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To: Utah State Public Service Commission and Committee of Consumer Services

From: Lowell Alt, Director, Division of Public Utilities
Judith Johnson, Manager, Energy Section
Bob Maloney, Management Analyst

Subject: Recommendation to Approve PacifiCorp's Claimed Major Event Exclusions for November 22 through November 27, 2001.

Date: Tuesday, February 26, 2002

We recommend that the Commission approve PacifiCorp's claimed major event exclusion for November 22 through November 27, 2001.

PacifiCorp has submitted data showing that significantly more than 10% of the customers in nine affected Utah operations areas experienced a sustained outage of more than five minutes duration during the major event.

ScottishPower/PacifiCorp merger condition #31 indicates that the Company may use the IEEE criteria to determine major events. IEEE criteria include:

1. Exceeds the design limits of the power system
2. Causes extensive damage to the power system
3. Results in more than 10% of the customers in an operations area experiencing a sustained outage.

We recommend approval based upon criterion #3. We do so because significantly more than 10% of PacifiCorp's Utah customers in nine affected operations areas experienced sustained outages.