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August 19, 2016

**VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY**

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

Attn: Gary Widerburg
Commission Secretary

**RE: Docket No. 15-035-04
Supplement to PacifiCorp's 2015 Integrated Resource Plan Update – Reply
Comments**

Dear Mr. Widerburg:

Rocky Mountain Power, a division of PacifiCorp (“PacifiCorp” or the “Company”) hereby supplements its two sets of Reply Comments, filed with the Public Service Commission of Utah (“Commission”) August 8, 2016 to respond to comments filed by the Utah Office of Consumer Services (“OCS”) addressing 1) PacifiCorp’s 2015 Integrated Resource Plan Update (“IRP Update”) and 2) PacifiCorp’s Request for Waiver of Requirement to Include Business Plan as a Sensitivity Case in Subsequent IRPs (“Request for Waiver”).

PacifiCorp appreciates the comments filed by the OCS. Unfortunately, due to incomplete service the Company’s Reply Comments omitted a response thereto. The Company responds to the OCS’s comments below.

OCS Comments on 2015 IRP Update

The OCS’s comments on the 2015 IRP Update focused on two primary changes from the 2015 IRP Update compared to the 2015 IRP, including 1) PacifiCorp’s updated analysis regarding Naughton 3 and Cholla 4 and 2) its plans to issue renewable resource and Renewable Energy Credit (“REC”) Requests for Proposals (“RFPs”) to take advantage of the extension of the federal production tax credit and investment tax credits. The OCS commented that it looks forward to the

Company's updated analysis on the Naughton 3 and Cholla 4 units which the Company has committed to include as part of its 2017 IRP cycle. The OCS also requested the Company include information on the effect retirement of these units may have on the transmission system; which topic will be considered in the 2017 IRP cycle.

OCS Comments on Request for Waiver

Regarding PacifiCorp's Request for Waiver ("Waiver Request"), the OCS explains that it "believes the directive from the Commission is still a very necessary requirement and that the Company must continue to provide analyses of the Business Plan as part of its IRP filings." (OCS comments at page 2). To that extent, the OCS recommends the Commission deny the Waiver Request and instead require the Company to propose an alternative solution for the issues it raised in its Waiver Request. Specifically, "an alternative that protects business-sensitive information but also allows for regulatory oversight of the Business Plan's impact on the IRP." (OCS comments at page 2).

Reply Comments

Regarding the RFPs, the Company issued renewable resource and REC RFPs to explore potential procurement opportunities that could be used to meet renewable portfolio standard ("RPS") requirements in California, Oregon, and Washington. The RFPs were issued April 11, 2016 and the Company has completed its bid evaluation process. Based upon bids received, the Company will not be pursuing any renewable resource acquisitions as a result of the resource RFP. The Company is moving forward with executing REC purchase agreements. The REC purchases will be used to meet RPS requirements in California, Oregon, and Washington, and the cost of these REC purchases will be passed through to customers in those states. The Company will also include information regarding any analysis on the effect retirement of Naughton 3 and Cholla 4 may have on the transmission system.

Regarding the Waiver Request, PacifiCorp believes it has satisfied the OCS's request with its proposal outlined in PacifiCorp's Reply Comments. Generally, PacifiCorp proposes to include a comparison in its 2017 IRP and future IRPs that focuses on the relevant action plan comparison between the IRP and the Business Plan, specifically the first three years. The first two years of the action plan reflects the resource decisions the Company plans to make and the following two years reflect what the Company anticipates may happen. PacifiCorp therefore proposes including the first three years as a balance between its resource acquisition plans and anticipated resource acquisition decisions. This approach would ensure that the Company's near-term resource acquisition decisions are transparent and discussed in the context of the IRP near-term action plan. Updating this comparison each IRP cycle provides ongoing certainty and consistency among the plans for stakeholders. The Company's specific proposal is outlined in its Reply Comments.

Any informal questions should be directed to Shay LaBray, Manager, Resource Strategy at (503) 813-6176.

Sincerely,



Yvonne R. Hogle
Assistant General Counsel

Cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 19th day of August, 2016, a true and correct copy of the foregoing **2015 Integrated Resource Plan Update – Supplement to Reply Comments** was served upon the following as indicated below:

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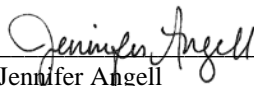
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