

December 18, 2013

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

Public Utility Commission of Oregon  
3930 Fairview Industrial Dr. S.E.  
Salem, OR 97302-1166

Attn: Filing Center

**Re: Docket AR 555—PacifiCorp’s Final Comments**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) appreciates the opportunity to provide comments regarding proposed changes to the portfolio options and labeling rules under OAR 860-038-0005 and 860-038-0300.

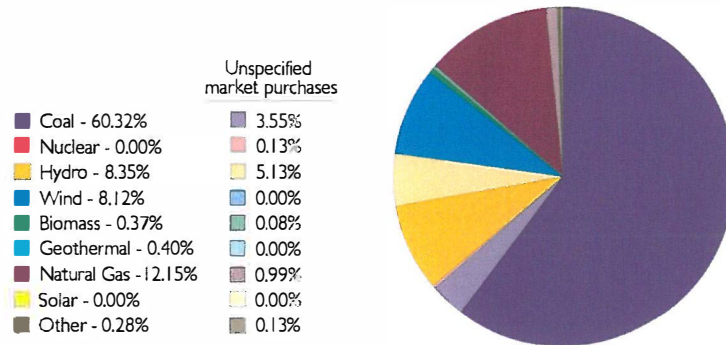
**A. Frequency of Communication to Customers**

In its December 9, 2013 comments, Portland General Electric Company (PGE) expressed its concern that eliminating specific timing and frequency requirements in OAR 860-038-0300(2) may create uncertainty. To address this potential uncertainty, PGE proposed that the rule changes become effective concurrent with the follow-up order from the Public Utility Commission of Oregon (Commission) setting forth the specific timing and frequency requirements. As discussed at the rulemaking hearing on December 11, 2013, PacifiCorp is supportive of PGE’s proposal.

**B. Power Source Mix Chart Format**

PacifiCorp supports eliminating language in the final template that requires utilities to present the power source mix information in a “pie” chart. As agreed to in the 2012 workshops, the Company supports the use of a single chart that would separate the reporting of owned resources and specified purchases from unspecified market purchases. Participants in the workshops agreed that unspecified market purchases may be identified by shading a portion of each resource type within the pie chart.

However, in the process of designing the Company’s new customer label insert, the Company found the pie chart format to be difficult to read in depicting small percentages. (See example below.)



*Pacific Power may save the renewable energy credits associated with the eligible renewable energy (wind, biomass and some hydro) in our Basic Service resource mix to comply with Oregon's Renewable Portfolio Standard beginning in 2011. For more information, visit [pacificpower.net/ORrps](http://pacificpower.net/ORrps).*

The Company proposes that the final template allow flexibility for utilities to choose a different chart format that would best depict the power source mix and optimize clarity. The Company also supports Staff's proposal to allow the portfolio options committee to evaluate the alternate chart formats for recommendation to the Commission.

Please contact Bryce Dalley at (503) 813-6389 if you have any questions.

Sincerely,

*William R. Griffith/AS*  
William R. Griffith  
Vice President, Regulation

## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Comments 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 18<sup>th</sup> day of December 2013.

  
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