



*Yvonne R. Hogle
Senior Counsel
One Utah Center
201 S. Main Street, Suite 2300
Salt Lake City, UT 84111
801.220.4050
801.220.3299 Fax*

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VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, Utah 84114

Attn: Julie P. Orchard,
Commission Secretary

**RE: Docket No. 09-2035-01
PacifiCorp's 2008 Integrated Resource Plan (2008 IRP)**

Dear Ms. Orchard:

The purpose of this letter is to respond to the comments filed by the Division of Public Utilities (Division) on March 25, 2009 and by the Committee of Consumer Services (Committee) on March 31, 2009 related to the 2008 IRP including PacifiCorp's (Company) proposed filing date thereof.

In their comments, the Division and the Committee recommend that that the Public Service Commission of Utah (Commission) require the Company to file the 2008 IRP with the Commission April 6, 2009 and April 8, 2009, respectively, for formal review. Further the Division and the Committee recommend that the Commission establish a comment period of at least 30 days and 60-90 days, respectively, subsequent to the filing date. The Company is opposed to the foregoing recommendations for the following reasons:

1. The draft of the 2008 IRP that the Company will be circulating on April 8, 2009 to the parties (2008 IRP April Draft), including the Division and the Committee, will not have gone through a final senior management review. Senior management will not have approved the 2008 IRP April Draft. Therefore, the 2008 IRP April Draft should not be subjected to the formal acknowledgment or review process.
2. The 2008 IRP April Draft does not include any stakeholder comments from Utah and other jurisdictions.
3. Under Utah IRP Acknowledgment Guideline 5, PacifiCorp is required to "submit the IRP for public comment, review, and acknowledgment". Historically, Utah parties and PacifiCorp have interpreted this to mean that a sufficient review and comment period for the IRP draft be

provided before filing. In fact, in the past, Utah parties have complained when the review period is shorter than 30 days. PacifiCorp would be noncompliant with respect to Guideline 5, and other Utah parties not involved in the scheduling controversy would be deprived of the opportunity to review and comment on the 2008 IRP April Draft.

4. The 2008 IRP April Draft will not include the wind integration cost appendix as the Company has not yet completed the appendix.

5. The status of PacifiCorp's "final" 2008 IRP for Utah acknowledgment is not clear. It would be an administrative burden on the Company and on the Commission to require the Company to prepare and submit a 2008 IRP update at a later date. For example, the Company does not know if such an update would prompt another round of comments by Utah parties.

The Company also opposes the Division's recommendation to the Commission that it adopt a January 1 filing date for all subsequent IRPs and interim updates for the following reasons:

1. Adopting the Division's recommendation would effectively mean abandoning a significant portion of the IRP/business plan alignment benefits. The IRP must be completed by late October to meet a January 1 filing deadline and the final business plan iterations are underway at that time. Consequently, the IRP preferred portfolio will likely differ from the business plan portfolio.

2. Similarly, the IRP action plan could be inconsistent with elements of the business plan, which goes against the intent of IRP Guideline 3e which requires "[a]n action plan outlining the specific resource decisions intended to implement the integrated resource plan in a manner consistent with the Company's strategic business plan."

3. Finally, the Washington commission has already formally approved a March 31 filing date for all subsequent IRP filings. Adopting a different filing schedule in Utah will complicate the public process and make regulatory coordination difficult.

The Company acknowledges that it failed to comply with its own schedule set on June 11, 2008. Nevertheless, adopting the Committee's and Division's recommendations would not be beneficial for anyone because the 2008 IRP April Draft is a draft, is incomplete and has not been approved by senior management. The Company respectfully requests that the Commission allow it to finalize its draft as soon as possible, and to file its final 2008 IRP May 29, 2009. Adopting the recommendations of the Committee and the Division will only serve to delay the process.

Sincerely,

Yvonne R. Hogle
Senior Counsel

cc: Pete Eelkema
Mark C. Moench