

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

September 21, 2006

Public Service Commission of Utah
Heber M. Wells Building
160 East 300 South
Salt Lake City, Utah 84145

Re: Compliance Filing Pursuant to Commitment U-31 of Docket 05-035-54: PacifiCorp's Status Report on Achieving the 400 MW Target of New Renewable Resources.

Commissioners:

Pursuant to Commitment U-31 of Docket 05-035-54, PacifiCorp (dba Rocky Mountain Power) submits for filing an original and five copies of the enclosed status report on achieving the 400 MW target of new renewable resources in PacifiCorp's generation portfolio by December 31, 2007. An electronic version of this filing will be provided to mlivingston@utah.gov.

In its order issued January 27, 2006, the Commission approved the acquisition of PacifiCorp by MidAmerican Energy Holdings Company, subject to 50 general and 28 Utah specific commitments. On March 14, 2006, the Commission approved an amended stipulation that modified 20 commitments and incorporated an additional 20 new commitments including Commitment U-31. Specifically, Commitment U-31 provides that:

U 31. To the extent available, MEHC and PacifiCorp commit to have 400 MW of cost effective new renewable resources in PacifiCorp's generation portfolio by December 31, 2007. The 400 MW will include Wolverine Creek (64.5 MW) and Cove Fort (42 MW). MEHC and PacifiCorp will analyze the projects consistent with applicable regulatory rules and orders in effect at the time and as informed by the IRP. Resource identification shall be performed using an RFP procedure. If PacifiCorp fails to meet this 400 MW target it will disclose to signatories (excluding any bidders and affiliates of bidders) the cost-effectiveness analysis it used when rejecting the lowest cost projects. PacifiCorp shall file a report, on the status of meeting this target, with the Commission no later than six months after close of the transaction. In evaluating acquisition of renewable energy, all other things being equal, MEHC and PacifiCorp will not prefer ownership of facilities.

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

By E-mail (preferred): datarequest@pacificorp.com

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

If you have informal inquiries or would like to request a copy of the filing, please contact Dave Taylor, Regulatory Manager, at (801) 220-2923.

Sincerely,

D. Douglas Larson
Vice President, Regulation

Enclosure
cc: Service List 05-035-54(w/o enclosure)