



September 21, 2006

**VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY**

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

Attention: Vikie Bailey-Goggins, Administrator

RE: **Compliance Filing – Commitment O-25**  
**Docket No. UM 1209**

Please find enclosed for filing PacifiCorp's Status Report on Achieving the 400 MW Target of New Renewable Resources provided in compliance with Commitment O-25, pursuant to the Oregon Public Utility Commission Order No. 06-121 granting approval of the acquisition of PacifiCorp by MidAmerican Energy Holdings Company, issued March 14, 2006, in the referenced proceeding.

The Commission approved the acquisition of PacifiCorp by MEHC, subject to a Consolidated List of Commitments specified in a settlement agreement supported by all parties to the proceeding. Included in this consolidated list is MEHC's and PacifiCorp's commitment regarding the filing of the enclosed report. Specifically, Commitment O-25 provides that:

O-25) To the extent possible, MEHC and PacifiCorp commit to have 400 MW of cost effective new renewable resources in PacifiCorp's generation portfolio by December 31, 2007. The 400 MW will include Wolverine Creek (64.5 MW) and Cove Fort (42 MW). MEHC and PacifiCorp will analyze the projects consistent with applicable regulatory rules and orders in effect at the time and as informed by the IRP. Resource identification shall be performed using an RFP procedure. If PacifiCorp fails to meet this 400 MW target it will disclose to signatories (excluding any bidders and affiliates of bidders) the cost-effectiveness analysis it used when rejecting the lowest cost projects. PacifiCorp shall file a report, on the status of meeting this target, with the Commission. In evaluating acquisition of renewable energy, all other things being equal, MEHC and PacifiCorp will not prefer ownership of facilities.

By copy of this letter, other parties to the proceeding are being provided notice of 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](mailto:datarequest@pacificorp.com)

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

If you have informal inquiries or would like to request a copy of the filing, please contact Laura Beane, Regulatory Manager, at (503) 813-5542.

Sincerely,



Natalie Hocken

Assistant General Counsel

Enclosure

cc: Service List UM 1209 (w/o enc.)

### “400 MW by 2007” Status Report

In the course of seeking regulatory approvals for the acquisition of PacifiCorp by MidAmerican Energy Holdings Company (“MEHC”), MEHC and PacifiCorp made a commitment regarding the acquisition of 400 MW of cost effective renewable resources by December 31, 2007 and PacifiCorp agreed to provide a status report on its progress toward satisfying this commitment. Specifically, the commitment provides:

To the extent available, MEHC and PacifiCorp commit to have 400 MW of cost effective new renewable resources in PacifiCorp’s generation portfolio by December 31, 2007. The 400 MW will include Wolverine Creek (64.5 MW) and Cove Fort (42 MW). MEHC and PacifiCorp will analyze the projects consistent with applicable regulatory rules and orders in effect at the time and as informed by the IRP. Resource identification shall be performed using an RFP procedure. If PacifiCorp fails to meet this 400 MW target it will disclose to signatories (excluding bidders and affiliates of bidders) the cost-effectiveness analysis it used when rejecting the lowest cost projects. PacifiCorp shall file a report, on the status of meeting this target, with the Commission no later than six months after close of the transaction. In evaluating acquisition of renewable energy, all other things being equal, MEHC and PacifiCorp will not prefer ownership of facilities.

See Commitment O25.

PacifiCorp has made the following progress toward the “400 MW by 2007” objective:

Resource	Status	Amount	Type	Comments
Wolverine Creek	Commercial	64.5 MW	Wind	20-year PPA
Upgrade 1	Construction	11.0 MW	Geothermal	Own/operate
Leaning Juniper 1	Commercial	100.5 MW	Wind	Own/operate
PPA 1	Commercial	20.0 MW	Biomass	5-yr PPA starting 8/1/2006
Subtotal to date		<b>196.0 MW</b>		

The Company is currently in negotiations for the remainder of the new renewable resources.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of June, 2006, I caused to be served, via Email(if address available) or U.S. mail, a true and correct copy of the Cover Letter for PacifiCorp's Compliance Filing (Commitment O25) in Docket UM 1209.

