



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

March 22, 2007

Public Service Commission of Utah
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84110

Attn: Ms. Julie Orchard
Commission Secretary

Docket No.: In the Matter of the Application of ROCKY MOUNTAIN POWER for an
Exemption under Subsection 54-4-31(4) of the Utah Code Annotated.

Dear Commissioners:

Please find attached the application of PacifiCorp, doing business as Rocky Mountain Power (the Company), in the named matter requesting an order of the Commission granting an exemption from the requirements of Subsection 54-4-31(1) of the Utah Code Annotated pursuant to Subsection 54-4-31(4) thereof. An original and 15 copies are attached hereto.

The Commission previously granted such an exemption to the Company in Docket Nos. 98-2035-02 and 00-035-16, copies of which are attached as Exhibit A to the application. However, in connection with the Commission's approval of the acquisition by MidAmerican Energy Holdings Company in Docket No. 05-035-4, the Commission required the Company to apply for approval of securities issuances, but agreed that the Company could seek a waiver of that requirement 12 months after the closing of the acquisition. (See Exhibit B to the application for a copy of Commitment U12.) The acquisition closed on March 21, 2006.

The Company continues to believe that the proposed exemption will reduce administrative burdens on the Commission, its Staff and the Company without adversely affecting the flow of information to the Commission concerning the Company's securities transactions. No concerns have arisen subsequent to the acquisition by MidAmerican Energy Holdings Company to indicate that the exemption is inappropriate. In addition, the exemption will have no effect on any utility rate-making issues and the Commission will retain its ability to determine the appropriate regulatory treatment of the Company's securities transactions in subsequent proceedings. Accordingly, the application of Subsection 54-4-31(1) of the Utah Code continues not to be required in the public interest.

The Company respectfully requests the Commission's action on this issue by April 30, 2007. The Company requests twelve (12) copies of any order issued in this matter.

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

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

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

By fax: (503) 813-6060

The name, address, and telephone number of additional persons authorized to receive notices and communications are included in the application.

Sincerely,

Bruce N. Williams
Vice President and Treasurer

Attachments:
Application
Draft Order