



March 31, 2008

**VIA ELECTRONIC FILING**

Ms. Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

**Re: Docket No. UE-080111, Rulemaking to Implement Greenhouse Gases Emissions Performance Standard – RCW 80.80.060**

Dear Ms. Washburn:

In response to the Washington Utilities and Transportation Commission's ("Commission") February 8, 2008 Notice of Opportunity to File Written Comments on Proposed Rules ("February 8 Notice"), PacifiCorp, dba Pacific Power ("PacifiCorp" or the "Company"), respectfully submits the following comments on the Commission's proposed rules to implement Greenhouse Gases Emissions Performance Standard ("EPS").

PacifiCorp is an integrated electric utility serving approximately 1.7 million customers in six western states. In Washington, the company serves more than 124,000 customers in the Walla Walla and Yakima areas.

Environmental RESPECT is one of PacifiCorp's core business principles and governs our business practices. The Company is working hard to reduce its carbon intensity through operational improvements and diversification of its generation portfolio. Notably, PacifiCorp is one of the largest utility owners of renewable energy projects in the United States.

The Company worked closely with legislators and stakeholders to craft an informed and rational policy by testifying at public hearings on Engrossed Senate Substitute Bill 6001 ("SB 6001"), providing written comments and testimony to legislators considering the policy, and generally participating in many meetings leading up to enactment of SB 6001. The Company appreciates the opportunity to participate in this proceeding.

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PacifiCorp has reviewed the proposed rules and does not have any substantive comments at this time. The Commission's discussion draft appears to reflect the intent of SB 6001 to allow a utility to request a determination, or "pre-approval", from the Commission as to whether a proposed long-term financial commitment complies with the EPS. Importantly, PacifiCorp respectfully requests that the Commission not perceive the absence of comments by PacifiCorp on any particular issue or other matter as a conclusive indication of PacifiCorp's support or opposition with respect thereto. PacifiCorp acknowledges the ongoing nature of the issues in this proceeding and reserves the right to present additional comments at a future time, as necessary

PacifiCorp looks forward to working with Commission staff and other interested parties in this proceeding. PacifiCorp will continue to monitor and review all comments submitted in this proceeding, including any updated versions of the proposed rules as they become available.

Sincerely,

/s/

Andrea L. Kelly  
Vice President, Regulation