

May 9, 2008

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

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive, SW
Olympia, WA 98504-7250

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COMMISSION MANAGER
2008 MAY -9 AM 9:51
OFFICE OF THE
ATTORNEY GENERAL
COMMISSION

**Re: Commitment Compliance Filing pursuant to Commitment Wa28 Docket
No. UE-051090**

Dear Ms. Washburn:

PacifiCorp, d.b.a. Pacific Power (“Pacific Power” or “Company”) submits for filing an original and two (2) copies of this commitment filing made in the above-referenced docket.

With this filing, Pacific Power submits its annual momentary average interruption frequency index (“MAIFI”) and momentary average interruption frequency event index (MAIFI_e) results pursuant to the Company’s reporting plan filed on May 1, 2006 in Docket No. UE-051090.

As part of MidAmerican Energy Holdings Company’s (“MEHC”) acquisition of PacifiCorp, the Washington Utilities and Transportation Commission (“Commission”) approved Commitment Wa28 in Order No. 07, Docket UE-051090 which provides in relevant part:

PacifiCorp will file with the Commission a proposed plan to develop and implement an acceptable alternative to the former Network Performance Standard relating to Momentary Average Interruption Frequency Index (“MAIFI”). PacifiCorp commits to implement this measurement plan and provide the results of these calculations to Commission Staff and other interested parties consistent with the terms of the plan.

Status

On May 1, 2006, the Company filed its MAIFI Plan, which indicated that the Company would prepare an annual assessment of its state momentary indices and provide this information to the Commission on an annual basis. As part of the MEHC acquisition, the Company has modified its reporting periods to be calendar-based, and thus is reporting for the calendar 2007 period. The Company provided to the Commission the calculations

for MAIFI and (MAIFI_e) on September 25, 2007 for the shortened-year period April 1, 2006 through December 31, 2006. Consistent with the calculations identified in its MAIFI plan, the Company in this filing provides calculations for the 2007 period January 1, 2007 through December 31, 2007. The momentary MAIFI_e for this period was 3.39 interruption events and 3.55 MAIFI interruptions.

Timing

The Company will provide this data annually on a calendar year basis going forward and will continue to incorporate the material into its regular reliability discussions with the Commission Staff. The data will continue to be provided as soon as practicable after it becomes available.

Communications Regarding this Filing

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

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

Please direct any informal questions to Paul Wrigley, Regulatory Director, at (503) 813-6048.

Sincerely,



Andrea L. Kelly
Vice President, Regulation

cc: Graciela Etchart