

April 11, 2005

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Julie P. Orchard
Commission Secretary

Re: Advice Filing 04-13 – Docket No. 98-2035-04

PacifiCorp (d.b.a. Utah Power & Light Company) hereby submits for filing an original and two copies of modifications to Advice Filing 04-13 with regard to performance standards to reflect the Division of Public Utilities' (Division) recommended changes as outlined in the Division's memorandum to the Commission dated February 23, 2005. The specific modifications to Advice Filing 04-13 are shown below.

The last part of the paragraph headed "Description of Modified Customer Service Performance Standards" on Page 8 of Advice Filing 04-13 should be changed to reflect the fact that the Company will resolve at least 95% of Commission complaints within 5 business days in Utah and will resolve 100% of Commission complaints within 30 calendar days in Utah.

A clarification should be added after the first sentence in the paragraph headed "Network Performance Standard 3" on Page 7 of the above advice filing to say "After no more than an additional three years, the Company will measure the current CPI score for its targeted 20% improvement." The first part of this paragraph will now read "The Company will continue to select a maximum of five under-performing circuits in Utah on an annual basis and will undertake corrective measures to reduce the circuit performance indicator (CPI) by 20% within two years. After no more than an additional three years, the Company will measure the current CPI score for its targeted 20% improvement..."

In addition to the two wording changes described above, the Company agrees to track the number of customers whose power was disconnected for non-payment and the length of time it takes to switch their power back on. This information will be reported to the

Commission on an annual basis. The Company also agrees to provide quarterly reports on the Customer Guarantees to the Commission on a quarterly basis in Utah. Both of these changes were recommended by the Division in their February 23, 2005 memorandum to the Commission.

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

By E-mail (preferred): datarequest@pacificorp.com

By Fax: (503) 813-6060

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah St., Suite 800
Portland, OR 97232

Informal inquiries may be directed to Carole Rockney at (503) 813-7408.

Sincerely,

D. Douglas Larson
Vice President, Regulation

Enclosures