

July 25, 2012

***VIA ELECTRONIC FILING***

***AND OVERNIGHT DELIVERY***

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: Docket No. U-121165 – Statement of Fact and Law**

**Petition of Puget Sound Energy, Inc. For a Declaratory Order on the Meaning of Conservation in Chapter 19.285 RCW**

Dear Mr. Danner:

PacifiCorp d.b.a. Pacific Power & Light Company (PacifiCorp or Company) submits the attached Statement of Fact and Law in accordance with the Washington Utilities and Transportation Commission’s Notice of Receipt of Petition for Declaratory Order and Opportunity to Submit Statements of Fact and Law issued in Docket U-121165 on July 12, 2012.

If you have any questions regarding the Company’s statement, please contact Carla Bird at (503) 813-5269.

Sincerely,

William R. Griffith

Vice President, Regulation

Enclosures