

April 8, 2011

***VIA ELECTRONIC FILING***

***AND OVERNIGHT DELIVERY***

Washington Utilities & Transportation Commission

1300 S. Evergreen Park Drive SW

P.O. Box 47250

Olympia, WA 98504-7250

Attention: David W. Danner

Executive Director and Secretary

**RE: Modification to PacifiCorp’s Annual Electric Reliability Monitoring and Reporting Plan pursuant to WAC 480-100-393**

Dear Mr. Danner:

Pursuant to WAC 480-100-393, PacifiCorp, d.b.a. Pacific Power (“Company”) respectfully submits to the Washington Utilities and Transportation Commission (“Commission”) modifications to the Company’s Annual Electric Reliability Monitoring and Reporting Plan (“Reporting Plan”). WAC 480-100-393 requires electric utilities to file a Reporting Plan, and modifications to Reporting Plans, with the Commission for purposes of monitoring and reporting electric service reliability information. Initial Reporting Plans and modifications to Reporting Plans must be accepted by the Commission. The Commission accepted the Company’s initial Reporting Plan in Docket No. UE-011443.

**Background**

On December 10, 2007, the Commission approved changes to the Company’s Reporting Plan. These changes were deemed necessary to produce annual electric service reliability reports that provide accurate, timely information on customer service reliability.

Additional desired changes to the Reporting Plan have been discussed with Commission staff members which are intended to further enhance the Company’s annual electric system reliability reports. The Company proposes to include definitions for a System Average Interruption Duration Index (“SAIDI”)-based major event and a System Average Interruption Frequency Index (“SAIFI”)-based major event. The Company also proposes to include additional performance information to report total performance, total performance excluding SAIDI-based major events, and total performance excluding SAIFI-based major events for each applicable reporting metric. Finally, the Company proposes to add a reference to its established 2003 baseline reliability statistics and include an example chart of history including those baselines.

Included as Attachment A is a copy of the modified Reporting Plan. Changes to the plan have been made on pages 4, 8, 10.

The purpose of this filing is to update the Company’s Reporting Plan. The Company respectfully requests review and approval of the Company’s modified Reporting Plan by April 30, 2011, which will enable the Company to file its 2010 report in the enhanced format on the May 1, 2011 filing date. The Company is prepared to file the Reporting Plan in the existing approved format if this modification request is not approved by April 30, 2011.

It is respectfully requested that all formal correspondence and staff requests regarding this filing be addressed to the following:

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

By regular mail: Data Request Response Center

PacifiCorp

825 NE Multnomah, Suite 2000

Portland, OR 97232

Please direct any informal questions to me at (503) 813-6043, or Heidi Caswell, Director, Network Performance, at (503) 813-6216.

Sincerely,

Andrea L. Kelly

Vice President, Regulation

Enclosures

c: Deborah Reynolds – WUTC

Attachment A

Washington Electric Reliability Annual Monitoring

and Reporting Plan