

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • tcp@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

March 5, 2018

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem, OR 97301

Re: In the Matter of PACIFICORP, dba PACIFIC POWER
2019-2023 Renewable Portfolio Standard Implementation Plan
Docket No. UM 1914

Dear Filing Center:

Pursuant to the Oregon Public Utilities Commission's ("Commission") February 15, 2018, order, the Industrial Customers of Northwest Utilities ("ICNU") files these Comments on PacifiCorp's Renewable Portfolio Standard Implementation Plan ("RPIP") for the compliance years 2019-2023. In PacifiCorp's previous RPIP, ICNU identified a number of concerns it had with how the Company was calculating its incremental cost of compliance.^{1/} These issues remain outstanding and ICNU maintains its position on them. Rather than repeat these concerns, however, ICNU expects to pursue them in the Commission's RPS rulemaking docket, AR 610.

If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Tyler C. Pepple
Tyler C. Pepple

^{1/} See ICNU Comments in Docket Nos. UM 1754 and UM 1790.