates.

[1] PacifiCorp is also a joint owner of coal-fueled facilities in Colorado and Montana that are subject to regional haze planning requirements and for which PacifiCorp will incur associated costs of emissions controls.


2005 - 2009 Actual and 2010 - 2023 Projected SO2 Emissions
PacifiCorp's Arizona, Utah & Wyoming Coal-Fired Units
Annual Tons
120,000
112,500
105,000
97,500
90,000
82,500
75,000
67,500
60,000
52,500
45,000
37,500
30,000
22,500
15,000
7,500
0
Actual Emissions
Projected Emissions
(2010 emissions have been estimated by ratioing year-to-date emissions through 10/12/2010 to represent a full year of emissions)
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
Year
Tons of SO2 Emitted


2004 - 2009 Actual and 2010 - 2023 Projected NOx Emissions
PacifiCorp's Arizona, Utah & Wyoming Coal-Fired Units
Annual Tons
110,000
100,000
90,000
80,000
70,000
60,000
50,000
40,000
30,000
20,000
10,000
0
Actual Emissions
Projected Emissions
(2010 emssions have been calculated using actual year-to-date emission rates)
2004
2005
2006
2007
2008
2009
2010
2011
2012
2013
2014
2015
2016
2017
2018
2019
2020
2021
2022
2023
Year
Tons of NOx Emitted

Project Installation Schedule

Emission reduction projects of the number and size described above take many years to engineer, plan and build. When considering a fleet the size of PacifiCorp's, there is a practical limitation on available construction resources and labor. There is also a limit on the number of units that may be taken out of service at any given time as well as the level of construction activities that can be supported by the local infrastructures at and around these facilities. Such limitations directly impact both the overall timing of these projects as well as their timing in relation to each other. Additional cost and construction timing limitations include the loss of large generating resources during some parts of construction and the associated impact on the reliability of PacifiCorp's electrical system during these extended outages. In other words, it is not practical, and it is unduly expensive, to expect to build these emission reduction projects all at once or even in a compressed time period. The pressure on emission reduction equipment and skilled labor is likely to be exacerbated by the significant emission reduction requirements necessitated by the Environmental Protection Agency's Clean Air Transport Rule which requires emission reductions in 31 Eastern states and the District of Columbia beginning in 2012 and 2014. The Environmental Protection Agency has indicated that a second Transport Rule is likely to be issued in 2011, requiring additional reductions in the Eastern U.S. beyond those effective in 2014. The balancing of these concerns is reflected in the timing of PacifiCorp's emission reduction commitments.

Priority of Emission Reductions

PacifiCorp's initial focus has been on installing controls to reduce SO_2 emissions which are the most significant contributors to regional haze in the western US. In addition, PacifiCorp continues to rely on the rapid installation of low NO_x burners to significantly reduce NOx emissions. Also, the installation of five SCRs (or similar NOx-reducing technologies) will be completed by 2023 and reduce NOx emissions even further. PacifiCorp's commitment also includes the installation of several baghouses to control particulate matter emissions. For those units which utilize dry scrubbers, baghouses have the added benefit of improving SO2 removal. Baghouses also significantly reduce mercury emissions.

In addition to reducing emissions at existing facilities, PacifiCorp has avoided increasing emissions by adding more than 1,400 megawatts of renewable generation between 2006 and 2010. In order to meet growing demand for electricity, PacifiCorp added non-emitting wind generation to its portfolio at a cost of over $2 billion and has dismissed further consideration of a new coal-fueled unit.

