825 NE Multnomah, Suite 2000 Portland, Oregon 97232



February 1, 2013

## VIA ELECTRONIC FILING AND OVERNIGHT DELIVERY

Public Utility Commission of Oregon 550 Capitol Street NE, Suite 215 Salem, OR 97310-2551

Attn: Filing Center

## Re: UM 1182 – PacifiCorp's Prehearing Brief – Errata Page

PacifiCorp d/b/a Pacific Power submits for filing an original and five copies of the errata page to the Prehearing Brief in the above-referenced proceeding.

Please direct informal correspondence and questions regarding this filing to Bryce Dalley, Director, Regulatory Affairs & Revenue Requirement, at (503) 813-6389.

Sincerely,

Vir K- Gfft / PBD

William R. Griffith Vice President, Regulation

Enclosures

cc: UM 1182 Service List

work with Staff or another independent third-party expert, to develop criteria to address the risks to utility customers for each issue identified in this docket.

In addition, the Company has proposed a number of recommendations in its testimony for four of the twelve comparative risks, including instances where the assessment of relevant contract terms will be critical to ensure third-party bidders' contract provisions will mirror the protections that were a part of the assessed bid. The Company also proposes certain non-negotiable contract terms. By adopting such terms, the Commission would insert some regulatory and risk mitigation certainty into the existing completely bilateral contract negotiations.

The Company recommends that NIPPC's proposed pre-determined generic bid adjustments to be applied asymmetrically to benchmark resources be rejected. Rather, the Company recommends that the Commission direct the parties to focus this docket on its original intent—not to remedy any perceived or alleged, yet undemonstrated, bias—to develop a more comprehensive accounting and comparison of all of the relevant risks, including consideration of construction risks, operation and performance risks, and environmental regulatory risks between benchmark resources and IPPs.

Dated: February 1, 2013

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Mary Wiencke Senior Counsel PacifiCorp 825 NE Multnomah Street, Suite 1800 Portland, OR 97232