<p>RATES &amp; REGULATORY AFFAIRS PORTLAND GENERAL ELECTRIC RATES &amp; REGULATORY AFFAIRS 121 SW SALMON STREET, 1WTC0702 PORTLAND OR 97204 <a href="mailto:pge.opuc.filings@pgn.com">pge.opuc.filings@pgn.com</a></p>	<p>NW ENERGY COALITION 219 FIRST ST STE 100 SEATTLE WA 98104</p>
<p>UTILITY WORKERS UNION OF AMERICA PO BOX 37 SAN CLEMENTE CA 92674-0037 <a href="mailto:uwua@redhabanero.com">uwua@redhabanero.com</a></p>	<p>THANE SOMERVILLE – CONFIDENTIAL MORISSET, SCHLOSSER, JOZWAIK &amp; MCGAW 801 SECOND AVE – STE 1115 SEATTLE WA 98104-1509 <a href="mailto:t.somerville@msaj.com">t.somerville@msaj.com</a></p>
<p>DOUGLAS L ANDERSON MIDAMERICAN ENERGY HOLDINGS CO 302 S 36 ST STE 400 OMAHA NE 68131 <a href="mailto:danderson@midamerican.com">danderson@midamerican.com</a></p>	<p>JIM ABRAHAMSON -- CONFIDENTIAL COMMUNITY ACTION DIRECTORS OF OREGON PO BOX 7964 SALEM OR 97303-0208 <a href="mailto:jim@cado-oregon.org">jim@cado-oregon.org</a></p>
<p>ADAM S ARMS MCKANNA BISHOP JOFFE &amp; SULLIVAN LLP 1635 NW JOHNSON ST PORTLAND OR 97209 <a href="mailto:aarms@mbjlaw.com">aarms@mbjlaw.com</a></p>	<p>SUSAN ANDERSON CITY OF PORTLAND OFFICE OF SUSTAINABLE DEV 721 NW 9TH AVE -- SUITE 350 PORTLAND OR 97209-3447 <a href="mailto:susananderson@ci.portland.or.us">susananderson@ci.portland.or.us</a></p>

<p>MAGGIE BRILZ  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707-0070  <a href="mailto:mbrilz@idahopower.com">mbrilz@idahopower.com</a></p>	<p>CURTIS G BERKEY  ALEXANDER, BERKEY, WILLIAMS &amp;  WEATHERS, LLP  2030 ADDISON STREET, SUITE 410  BERKELEY CA 94704  <a href="mailto:cberkey@abwwlaw.com">cberkey@abwwlaw.com</a></p>
<p>JOANNE M BUTLER  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707-0070  <a href="mailto:jbutler@idahopower.com">jbutler@idahopower.com</a></p>	<p>LOWREY R BROWN -- CONFIDENTIAL  CITIZENS' UTILITY BOARD OF  OREGON  610 SW BROADWAY, SUITE 308  PORTLAND OR 97205  <a href="mailto:lowrey@oregoncub.org">lowrey@oregoncub.org</a></p>
<p>RALPH CAVANAGH --  CONFIDENTIAL  NATURAL RESOURCES DEFENSE  COUNCIL  111 SUTTER ST FL 20  SAN FRANCISCO CA 94104  <a href="mailto:rcavanagh@nrdc.org">rcavanagh@nrdc.org</a></p>	<p>PHIL CARVER  OREGON DEPARTMENT OF ENERGY  625 MARION ST NE STE 1  SALEM OR 97301-3742  <a href="mailto:philip.h.carver@state.or.us">philip.h.carver@state.or.us</a></p>
<p>JOHN CORBETT  YUOK TRIBE  PO BOX 1027  KLAMATH CA 95548  <a href="mailto:jcorbett@yuroktribe.nsn.us">jcorbett@yuroktribe.nsn.us</a></p>	<p>BRYAN CONWAY  PO BOX 2148  SALEM OR 97309-2148  <a href="mailto:bryan.conway@state.or.us">bryan.conway@state.or.us</a></p>
<p>CHRIS CREAN  MULTNOMAH COUNTY  501 SE HAWTHORNE, SUITE 500  PORTLAND OR 97214  <a href="mailto:christopher.d.crean@co.multnomah.or.us">christopher.d.crean@co.multnomah.or.us</a></p>	<p>JOAN COTE -- CONFIDENTIAL  OREGON ENERGY COORDINATORS  ASSOCIATION  2585 STATE ST NE  SALEM OR 97301  <a href="mailto:cotej@mwvcaa.org">cotej@mwvcaa.org</a></p>
<p>MICHAEL EARLY  INDUSTRIAL CUSTOMERS OF  NORTHWEST UTILITIES  333 SW TAYLOR STE 400  PORTLAND OR 97204  <a href="mailto:mearly@icnu.org">mearly@icnu.org</a></p>	<p>MELINDA J DAVISON  DAVISON VAN CLEVE PC  333 SW TAYLOR, STE. 400  PORTLAND OR 97204  <a href="mailto:mail@dvclaw.com">mail@dvclaw.com</a></p>

