

September 16, 2016

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-1166

Attn: Filing Center

Re: Docket UM 1751—PacifiCorp's Comments

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) appreciates the opportunity to provide comments in response to the Public Utility Commission of Oregon's (Commission) Order No. 16-316 seeking comments on draft guidelines issued on August 19, 2016, in this proceeding. The Company provides the following general comments to the draft guidelines in Section C, Storage Potential Evaluation Requirements.

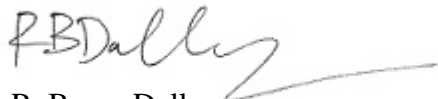
PacifiCorp Comments on Section C, Storage Potential Evaluation Requirements

1. The Company looks forward to participating in the proposed Staff-led workshops to develop the framework for the electric companies' potential evaluations and agrees with the four-part process offered in the draft guidelines.
2. Regarding Section C, item 1a, the Company suggests including the United States Department of Energy 2015 Electric Storage Handbook in item 1a.
3. Regarding Section C, item 2, the Company proposes that the Staff-led workshops address the clarification of the term "potential" and how "potential" can be calculated or otherwise quantified in terms of identifying short- and long-term values.

The Company appreciates the opportunity to provide these comments and looks forward to actively participating throughout this guideline implementation process.

If you have any questions about these comments, please contact Natasha Siores at (503) 813-6583.

Sincerely,



R. Bryce Dalley
Vice President, Regulation