

September 14, 2009

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

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

Attention: David W. Danner
Executive Director and Secretary

RE: Notice of Intent Not to File a Request for Proposals Pursuant to WAC 480-107

Dear Mr. Danner,

PacifiCorp, d.b.a. Pacific Power (“PacifiCorp” or “Company”), submits an original and two copies of its notice to the Washington Utilities and Transportation Commission (“Commission”) that the Company does not intend to file a Request for Proposals (“RFP”) pursuant to WAC 480-107 in 2009 because the Company’s 2008 Integrated Resource Plan (“IRP”) demonstrates additional capacity will not be needed in the west control area until 2012¹.

WAC 480-100-238(4) requires an IRP to be filed every two years. Pursuant to WAC 480-100-238(4) and consistent with Order No. 2 issued in Docket UE-070117, the Company submitted its 2008 IRP on May 29, 2009. WAC 480-107-015(3)(b) requires submission of a proposed RFP and supporting documentation to the Commission no later than 135 days after an IRP is filed. However, WAC 480-107-015(3)(a) provides that if the IRP demonstrates additional capacity will not be needed within three years, the solicitation process requirements of WAC 480-107 do not apply. According to the 2008 IRP, based on a 12% planning reserve margin, additional capacity will not be needed for the Company’s west control area until 2012 (on a system-wide basis, additional capacity will not be needed until 2011²). Because the 2008 IRP demonstrates no additional capacity will be needed within three years, the Company does not intend to submit an RFP consistent with WAC 480-107-015(3)(a).

¹ Chapter 5 – Resource Needs Assessment, Table 5.18, section “West” on page 91 (2008 IRP, Docket UE-080826)

² Chapter 5 – Resource Needs Assessment, Table 5.18, section “System” on page 91 (2008 IRP, Docket UE-080826)

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All formal correspondence and Staff requests regarding this filing should be directed to:

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

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Any informal inquiries should be directed to Cathie Allen, Regulatory Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in black ink that reads "Andrea L. Kelly /ca". The signature is written in a cursive style.

Andrea L. Kelly
Vice President, Regulation

cc: Deborah Reynolds, Washington Utilities & Transportation Commission
Steve Johnson, Washington Utilities & Transportation Commission

is caused by the expected expiration of the West Valley lease agreement. The slight increase in 2009 is due to executed front office transactions and an increase in the curtailment portion of the Monsanto contract. The large decrease in 2012 is primarily due to the expiration of the BPA peaking contract in August 2011. Additionally, Figure 5.4 highlights a decrease in obligation in the west starting in 2014 attributable to the expiration of the Sacramento Municipal Utility District and City of Redding power sales contracts.

Table 5.18 – System Capacity Loads and Resources (12% Target Reserve Margin)

Calendar Year		2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
East											
Thermal		5,983	5,998	6,025	6,066	6,066	6,078	6,079	6,087	6,088	5,863
Hydro		135	135	135	135	135	135	135	135	135	135
DSM		345	395	435	465	475	485	495	505	515	525
Renewable		157	157	157	157	157	157	154	154	154	154
Purchase		751	546	541	341	341	341	341	320	320	320
QF		151	151	151	151	151	151	151	151	151	151
Interruptible		237	237	237	237	237	237	237	237	237	237
Transfers		1,150	952	602	422	440	230	490	504	265	414
East Existing Resources		8,910	8,572	8,284	7,975	8,003	7,814	8,082	8,093	7,865	7,800
Load		6,757	6,949	7,150	7,404	7,643	7,779	8,029	8,303	8,491	8,696
Sale		781	768	758	747	745	745	745	745	659	659
East Obligation		7,538	7,717	7,908	8,151	8,388	8,524	8,774	9,048	9,150	9,355
Planning reserves		745	785	803	853	880	895	924	958	969	993
Non-owned reserves		70	70	70	70	70	70	70	70	70	70
East Reserves		815	855	874	923	951	966	995	1,029	1,040	1,063
East Obligation + Reserves		8,352	8,572	8,781	9,074	9,339	9,490	9,769	10,077	10,190	10,418
East Position		558	1	(498)	(1,099)	(1,336)	(1,676)	(1,686)	(1,984)	(2,325)	(2,619)
East Reserve Margin		19%	12%	6%	(1%)	(4%)	(8%)	(7%)	(10%)	(13%)	(16%)
West											
Thermal		2,550	2,559	2,568	2,579	2,591	2,591	2,591	2,591	2,577	2,577
Hydro		1,315	1,218	1,216	980	1,009	1,046	1,157	1,150	1,149	1,146
DSM		-	-	-	-	-	-	-	-	-	-
Renewable		90	96	96	90	90	90	90	90	90	90
Purchase		1,310	1,203	753	115	144	111	111	111	111	139
QF		120	120	120	120	120	120	120	120	120	120
Transfers		(1,152)	(953)	(603)	(422)	(442)	(228)	(489)	(504)	(263)	(415)
West Existing Resources		4,233	4,242	4,150	3,462	3,513	3,729	3,580	3,558	3,783	3,656
Load		3,393	3,422	3,490	3,587	3,638	3,722	3,769	3,824	3,893	3,978
Sale		499	490	290	258	258	258	158	108	108	108
West Obligation		3,892	3,912	3,780	3,845	3,896	3,980	3,927	3,932	4,001	4,086
Planning reserves		310	325	363	448	450	464	458	459	467	474
Non-owned reserves		7	7	7	7	7	7	7	7	7	7
West Reserves		316	332	370	454	457	471	464	465	473	480
West Obligation + Reserves		4,208	4,243	4,149	4,299	4,353	4,451	4,391	4,397	4,474	4,566
West Position		25	(1)	0	(837)	(840)	(721)	(811)	(839)	(691)	(909)
West Reserve Margin		13%	12%	12%	(10%)	(10%)	(6%)	(9%)	(9%)	(5%)	(10%)
System											
Total Resources		13,143	12,815	12,433	11,437	11,515	11,543	11,662	11,651	11,648	11,456
Obligation		11,430	11,628	11,687	11,996	12,284	12,504	12,701	12,980	13,151	13,441
Reserves		1,131	1,187	1,243	1,377	1,407	1,437	1,459	1,494	1,513	1,543
Obligation + Reserves		12,561	12,815	12,931	13,373	13,692	13,940	14,160	14,474	14,664	14,984
System Position		583	(0)	(498)	(1,936)	(2,176)	(2,397)	(2,498)	(2,823)	(3,016)	(3,528)
Reserve Margin		17%	12%	8%	(4%)	(6%)	(7%)	(8%)	(10%)	(11%)	(14%)