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September 21, 2006

Julie P. Orchard
Commission Secretary
Public Service Commission of Utah
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, Utah 84111

Re: Docket No. 05-035-54 – Notice of Compliance Filing: General Commitment No. 51—
Disclosure Statement re Intermountain Geothermal

Dear Ms. Orchard:

Rocky Mountain Power, a division of PacifiCorp, hereby submits to the Commission an original and five copies of the enclosed Disclosure Statement, which was filed with the Wyoming Public Service Commission, that details any potential liabilities and risks, identified by or for MidAmerican Energy Holdings Company (“MEHC”), associated with the ownership rights of MEHC in Intermountain Geothermal.

In its Report and Order issued January 27, 2006, as supplemented by the Report and Order dated March 14, 2006, in the above-referenced proceeding, the Commission approved the acquisition of PacifiCorp by MEHC subject to a Consolidated List of Commitments specified in the Stipulation supported by most of the parties to the proceeding. Included in this Consolidated List is MEHC’s and PacifiCorp’s commitment regarding the filing of the enclosed Disclosure Statement. The parties to the Stipulation in Utah did not adopt Commitment No. 51; however, the commitment was adopted by the other five states in PacifiCorp’s service territory.

The Utah parties chose not to adopt commitments surrounding the transfer of the Intermountain Geothermal resource due to the tax dispute with the Committee of Consumer Services in Docket No. 05-035-98. The settlement of the tax matter was a condition precedent and gave rise to the effectiveness of these commitments in the other states. We are providing to the Commission the Disclosure Statement filed with the Wyoming Public Service Commission for informational purposes. Commitment 51 provides that:

51) ...No more than six months after the close of the transaction, MEHC will provide parties a clear and complete disclosure statement that details any potential liabilities and risks, identified by or for MEHC, associated with the ownership rights on MEHC in Intermountain Geothermal. MEHC also commits that PacifiCorp customers will not be harmed from the contribution to PacifiCorp of the Intermountain Geothermal steam resources and stock.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this Notice be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com; Dave.Taylor@PacifiCorp.com; and Dean.Brockbank@PacifiCorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 300
Portland, OR 97232

Informal inquiries may be directed to me or to Dave Taylor at 220-2923.

Sincerely,

Dean S. Brockbank
Sr. Counsel

Enclosure

cc: Service List 05-035-54
cc: Artie Powell, Division of Public Utilities
cc: Cheryl Murray, Committee of Consumer Services