Emission Reductions and BART Deadlines

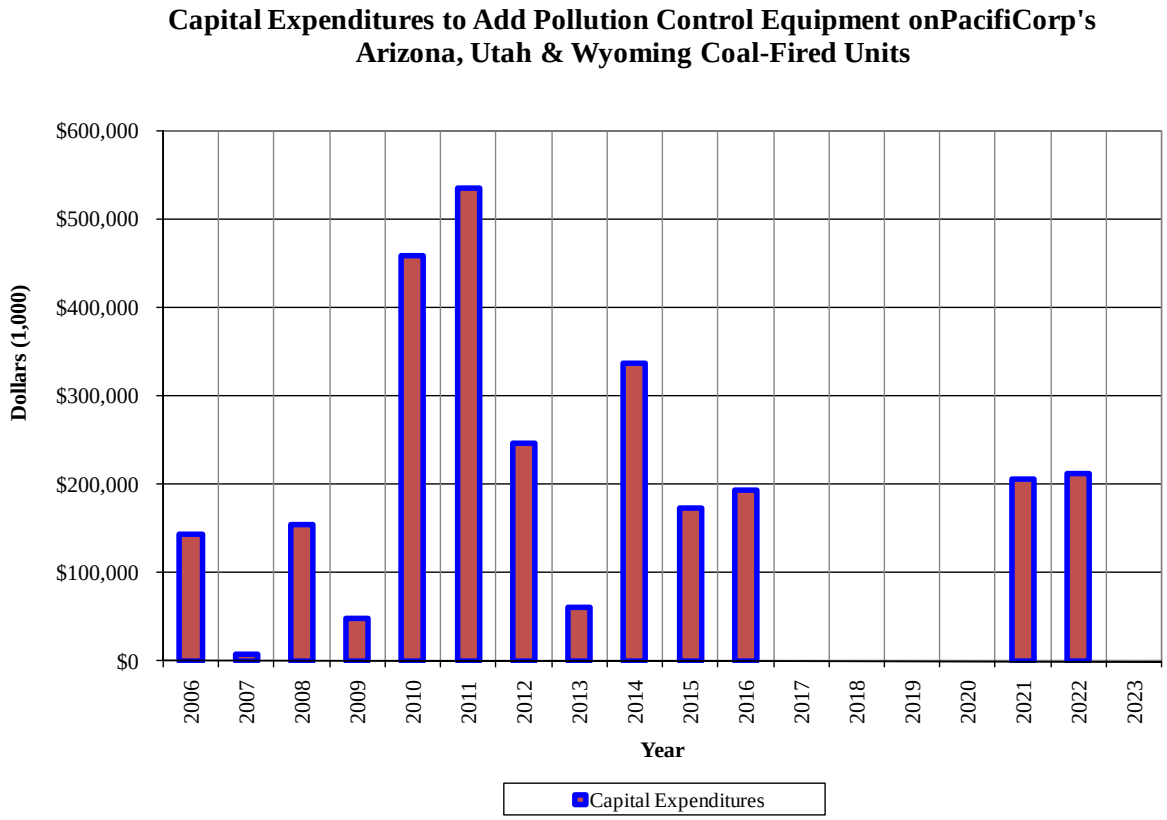
As depicted in the table and charts above, PacifiCorp began implementing its emission reduction commitments in 2005. This was well ahead of the emission reduction timelines under the regional haze rules which require BART to be installed no later than five years following approval of the applicable Regional Haze SIP. This also provides a graphic demonstration of the construction schedule and other limitations described above, as PacifiCorp was required to begin installing emission control projects at some units earlier in order to complete projects at other

units within the five years after SIP approval. The table above demonstrates that most of the projects to be built between 2010 and 2014, likewise, will be installed in advance of the required completion date under BART requirements.

Customer Impacts

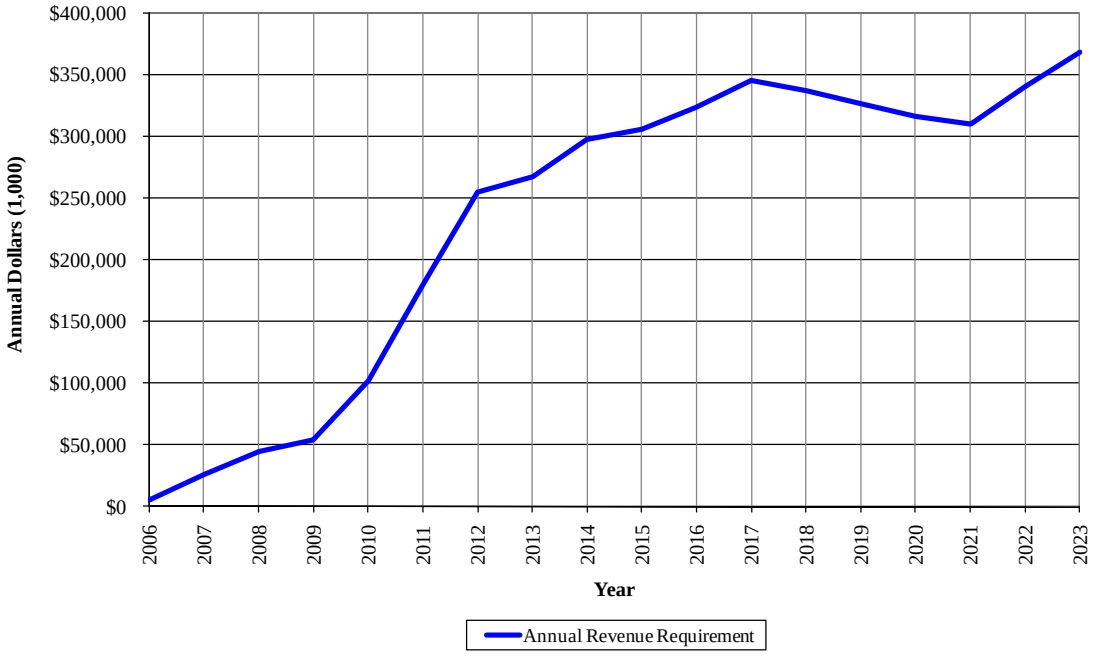
The following charts identify the timing and magnitude of the capital and O&M expenses that will be incurred due to the projects identified in Table 1. The charts identify:

