

January 18, 2011

VIA ELECTRONIC FILING

Washington Utilities and Transportation Commission
P.O. Box 47250
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Attention: David W. Danner
Executive Director and Secretary

**Re: Docket No. A-101466, Notice of Opportunity to File Written
Comments on Adoption-by-Reference Rule Revisions in Title 480
WAC**

PacifiCorp, d.b.a. Pacific Power (or "Company") submits the following response in accordance with the Washington Utilities and Transportation Commission Notice of Opportunity to File Comments issued in Docket A-101466 on November 5, 2010.

At this time, Pacific Power has no comments on the proposal to revise adoption-by-reference dates to reflect the most current published versions of adopted publications as well as other minor administrative changes, but reserves the right to comment over the course of this proceeding.

Pacific Power appreciates the opportunity to provide information. If you have any questions regarding this submittal, please contact Jon Christensen, Regulatory Manager, at (503) 813-5269.

Sincerely,



Andrea L. Kelly
Vice President, Regulation

Enclosure