

March 13, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

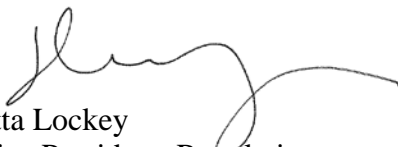
Attn: Filing Center

**RE: UM 2049- PacifiCorp's Renewable Portfolio Standard Implementation Plan
2021 to 2023**

Pursuant to the procedural schedule in docket UM 2049, PacifiCorp d/b/a Pacific Power submits this letter in lieu of reply comments to the Public Utility Commission of Oregon (Commission) regarding its Renewable Portfolio Standard Implementation Plan for 2021 to 2023 filed on December 31, 2019. The Commission waived certain requirements set forth in OAR 860-083-0400(2)-(5) with respect to the Renewable Portfolio Standard Implementation Plan for 2021 to 2023 in order to allow time for the conclusion of pending renewable portfolio standard (RPS) rulemakings that will impact this plan going forward.

On February 14, 2020, Commission Staff filed initial comments regarding the Company's December 31, 2019 filing concluding that PacifiCorp has met all applicable requirements. Commission Staff's comments also identify several issues with RPS compliance and implementation plans but state that these issues are not specific to the Company and are best addressed through the pending RPS rulemakings. The Company does not have any substantive comments in response to Commission staff's initial comments; PacifiCorp appreciates Staff's efforts and looks forward to working with Staff and other stakeholders to resolve the larger issues identified by Staff in the pending rulemakings. The Company agrees that the best forum for resolving these issues is through a rulemaking process and not individual utility proceedings.

Sincerely,


Etta Lockey
Vice President, Regulation

Enclosures

cc: UM 2049 Service List