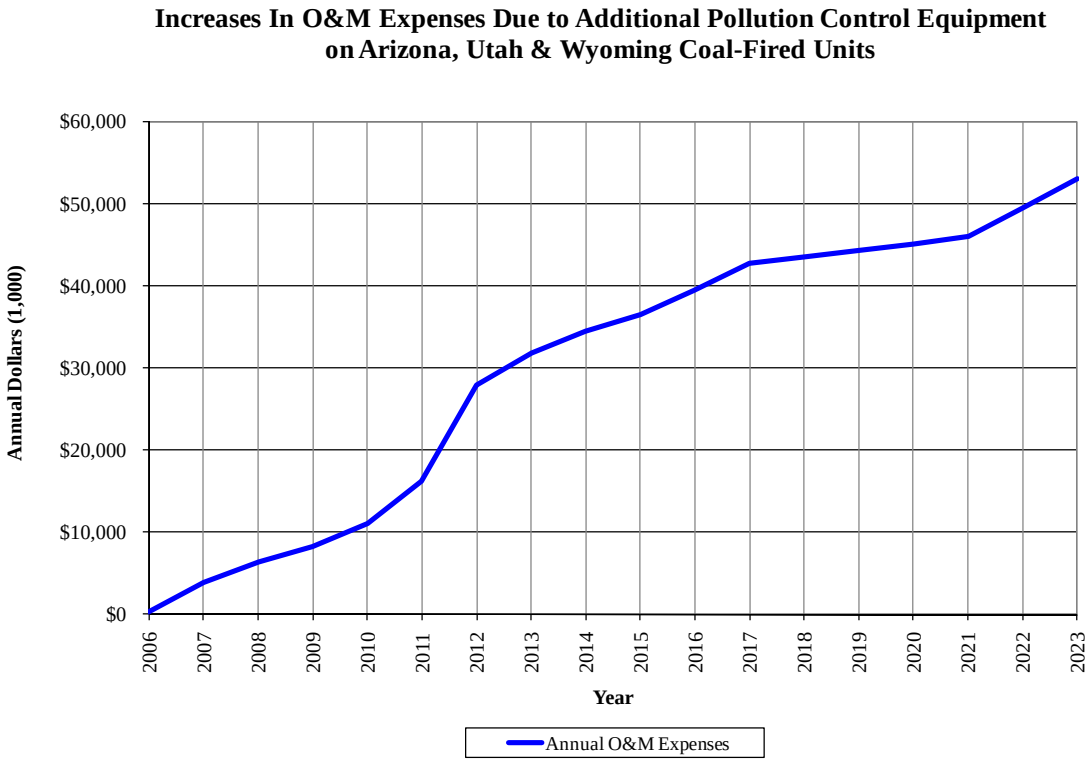
1. The timing and magnitude of the capital costs.
2. The O&M expenses that will be incurred due to these projects.
3. The expected annual costs[2] through 2023 that customers will be incur as a result of these specific pollution control projects.



[2] PacifiCorp has made every attempt to provide an accurate estimate of the anticipated increase in annual revenue requirements that will ultimately be translated to increases in customers' electricity rates. However, there are several variables such as interest rates, inflation rates, discount rates, depreciation lives, and final construction costs and operating and maintenance expenses that will be considered at the time these projects actually go into rate base and will influence the actual revenue requirements associated with these capital projects.

Annual Increase to Customers Due to Additional Pollution Control Equipment on Arizona, Utah & Wyoming Coal-Fired Units





As can be seen from the previous charts, the rate increases for PacifiCorp customers associated with PacifiCorp's emission reduction strategy alone will be significant. In the event that PacifiCorp is required to accelerate or add to the planned emission reduction projects, the cost impacts to our customers can be expected to increase incrementally, particularly as plant outage schedules are extended and the need for skilled labor and material increases in the near term.

