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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2011 Integrated Resource Plan

Docket No. 11-2035-01

Errata to Comments of Utah Clean Energy

In its Comments on PacifiCorp's 2011 IRP, filed on September 7, 2011, Utah Clean Energy inadvertently omitted a word on page 16 (in the section on "Wind modeling constraints"). The paragraph is quoted below with the missing word included in italics.

"Another issue of particular concern with regard to this IRP is that PacifiCorp's modeling of renewable resource costs did not model a revenue credit for unbundled REC sales. By way of explaining this decision, the Company states, "Once greenhouse gases are regulated—and until the unbundled REC and carbon markets are reconciled—PacifiCorp plans to cease selling unbundled RECs. As an assumption for portfolio modeling, renewable resource costs do not reflect a revenue credit for unbundled REC sales." However, at this time, greenhouse gases are not *fully* regulated and PacifiCorp continues to sell unbundled RECs; therefore, the Company has imposed an unjustified burden on renewable energy by not crediting its costs with the value the

¹ 2011 IRP, page 42.

Company is receiving from its renewable attributes. This decision violates the direction to compare resources on a consistent and comparable basis² and should not be acknowledged."

Dated this 4th day of October, 2011.

Utah Clean Energy

/s/_____Sophie Hayes

Attorney for Utah Clean Energy

² Standards and Guidelines, 4b, page 44.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by email this 4^{th} day of October, 2011, to the following:

Pete Warnken PacifiCorp pete.warnken@pacificorp.com	Gary Dodge Hatch, James & Dodge Attorneys for Utah Association of Energy Users gdodge@hjdlaw.com	Lisa Hickey Attorney for Interwest Energy Alliance <u>lisahickey@coloradolawyers.net</u>
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