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January 8, 2013

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

Attn: Gary Widerburg
Commission Secretary

RE: PacifiCorp's 2013 Integrated Resource Plan (IRP) – Request for Filing Extension

Dear Mr. Widerburg:

PacifiCorp is filing a request for extension of the filing of its 2013 IRP due to recent actions by the U.S. Environmental Protection Agency (EPA) that are beyond the company's control as further described below.

The EPA's proposed action on the Arizona Regional Haze State Implementation Plan (SIP) was published in the Federal Register on July 20, 2012. While the Arizona Regional Haze SIP concluded that the low-nitrogen oxide burners at PacifiCorp's Cholla Unit 4 were sufficient to meet the Best Available Retrofit Technology requirements under the Clean Air Act, the July 20, 2012, EPA's proposal required the installation of selective catalytic reduction at an emission rate of 0.05 pounds per million British thermal unit for Cholla Unit 4. On December 5, 2012, the EPA approved in part and disapproved in part Arizona's Regional Haze SIP, revising the proposed emission limits for Cholla Unit 4 to include emissions averaging at a rate of 0.055 pounds per million British thermal unit with Cholla Units 2 and 3 (which are owned and operated by Arizona Public Service). The Cholla Unit 4 emissions control requirements and associated assumptions will now be captured in PacifiCorp's 2013 IRP base case modeling runs.

In Wyoming, pursuant to a Consent Decree entered by the United States District Court for the District of Colorado (Court) on September 27, 2011 (Dkt. No. 67), the EPA was required to take final action on the Wyoming Regional Haze SIP by October 15, 2012. That Consent Decree deadline was moved to December 14, 2012, by EPA with agreement of WildEarth Guardians, party to the Consent Decree. On December 10, 2012, the EPA filed an unopposed motion to again modify the Consent Decree deadlines for taking action on the Wyoming Regional Haze SIP. EPA's motion sought to modify the Consent Decree to allow it to re-propose, on or before March 29, 2013, a rule to govern compliance with Regional Haze implementation plan requirements under the Clean Air Act for the state of Wyoming. On December 13, 2012, the

Court granted EPA's request for an extension. Consistent with EPA's request, EPA now has until March 29, 2013 to re-propose a Regional Haze implementation plan compliance rule and until September 27, 2013 to take final action on the rule. EPA will be evaluating new cost and visibility analyses for several of PacifiCorp's units and will take public comment on the new information.

After revision of the October 15, 2012, deadline for EPA's action and in anticipation of the EPA's revised deadline of December 14, 2012, to take final action on the Wyoming Regional Haze SIP, PacifiCorp suspended the modeling work it was doing in preparation of the 2013 IRP, intending to re-start the modeling once EPA's final action was made available and its impacts were assessed. PacifiCorp was concerned that it would not be an efficient use of time and resources to continue to perform its modeling based on a set of assumptions that could almost immediately change as a result of EPA's final action. PacifiCorp's intention was to incorporate the latest information from EPA's final action into the IRP modeling.

Given that EPA has now requested and received additional time to re-propose action on the Wyoming Regional Haze SIP and that the re-proposed action will not be undertaken in sufficient time to allow PacifiCorp to incorporate those results into its modeling, no modifications to the base case Regional Haze compliance assumptions for Wyoming are necessary, and PacifiCorp will re-initiate its modeling efforts for the 2013 IRP. The Company will include the EPA's previously proposed action on the Wyoming SIP in the 2013 IRP stringent case modeling runs.

PacifiCorp will modify its base case Regional Haze compliance assumptions for the 2013 IRP to incorporate EPA's final actions on the Arizona Regional Haze SIP, to include the addition, by the end of 2017, of a selective catalytic reduction system on Unit 4 of the Cholla plant.

In addition, PacifiCorp will update its forward price curve information so that base case assumptions align with the September 2012 official forward price curve, rather than the June 2012 official price curve, as well as with the most current projections of high and low natural gas prices and coal costs.

Based on the foregoing recent developments, PacifiCorp respectfully requests a one-month extension of the filing of its 2013 IRP for a new filing date of April 30, 2013. This extension will ensure that stakeholders have reasonable time to review the 2013 IRP model results prior to selecting a preferred portfolio and prior to the filing of the 2013 IRP.

PacifiCorp respectfully requests that all formal correspondence and Staff requests regarding this filing be addressed to the following:

By E-mail: datarequest@pacificorp.com

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

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If there are informal inquiries concerning this filing, please contact Pete Warnken, Manager Integrated Resource Planning at (503) 813-5518 or Dave Taylor, Utah Regulatory Affairs Manager at (801) 220-2923.

Sincerely,

Yvonne R. Hogle

Senior Counsel

cc: Service List 11-2035-01

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of January, 2012, a true and correct copy of the foregoing was served upon the following as indicated below:

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