

October 4, 2010

VIA ELECTRONIC FILING

Washington Utilities and 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: UE-100865 Rulemaking to Implement Revisions to Greenhouse Gas Emissions Performance Statute RCW 80.80.060- Comments

Dear Mr. Danner:

On September 3, 2010, the Washington Utilities and Transportation Commission (Commission) issued a Notice of Opportunity to Submit Written Comments on Proposed Rules (Notice) in Docket UE-100865 requesting comments on proposed revisions to the Commission's greenhouse gas emissions performance standard rules contained in WAC 480-100-405, -415, -425 and -435 to address revisions to RCW 80.80 regarding greenhouse gas emissions. The Commission previously offered an opportunity to provide comments on a Discussion Draft of proposed revisions to these rules.

PacifiCorp, d.b.a. Pacific Power (PacifiCorp or Company) appreciates the work of Commission staff and other commenters in this proceeding. PacifiCorp also appreciates the opportunity provide additional comments. At this time, the Company has no comments on the proposed revisions to the Commission's greenhouse gas emissions performance standard rule contained in the Notice. PacifiCorp reserves the right to provide further comments in the future if the need arises.

If you have any questions regarding these comments, please contact Cathie Allen, Regulatory Manager, (503) 813-5934.

Sincerely,



Andrea L. Kelly
Vice President, Regulation