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April 7, 2011

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

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

Attn: Filing Center

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

PacifiCorp d/b/a Pacific Power (“Company”) encloses for filing its Response to Staff’s Motion to Amend Order No. 98-191 in the above-referenced proceeding. As indicated on the attached service list, a copy of this filing is being served to all parties on the service list.

Please contact Joelle Steward, Regulatory Manager, at (503) 813-5542, for questions on this matter.

Sincerely,

Andrea L. Kelly
Vice President, Regulation

Enclosure

cc: Service List – UM 918

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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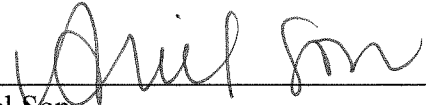
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DATED: April 7, 2011

A handwritten signature in cursive script that reads "Ariel Son". The signature is written in black ink and is positioned above a horizontal line.

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 (UM 918)**

1 Pursuant to OAR 860-013-0050(3)(d), PacifiCorp, d/b/a Pacific Power (Pacific
2 Power), respectfully provides this response to Staff's Motion to Amend Order No. 98-191
3 (UM 918) filed by the Staff of the Public Utility Commission of Oregon (Staff) in the
4 above-captioned proceeding March 23, 2011.

5 **I. Background and Introduction**

6 Staff's Motion requests that the Public Utility Commission of Oregon
7 (Commission) issue an order amending Order 98-191 (UM 918) to approve revisions to
8 the previously-approved "Service Quality Measures" agreement (SQM Agreement)
9 regarding provision of service by Pacific Power. Pacific Power has been working with
10 Staff to modify the SQM and supports Staff's Motion subject to the proposed minor
11 modification set forth below.

12 **II. Response**

13 Pacific Power is in support of Staff's Motion to modify the SQM Agreement;
14 however, Pacific Power proposes that the yearly Maintenance Program Review Meeting
15 be held by June 15 rather than May 1 as May 1 is the same due date for filing the Annual
16 Report and does not allow adequate time for review and scheduling.

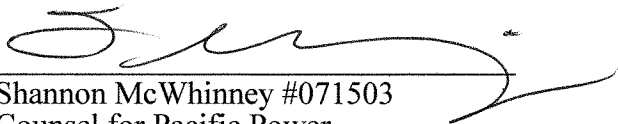
1 **III. Conclusion**

2 Pacific Power supports the SQM revisions set forth in Staff's Motion subject to
3 the minor revision proposed above.

4 WHEREFORE, subject to the revision proposed herein, Pacific Power
5 respectfully requests that the Commission grant Staff's Motion.

DATED: April 7, 2011.

Respectfully submitted,


Shannon McWhinney #071503
Counsel for Pacific Power