Of particular note, the projected costs reflect only the installation of the noted emission reduction equipment. These cost increases do not include other costs expected to be incurred in the future to meet further emission reduction measures or address other environmental initiatives, including but not limited to (see Attachment 1):

1. Impleme ntation of Utah's Long Term Strategy for meeting regional haze requirements during the 2018-2023 time period.

2. The addition of mercury control equipment under the requirements of the upcoming mercury MACT provisions. PacifiCorp estimates that $68 million in capital will be incurred by 2015 and annual operating expenses will increase by $21million per year to comply with mercury reduction requirements. In addition, anticipated regulation to address non-mercury hazardous air pollutant (HAPs) emissions may require significant additional reductions of SO_2, as a precursor to sulfuric acid mist, from non-BART units that currently do not have specific controls to reduce SO_2 emissions.

3. Mitigating and controlling CO_2 emissions. While Congress has not yet passed comprehensive climate change legislation, in December 2009, the Administrator of the Environmental Protection Agency made a finding that greenhouse gases in the atmosphere threaten the public health and welfare of current and future generations. Having made the so-called "endangerment finding," EPA issued the final greenhouse gas tailoring rule, effective January 2, 2011, which will require greenhouse gas emissions to be addressed under PSD and Title V permits[3]. Likewise, mandatory reporting of greenhouse gas emissions to the Environmental Protection Agency commenced beginning in January 2010.

4. In addition, there are a number of regional regulatory initiatives, including the Western Climate Initiative that may ultimately impact PacifiCorp's coal-fueled facilities. PacifiCorp's generating units are utilized to serve customers in six states – Wyoming, Idaho, Utah, Washington, Oregon and California. California, Washington and Oregon are participants in the Western Climate Initiative, a comprehensive regional effort to reduce greenhouse gas emissions by 15% below 2005 levels by 2020 through a cap-and-trade program that includes the electricity sector; each state has implemented state-level emissions reduction goals. California, Washington and Oregon have also adopted greenhouse gas emissions performance standards for base load electrical generating resources under which emissions must not exceed 1,100 pounds of CO_2 per megawatt hour. The emissions performance standards generally prohibit electric utilities from entering into long-term financial commitments (e.g., new ownership investments, upgrades, or new or renewed contracts with a term of 5 or more years) unless the base load generation supplied under long-term financial commitments comply with the greenhouse gas emissions performance standards. While these requirements have not been implemented in Wyoming, due to the treatment of PacifiCorp's generation on a system-wide basis (i.e., electricity generated in Wyoming may be deemed to be consumed in California based on a multi-state protocol), PacifiCorp's facilities may be subject to out-of-state requirements.

5. Regulations associated with coal combustion byproducts. In June 2010, the Environmental Protection Agency published a proposal to regulate the disposal of coal combustion byproducts under the Resource Conservation and Recovery Act's Subtitle C or D. Under either regulatory scenario, regulated entities, including PacifiCorp, would be required, at a minimum; to retrofit/upgrade or discontinue utilization of existing surface impoundments within five years after the Environmental Protection Agency issues a final rule and state adoption of the appropriate controlling regulations. It is anticipated that the requirements under the final rule will impose significant costs on PacifiCorp's coal-fueled facilities within the next eight to ten years.

[3] The Environmental Protection Agency has not yet published its proposed guidance on what constitutes Best Available Control Technology for greenhouses gases.

6. The installation of significant amounts of new generation, including gas-fueled generation and renewable resources.

7. The addition of major transmission lines to support the renewable resources and other added generation.

8. Increasing escalation rates on fuel costs and other commodities

BART and Regional Haze Compliance

PacifiCorp firmly believes that the commitments described above meet the letter and intent of the regional haze rules, including the guidance provided by the EPA known as "Appendix Y." The regional haze program is a long-term effort with long-term goals ending in 2064. It must be approached from that perspective. It was never intended to require SCR on BART-eligible units within the first five years of the program. Rather, it calls for a transition to lower emissions exactly as PacifiCorp has implemented to date and as it has proposed going forward through 2023.