<p>ANN L FISHER  AF LEGAL &amp; CONSULTING  SERVICES  2005 SW 71ST AVE  PORTLAND OR 97225-3705  <a href="mailto:energlaw@aol.com">energlaw@aol.com</a></p>	<p>JASON EISDORFER -- CONFIDENTIAL  CITIZENS' UTILITY BOARD OF  OREGON  610 SW BROADWAY STE 308  PORTLAND OR 97205  <a href="mailto:jason@oregoncub.org">jason@oregoncub.org</a></p>
<p>BERNARDO R GARCIA  UTILITY WORKERS UNION OF  AMERICA  215 AVENDIA DEL MAR, SUITE M  SAN CLEMENTE CA 92672  <a href="mailto:uwua@redhabanero.com">uwua@redhabanero.com</a></p>	<p>JOHN R GALE  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707-0070  <a href="mailto:rgale@idahopower.com">rgale@idahopower.com</a></p>
<p>DAVID E HAMILTON  NORRIS &amp; STEVENS  621 SW MORRISON ST STE 800  PORTLAND OR 97205-3825  <a href="mailto:davidh@norrstev.com">davidh@norrstev.com</a></p>	<p>ANN ENGLISH GRAVATT  RENEWABLE NORTHWEST PROJECT  917 SW OAK - STE 303  PORTLAND OR 97205  <a href="mailto:ann@rnp.org">ann@rnp.org</a></p>
<p>JASON W JONES -- CONFIDENTIAL  DEPARTMENT OF JUSTICE  REGULATED UTILITY &amp; BUSINESS  SECTION  1162 COURT ST NE  SALEM OR 97301-4096  <a href="mailto:jason.w.jones@state.or.us">jason.w.jones@state.or.us</a></p>	<p>NANCY HARPER  IBEW, LOCAL 125  17200 NE SACRAMENTO  GRESHAM OR 97230  <a href="mailto:nancy@ibew125.com">nancy@ibew125.com</a></p>
<p>BARTON L KLINE --  CONFIDENTIAL  IDAHO POWER COMPANY  PO BOX 70  BOISE ID 83707-0070  <a href="mailto:bkline@idahopower.com">bkline@idahopower.com</a></p>	<p>ANDREA L KELLY  PACIFICORP  825 NE MULTNOMAH ST STE 2000  PORTLAND OR 97232  <a href="mailto:andrea.kelly@pacificorp.com">andrea.kelly@pacificorp.com</a></p>

