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Salt Lake City, Utah 84111

March 27, 2008

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

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84111

Attention: Julie P. Orchard  
Commission Secretary

RE: Advice No. 08-02  
Schedule 70 – Renewable Energy Rider – Optional  
Schedule 72 – Renewable Energy Rider – Optional  
Bulk Purchase Option

Enclosed for filing are an original and two copies of proposed tariff changes associated with Tariff P.S.C.U. No. 47 of Rocky Mountain Power applicable to electric service in the State of Utah. Pursuant to the requirements of Rule R746-405-2D, PacifiCorp (the “Company”) states that the proposed tariff sheets do not constitute a violation of state law or commission rule. The Company will also provide an electronic version of this filing to [tbehr@utah.gov](mailto:tbehr@utah.gov). The Company is requesting an effective date of April 27, 2008.

First Revision of Sheet No. 70.4	Schedule 70	Renewable Energy Rider – Optional
First Revision of Sheet No. 72.4	Schedule 72	Renewable Energy Rider – Option Bulk Purchase Option

On March 27, 2007, the Company filed proposed revisions to the Blue Sky Program Schedules 70 and 72. As a result of comments received from the Committee of Consumer Services and Utah Clean Energy, on June 22, 2007, the Company submitted replacement tariff sheets which included the following paragraph to address third party certification of Renewable Energy Credits (RECs):

5. Beginning January 1, 2008, all RECs purchased under this program must be registered with the Western Renewable Energy Generation Information System (WREGIS), if WREGIS is operational.

This language was subsequently approved by the Commission in its September 6, 2007 Order in Docket No. T-035-T13.

Rocky Mountain Power is proposing to modify the above paragraph as follows:

5. Beginning January 1, 2008, all RECs purchased under this program must be registered with the Western Renewable Energy Generation Information System (WREGIS), if ~~WREGIS is operational~~ available and at a cost competitive with RECs not registered through WREGIS.

The Company is very supportive of using WREGIS. This support was demonstrated by the fact that PacifiCorp was the first Qualified Reporting Entity to register its renewable generation with WREGIS. Of the 96 renewable generation facilities currently registered with WREGIS, over half, i.e. 50, are owned or under contract by PacifiCorp. The purchase of RECS on behalf of Blue Sky program participants is typically made several times throughout the year. Currently, the Company is attempting to purchase RECs equivalent to the participants' block purchases for the first quarter 2008 and into the next months, a purchase of approximately 50,000 to 100,000 RECs. Rocky Mountain Power, however, has not been able to secure for purchase any RECs registered through WREGIS for the program year 2008.

With WREGIS operations in their infancy, in addition to lack of registered RECS available to the Company for purchase, the small number of generation facilities registered and the small amount of RECs produced by those registered with WREGIS, is not sufficient to indicate at what point in time WREGIS-registered RECs will be available on the market, and at what price point the RECs would be offered. To ensure the continued integrity and viability of Rocky Mountain Power's Blue Sky program, the Company is requesting approval of the proposed tariff sheets.

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

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

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

By fax: (503) 813-6060

Informal inquiries may be directed to Dave Taylor at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation  
Enclosures