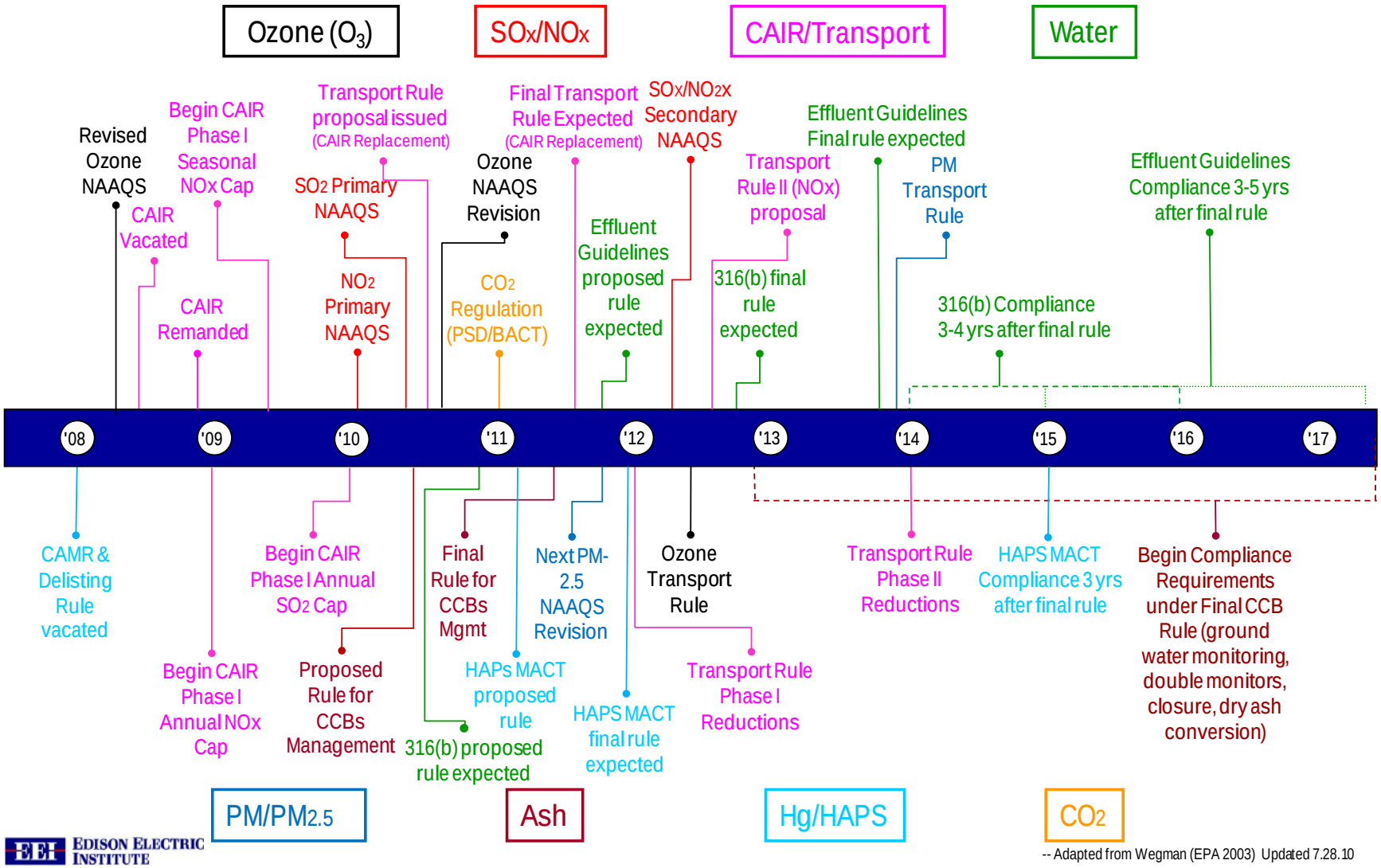
In its evaluation of emission reductions for regional haze purposes, the state should also consider several other variables which will significantly affect emissions and costs over the next ten years. These include such things as the development of new emission control technology, anticipated new emission reduction legislation and rules, the new ozone standard, the one hour SO_2 and NO_2 standards, the $PM_{2.5}$ standard, potential CO_2 regulation and costs, an aging fleet, and changing economic conditions. All of these variables matter and will affect the long-term viability of each PacifiCorp coal unit and will contribute to the reduction of regional haze in the course of the implementation of these programs. This, in turn, will affect the controls, costs and future operational expectations associated with these generating resources.

Conclusion

PacifiCorp has made a significant, long-term commitment to reducing emissions from its coal-fueled facilities and requests that the AQD consider this commitment as a reasonable approach to achieving emission reductions in Wyoming.

November 2, 2010

Attachment 1 Possible Timeline for Environmental Regulatory Requirements for the Utility Industry



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-- Adapted from Wegman (EPA 2003) Updated 7.28.10