

September 28, 2011

***VIA ELECTRONIC FILING***

***AND OVERNIGHT DELIVERY***

Washington Utilities and Transportation Commission

1300 S. Evergreen Park Drive, S.W.

P.O. Box 47250

Olympia, Washington 98504-7250

Attn: David W. Danner

 Executive Director and Secretary

**RE:** **Docket No. U-111663 – Comments**

**In the Matter of the Petition of Puget Sound Energy, Inc. For a Declaratory Order on the Extra Credits for Apprentice Labor Provision of RCW 19.285.040(2)(h)**

Dear Mr. Danner:

PacifiCorp, d.b.a. Pacific Power & Light Company (PacifiCorp or Company), submits the following in accordance with the Washington Utilities and Transportation Commission’s (Commission) Notice of Receipt of Petition for Declaratory Order and Opportunity to Submit Statements of Fact and Law (Notice) issued in Docket U-111663 on September 20, 2011. PacifiCorp is commenting to express support for the arguments set forth in the petition filed by Puget Sound Energy, Inc. (PSE). PacifiCorp believes that the outcome of this proceeding could be precedential with respect to future application of apprenticeship labor credits toward compliance with Washington’s Energy Independence Act, Chapter 19.285 RCW (Act). Further, although PacifiCorp has not applied for certification to use apprentice labor in the construction of renewable generation facilities, it may desire to do so in the future. As such, PacifiCorp shares the concerns expressed by PSE with respect to certain parties’ limited interpretation of the Act. Therefore, PacifiCorp recommends that the Commission issue a declaratory order in this proceeding and grant the relief requested by PSE.

Notwithstanding the foregoing, PacifiCorp requests to be placed upon the Commission’s service list in the event of further proceedings and reserves the right to provide further comments at a later date. Informal questions should be directed to Andrea Kelly at (503) 813-6043.

Sincerely,

Andrea L. Kelly

Vice President, Regulation