

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

CERTIFICATE OF SERVICE

I certify that I have cause to be served the foregoing document, via E-mail, to the following:

Puget Sound Energy

Donna Barnett
10885 NE Fourth Street, Suite 700
Bellevue, WA 98004
dbarnett@perkinscoie.com

Office of the Attorney General

Simon ffitch
800 5th Avenue – Suite 2000
Seattle WA 98104-3188
simonf@atg.wa.gov

WUTC-Assistant Attorney General

Frona Woods
PO Box 40128
Olympia, WA 98504
fwoods@utc.wa.gov

Puget Sound Energy

PO Box 97034
Bellevue, WA 98009-9734

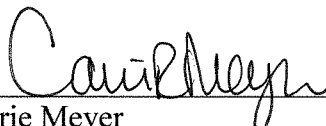
Puget Sound Energy

Sheree Carson
10885 NE Fourth Street, Suite 700
Bellevue, WA 98004
scarson@perkinscoie.com

PacifiCorp

825 NE Multnomah, Suite 2000
Portland, OR 97232
washingtondockets@pacificorp.com

DATED this 28th day of September, 2011



Carrie Meyer
Coordinator, Regulatory Operations