

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 246

In the Matter of

PACIFICORP, dba PACIFIC POWER,

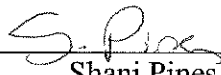
Request for a General Rate Revision

**BRIEFING
MEMORANDUM**

Parties' briefs are due on November 7, 2012. In its brief, the Commissioners request that PacifiCorp, dba Pacific Power, address the following questions (other parties may also address the questions as relevant to their positions). Parties should cite only to evidence contained in the record.

1. Did participation in the SO₂ Backstop Trading Program in Wyoming and Utah trigger any legally enforceable emissions limits or unit-specific pollution controls applicable to PacifiCorp's plants or units? What documents in the record identify the source and effective date of the required emissions limits or pollution controls? What plant-specific emissions limits applied to Pacific Power for the years 2006-2009? If the plant-specific emissions limits were exceeded, on what date would PacifiCorp be penalized for the exceedance? On what date would PacifiCorp have to demonstrate compliance with any requirements resulting from the exceedance?
2. Other than its PVR(d) analysis, did Pacific Power consider any other compliance alternatives to installing the emissions controls at its BART-specific units? What evidence in the record demonstrates the company's consideration of compliance alternatives such as finding an alternative generating source to meet customers' needs?

Dated this 1st day of November, 2012, at Salem, Oregon.



Shani Pines
Administrative Law Judge