<p>MICHAEL T WEIRICH -- CONFIDENTIAL DEPARTMENT OF JUSTICE REGULATED UTILITY &amp; BUSINESS SECTION 1162 COURT ST NE SALEM OR 97301-4096 <a href="mailto:michael.weirich@state.or.us">michael.weirich@state.or.us</a></p>	<p>KAITLIN LOVELL TROUT UNLIMITED 213 SW ASH ST, SUITE 205 PORTLAND OR 97204 <a href="mailto:klovell@tu.org">klovell@tu.org</a></p>
<p>STEVEN WEISS NORTHWEST ENERGY COALITION 4422 OREGON TRAIL CT NE SALEM OR 97305 <a href="mailto:steve@nwenergy.org">steve@nwenergy.org</a></p>	<p>WILLIAM MILLER IBEW, LOCAL 125 17200 NE SACRAMENTO GRESHAM OR 97230 <a href="mailto:bill@ibew125.com">bill@ibew125.com</a></p>
<p>MICHAEL W ORCUTT HOOPA VALLEY TRIBE FISHERIES DEPT PO BOX 417 HOOPA CA 95546</p>	<p>BARBARA LEE NORMAN KARUK TRIBE OF CALIFORNIA PO BOX 657 YREKA OR 96097</p>
<p>LISA F RACKNER -- CONFIDENTIAL ATER WYNNE LLP 222 SW COLUMBIA ST STE 1800 PORTLAND OR 97201-6618 <a href="mailto:lfr@aterwynne.com">lfr@aterwynne.com</a></p>	<p>JANET L PREWITT -- CONFIDENTIAL DEPARTMENT OF JUSTICE 1162 COURT ST NE SALEM OR 97301-4096 <a href="mailto:janet.prewitt@doj.state.or.us">janet.prewitt@doj.state.or.us</a></p>
<p>GREGORY W SAID IDAHO POWER COMPANY PO BOX 70 BOISE ID 83707 <a href="mailto:gsaid@idahopower.com">gsaid@idahopower.com</a></p>	<p>STEVE ROTHERT AMERICAN RIVERS 409 SPRING ST, SUITE D NEVADA CITY CA 95959 <a href="mailto:srothert@americanrivers.org">srothert@americanrivers.org</a></p>
<p>GLEN H SPAIN -- CONFIDENTIAL PACIFIC COAST FEDERATION OF FISHERMEN'S ASSOC PO BOX 11170 EUGENE OR 97440-3370 <a href="mailto:fish1lfr@aol.com">fish1lfr@aol.com</a></p>	<p>THOMAS P SCHLOSSER MORISSET, SCHLOSSER, JOZWIAK &amp; MCGAW 801 SECOND AVE, SUITE 1115 SEATTLE WA 98104-1509 <a href="mailto:t.schlosser@msaj.com">t.schlosser@msaj.com</a></p>



