



201 South Main, Suite 2300  
Salt Lake City, Utah 84111

September 4, 2007

**VIA OVERNIGHT DELIVERY**

Public Service Commission of Utah  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, UT 84111

Attn: Julie Orchard  
Commission Secretary

RE: Docket No. 05-035-54  
Compliance Filing Pursuant to Commitments U6 and U7 of Stipulation Appendix A,  
Consolidated List of Commitments

Dear Ms. Orchard:

PacifiCorp hereby submits for filing an original and five (5) copies of Implementation Plan – Corporate Presence and Staffing Commitments (“Implementation Plan”). This Implementation Plan is being provided in compliance with State-specific Commitments U6 and U7, pursuant to the Commission Order granting approval of the acquisition of PacifiCorp by MidAmerican Energy Holdings Company, issued March 14, 2006, in the referenced proceeding.

The Commission approved the acquisition of PacifiCorp by MEHC, subject to a Consolidated List of Commitments specified in a settlement agreement supported by all parties to the proceeding. Included in this consolidated list is MEHC’s and PacifiCorp’s commitment regarding the filing of the enclosed Implementation Plan. The commitments state:

U 6. PacifiCorp and MEHC commit to increasing the number of corporate and senior management positions in Utah to better reflect the relative size of Utah’s retail load compared to the retail loads of the other states. Positions to be examined will include, but not be limited to, engineering, purchasing, information technology, land rights, legal, commercial transactions and asset management. By September 1, 2007, MEHC and PacifiCorp will file a plan with the Commission that explicitly sets forth: (1) senior management positions (and associated corporate personnel positions identified by those senior managers) that have been identified for location in Utah; (2) the timeframe for implementing different stages of the plan; and (3) an economic analysis supporting the cost effectiveness of the plan. MEHC will promptly implement the plan pursuant to the timeframe.

U 7. PacifiCorp and MEHC will authorize senior management personnel located in Utah to make decisions on behalf of PacifiCorp pertaining to (1) local Utah retail customer service issues related to tariff interpretation, line extensions, service additions, DSM

program implementation and (2) customer service matters related to adequate investment in and maintenance of the Utah sub-transmission and distribution network and outage response. For resource transactions in Utah related to special retail contracts and QF contracts, PacifiCorp and MEHC will authorize Utah-based personnel to negotiate contract terms consistent with system-wide prudent practices. Such decisions will be subject to normal and prompt corporate approval procedures, senior executive approval and board approval, as appropriate. MEHC and PacifiCorp will include a description of the implementation of this commitment in the filing required in Commitment U 6.

By copy of this letter, other parties to the proceeding are being provided notice of this filing.

If there are informal inquiries concerning the filing, please contact Dave Taylor, Utah Regulatory Affairs Manager, at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation

Enclosure

cc: Service List 05-035-54 (w/out enclosures)  
Division of Public Utilities (with enclosure)  
Committee of Consumer Services (with enclosure)