July 6, 2012

***VIA ELECTRONIC MAIL***

Clerk of the Board

California Air Resources Board

1001 I Street

Sacramento, California 95814

**Re: Comments of PacifiCorp Regarding the California Air Resources Board (ARB) Second Proposed 15 Day Modifications to the Assembly Bill 32 Cost of Implementation Fee Regulation**

Dear Clerk of the Board:

PacifiCorp is a regulated multi-jurisdictional retail provider (MJRP) serving 1.7 million retail electricity customers, in Utah, Oregon, Wyoming, Washington, Idaho and California. The company operates two balancing authority areas. PacifiCorp owns, or has interests in, 75 thermal, hydroelectric, wind-powered and geothermal generating facilities, with a net owned capacity of 10,597 megawatts. PacifiCorp owns, or has interest in, electric transmission and distribution assets, and transmits electricity through approximately 16,200 miles of transmission lines and 62,800 miles of distribution lines. PacifiCorp also buys and sells electricity on the wholesale market with public and private utilities, energy marketing companies and incorporated municipalities as a result of excess electricity generation or other system balancing activities. In California, PacifiCorp serves approximately 45,000 customers in Del Norte, Modoc, Shasta and Siskiyou counties.

PacifiCorp appreciates the opportunity to provide comment to the proposed modifications to the AB 32 Cost of Implementation Fee Regulation. PacifiCorp has worked closely with ARB staff and would like to commend them for their hard work and professionalism.

**PacifiCorp supports ARB’s removal of Section 95203 (j), relating to Electricity Fee Rate calculation for Multijurisdictional Retail Providers.**

PacifiCorp agrees with ARB that Section 95203 (j) should be removed to maintain consistency with the Mandatory Reporting Regulation. Further, PacifiCorp agrees that the fee rate for MJRP’s wholesale deliveries into California (not for retail use) should be calculated using Section 95203 (f), which again is consistent with the Mandatory Reporting Regulation. Since the Mandatory Reporting Regulation identifies MJRP wholesale sales to a first point of delivery into California as an unspecified delivery, the AB 32 Cost of Implementation Fee should reflect that same qualification.

Thank you for your consideration of these comments.

Dated: July 6, 2012 Respectfully submitted,

By



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