<p>DOUGLAS C TINGEY  PORTLAND GENERAL ELECTRIC  121 SW SALMON 1WTC13  PORTLAND OR 97204  <a href="mailto:doug.tingey@pgn.com">doug.tingey@pgn.com</a></p>	<p>JOHN W STEPHENS  ESLER STEPHENS &amp; BUCKLEY  888 SW FIFTH AVE STE 700  PORTLAND OR 97204-2021  <a href="mailto:stephens@eslerstephens.com">stephens@eslerstephens.com</a></p>
<p>SANDI R TRIPP  KARUK TRIBE DEPT. OF NATURAL  RESOURCES  PO BOX 1016  HAPPY CAMP CA 95546</p>	<p>BENJAMIN WALTERS  CITY OF PORTLAND - OFFICE OF CITY  ATTORNEY  1221 SW 4TH AVE - RM 430  PORTLAND OR 97204  <a href="mailto:bwalters@ci.portland.or.us">bwalters@ci.portland.or.us</a></p>
<p>JESSICA GORHAM  ATER WYNNE LLP  222 SW COLUMBIA STE 1800  PORTLAND OR 97201  <a href="mailto:jac@aterwynne.com">jac@aterwynne.com</a></p>	<p>DANIEL MEEK  ATTORNEY AT LAW  10949 SW 4<sup>TH</sup> AVE  PORTLAND OR 97219  <a href="mailto:dan@meeek.net">dan@meeek.net</a></p>
<p>MATTHEW W PERKINS --  CONFIDENTIAL  DAVISON VAN CLEVE PC  333 SW TAYLOR, STE. 400  PORTLAND OR 97204  <a href="mailto:mwp@dvclaw.com">mwp@dvclaw.com</a></p>	<p>D KEVIN CARLSON – CONFIDENTIAL  DEPT OF JUSTICE – GENERAL  COUNSEL DIVISION  1162 COURT ST NE  SALEM OR 97301-4096  <a href="mailto:d.carlson@doj.state.or.us">d.carlson@doj.state.or.us</a></p>
<p>LINDA WILLIAMS  KAFOURY &amp; MCDUGAL  ATTORNEY AT LAW  10266 SW LANCASTER RD  PORTLAND OR 97219-6305  <a href="mailto:linda@lindawilliams.net">linda@lindawilliams.net</a></p>	<p>EDWARD BARTELL  KLAMATH OFF-PROJECT WATER  USERS INC  30474 SPRAGUE RIVER ROAD  SPRAGUE RIVER OR 97639</p>
<p>ANDREA FOGUE  SENIOR STAFF ASSOCIATE  LEAGUE OF OREGON CITIES  PO BOX 928  1201 COURT ST NE STE 200  SALEM OR 97308  <a href="mailto:afogue@orcities.org">afogue@orcities.org</a></p>	<p>KATHERINE A MCDOWELL  MCDOWELL &amp; ASSOCIATES PC  520 SW SIXTH AVENUE, SUITE 830  PORTLAND OR 97204  <a href="mailto:katherine@mcd-law.com">katherine@mcd-law.com</a></p>

<p>MARK C MOENCH          SENIOR VICE PRESIDENT – LAW          MIDAMERICAN ENERGY          HOLDINGS COMPANY          201 S MAIN ST – STE 2300          SALT LAKE CITY UT 84111  <a href="mailto:mcmoench@midamerican.com">mcmoench@midamerican.com</a></p>	<p>PAUL R WOODIN          WESTERN WIND POWER          282 LARGENT LANE          GOLDENDALE WA 98620-3519  <a href="mailto:pwoodin@gorge.net">pwoodin@gorge.net</a></p>
<p>ROB ROY SMITH – CONFIDENTIAL          MORISSET, SCHLOSSER, JOZWAIK          &amp; MCGAW          1115 NORTON BUILDING          801 SECOND AVE          SEATTLE WA 98104-1509  <a href="mailto:r.smith@msaj.com">r.smith@msaj.com</a></p>	<p>ROBERT DENHAM          MUNGER, TOLLES &amp; OLSEN, LLP          355 SOUTH GRAND AVE          35<sup>TH</sup> FLOOR          LOS ANGELES CA 90071  <a href="mailto:robert.denham@mtto.com">robert.denham@mtto.com</a></p>
<p>MARK THOMPSON          PUBLIC POWER COUNCIL          1500 NE IRVING ST – STE 200          PORTLAND OR 97232  <a href="mailto:mthompson@ppcpdx.org">mthompson@ppcpdx.org</a></p>	<p>PETER J RICHARDSON          RICHARDSON &amp; O’LEARY          PO BOX 7218          BOISE ID 83707  <a href="mailto:peter@richardsonandoleary.com">peter@richardsonandoleary.com</a></p>
<p>CHARLTON H BONHAM          TROUT UNLIMITED          828 SAN PABLO AVE          SUITE 208          AIBANY CA 94706  <a href="mailto:cbonham@tu.org">cbonham@tu.org</a></p>	<p>BRIAN JOHNSON – CONFIDENTIAL          TROUT UNLIMITED          825 SAN PABLO AVE          SUITE 208          AIBANY CA 94706  <a href="mailto:bjohnson@tu.org">bjohnson@tu.org</a></p>



Peggy Ryan  
 Supervisor Regulatory Administration