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October 25, 2010

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

Oregon Public Utility Commission
550 Capitol Street NE, Suite 215
Salem, OR 97301-2551

Attn: Filing Center

RE: UM 918 - Pacific Power Response to Staff's Motion to Amend Order No. 98-191

Enclosed for filing by PacifiCorp d.b.a. Pacific Power is an original and one copy of Pacific Power's Response to Staff's Motion to Amend Order No. 98-191 in the above-reference proceeding.

Informal inquiries may be directed to Joelle Steward at (503) 813-5542.

Very truly yours,

Andrea L. Kelly
Vice President, Regulation

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I served a true and correct copy of the foregoing document on the date indicated below by email and/or US Mail, addressed to said parties at his or her last-known address(es) indicated below.

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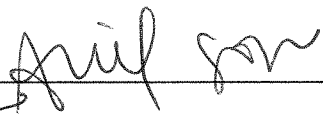
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DATED: October 25, 2010



Ariel Son
Coordinator, Regulatory Operations

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 918

In the Matter of:
The Application Of SCOTTISHPOWER
PLC And PACIFICORP For An Order
Authorizing Scottishpower PLC To Exercise
Substantial Influence Over The Policies And
Actions Of PacifiCorp

**PACIFIC POWER’S RESPONSE TO
STAFF’S MOTION TO AMEND
ORDER NO. 98-191**

1 Pursuant to OAR 860-013-0050(3)(d), PacifiCorp, d/b/a Pacific Power (Pacific
2 Power), respectfully provides this response to the Motion to Amend Order No. 98-191 (UM
3 918) (Staff’s Motion) filed by the Staff of the Public Utility Commission of Oregon (Staff) in
4 the above-captioned proceeding on October 8, 2010.

5 **I. Background and Introduction**

6 Staff’s Motion requests that the Public Utility Commission of Oregon (Commission)
7 issue an order amending Order 98-191 (UM 918) to approve revisions to the previously-
8 approved “Service Quality Measures” agreement (SQM Agreement) regarding provision of
9 service by Pacific Power. During more than the past year, Pacific Power has been working
10 with Staff to modify the SQM and supports Staff’s Motion subject to the condition and
11 clarification provided below.

12 **II. Response**

13 **A. Pacific Power Supports Staff’s Motion Provided Staff and Pacific Power**
14 **Enter into a Policy Agreement Clarifying the Compliance Criteria.**

15 Pacific Power is in support of Staff’s Motion to modify the SQM Agreement
16 provided a policy agreement is developed to ensure clarity of the criteria utilized to
17 determine whether a “major safety violation” (MSV) has occurred; these measures are
18 outlined as “Compliance Thresholds” in the proposed order. Although the SQM Agreement,

1 as modified by Staff's Motion, includes a definition of the compliance thresholds and the
2 MSV, the definitions and calculations are broad and do not include specific criteria or
3 examples upon which to base evaluations of compliance. Pacific Power feels strongly that a
4 policy agreement setting forth such criteria and examples would assist Staff in determining
5 adherence to various measures and to establish whether a MSV has occurred. Further, this
6 clarity would be beneficial in Pacific Power's tailoring of its quality assurance program,
7 while also aiding Pacific Power in the avoidance of an MSV.

8 Staff has also indicated that it would be amenable to working with Pacific Power to
9 negotiate and establish a policy agreement by April 1, 2011.

10 **B. Modifications to the SQM Agreement Would Not Be Effective Until 2011.**

11 Staff's Motion requests that the Commission issue its order amending Order 98-191
12 (UM 918) not later than December 1, 2010 to allow Pacific Power to make changes
13 necessary to comply with the revised SQM Agreement beginning in 2011. Pacific Power
14 would like to further clarify that the proposed revisions to the SQM Agreement are
15 prospective and as such, are applicable commencing with the first annual audit report
16 following completion of the 2011 operating bases audit.

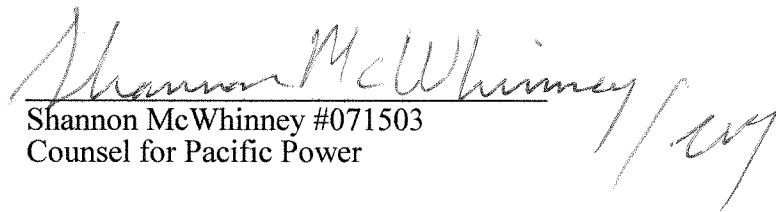
17 **III. Conclusion**

18 Pacific Power supports the SQM revisions set forth in Staff's Motion: (i) provided
19 that a policy agreement clarifying certain compliance criteria is established by April 1, 2011;
20 and (ii) with the clarification that the proposed revisions are prospective.

21 WHEREFORE, subject to the condition and clarification stated above, Pacific Power
22 respectfully requests that the Commission grant Staff's Motion.

DATED: October 25, 2010.

Respectfully submitted,


Shannon McWhinney #071503
Counsel for Pacific Power