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May 21, 2013

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

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

Attn: Filing Center

Re: Docket UM 1610 – Errata Filing

On May 20, 2013, PacifiCorp d/b/a Pacific Power submitted a Pre-hearing Memorandum in docket UM 1610.

The Company has since identified an error on page 14, footnote 79. The Company requests that the enclosed Errata – Pre-hearing Memorandum Page 14 be substituted for the originally-filed Pre-hearing Memorandum Page 14.

Please contact Joelle Steward, Director of Pricing, Cost of Service and Regulatory Operations, at (503) 813-5542 for questions on this matter.

Sincerely,

William R. Griffith
Vice President, Regulation

Enclosures

Cc: Service List - UM 1610

ERRATA – PRE-HEARING MEMORANDUM PAGE 14

exchanged critically important commercial, safety, and resource planning information.⁷⁷

Establishing the LEO when the QF approves the final draft contract is also reasonable in the context of specific requirements and timelines contained in Schedule 37, which restrict PacifiCorp's ability to frustrate the establishment of an LEO through extended negotiations.⁷⁸

6E. How should contracts address mechanical availability?

PacifiCorp currently uses an output guarantee, rather than a mechanical availability guarantee (MAG) for all QF resources except wind QFs and QFs delivering power on a non-firm basis.⁷⁹ There is currently no industry standard MAG for wind projects, although it is widely believed that the North American Electric Reliability Corporation will require owners of wind project to report outage data in the future.⁸⁰ PacifiCorp recommends increasing the MAG in its standard QF contracts. Specifically, for new wind QF contracts, the Guaranteed Availability should be increased from 0.875 to 0.90 for contract year three and all remaining contract years for the term of the contract. For existing QF projects that are renewing a contract or have previously had a contract with another utility, the Guaranteed Availability should be set at 0.90 starting in contract year one. In PacifiCorp's experience, wind QFs have consistently demonstrated an ability to meet these levels of Guaranteed Availability after excluding hours lost to force majeure and scheduled maintenance.⁸¹

In addition, PacifiCorp's current definition for availability in its standard QF contract allows 240 hours per year per wind turbine for scheduled wind turbine maintenance. PacifiCorp proposes reducing this to 60 hours per wind turbine. PacifiCorp's recent experience demonstrates that this change is reasonable.⁸²

⁷⁷ *Id.* at 29.

⁷⁸ *Id.* at 28.

⁷⁹ PAC/203, Griswold/2. PacifiCorp would prefer an output guarantee over a MAG even for wind QFs, but PacifiCorp has found that wind QFs are unwilling or unable to provide an output guarantee and will only provide a MAG. *Id.* at 3.

⁸⁰ *Id.* at 3-4.

⁸¹ *Id.* at 4.

⁸² *Id.* at 5.

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Errata Filing in the Investigation into Qualifying Facility Contracting and Pricing on the parties listed below via electronic mail and/or US mail in compliance with OAR 860-001-0180.

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Dated this 21st day of May 2013.


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