

January 8, 2010

***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. 10-01  
Schedule 70 - Renewable Energy Rider - Optional (Blue Sky Block Program)  
Schedule 72 - Renewable Energy Rider - Optional Bulk Purchase Option  
(Blue Sky Bulk Program)

Enclosed for filing are an original and two copies of proposed tariff sheets associated with Tariff P.S.C.U No. 47 of PacifiCorp, d.b.a Rocky Mountain Power, applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405D, Rocky Mountain Power (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 respectfully requests an effective date of February 8, 2010 for these changes.

Second Revision of Sheet No. 70.2	Schedule 70	Renewable Energy Rider - Optional
Third Revision of Sheet No. 72.2	Schedule 72	Renewable Energy Rider - Optional Bulk Purchase Option

Through this filing, the Company is requesting the addition of a specific generation technology to the list of resources that are eligible for support under the Blue Sky program. Rocky Mountain Power's Blue Sky program allows customers in Utah the opportunity to support the development of renewable energy beyond what is included in the Company's general resource portfolio. Through the Blue Sky program, the Company purchases renewable energy credits ("RECs") to match customer subscriptions. Funds remaining after purchasing RECs to satisfy customer subscriptions and covering program administrative costs may be used to fund community based renewable energy projects. Customer support for the program has been considerable with National Renewable Energy Laboratory ranking the program #3 nationally in 2008 among utility green pricing programs for renewable energy sales and total number of customer participants.<sup>1</sup>

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<sup>1</sup> <http://www.nrel.gov/news/press/2009/679.html>

The Renewable Energy section in Schedules 70 and 72 list the renewable energy technologies eligible for support through the Blue Sky program. The Company has recently become aware of a hydro generation technology that is not eligible for support through the program under current program tariffs. Turbines installed in water pipelines and irrigation canals are able take advantage of energy that would otherwise be wasted. Many water and irrigation systems utilize pressure reducing valves to control pressure as water flows from higher to lower elevation zones. These valves can be replaced with or substituted by hydro turbines which accomplish the same task and convert the reduction in pressure to electricity. These turbines have no negative impact on water quality relative to the pressure reducing valves and therefore should be considered equivalent to other Blue Sky eligible hydro resources with regard to environmental impact. In addition, generation systems using this technology are certifiable by Green-e Energy.

Under the current program tariffs, hydro generation projects are eligible for program support only if they are certified by the Low Impact Hydropower Institute (LIHI) or are wave or tidal action projects. While pipeline and irrigation canal generation systems are LIHI certifiable, the administrative burden and cost to obtain certification is often prohibitive for smaller facilities. The Company believes that by adding this generation technology to the list of program eligible resources, development of and investment in this clean and renewable energy technology will be advanced. Further, the Company believes that adding these facilities to the list of Blue Sky program eligible resources is in alignment with the program's objective to enable customers the opportunity to support the further development of renewable energy resources in the western region.

It is respectfully requested that all formal correspondence and staff requests regarding this matter 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 Blvd., Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Dave Taylor, manager of Utah regulatory affairs, at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation

Enclosure