

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of PACIFICORP
(U 901 E), an Oregon Company, for approval to
implement a solar incentive program.

Application No. 10-03-002
(Filed March 1, 2010)

REPLY OF PACIFICORP (U-901-E)

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Date: April 12, 2010

Attorney for PacifiCorp

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Pursuant to Rule 2.6 of the California Public Utilities Commission's ("Commission") Rules of Practice and Procedure ("Rules"), PacifiCorp, d.b.a. Pacific Power ("PacifiCorp" or "Company"), respectfully submits this reply to the Response of the Division of Ratepayer Advocates ("DRA") to PacifiCorp's Application for Approval to Implement a Solar Incentive Program ("Application").

I. DISCUSSION

California has made the development of renewable energy resources, and specifically solar generation and customer-owned distributed generation, an important policy priority. In furtherance of this policy, PacifiCorp's Application proposes a solar incentive program to provide rebate payments to its California customers who install solar photovoltaic systems on their premises. PacifiCorp appreciates DRA's preliminary support for the Application expressed in its Response filed April 2, 2010.

Many of the suggestions offered by DRA will be addressed during the development of the program. PacifiCorp has contracted with the California Center for Sustainable Energy

(“CCSE”) to administer the program. CCSE is in the process of developing a detailed program handbook as DRA recommends. Lessons learned by CCSE in developing and implementing the California Solar Initiative (“CSI”) program can be incorporated to improve PacifiCorp’s proposed program. In addition, PacifiCorp agrees with DRA that it is important to note that the unique aspects of PacifiCorp’s service territory and the small size of the program may justify some differences between this new program and CSI. PacifiCorp also agrees with DRA that energy efficiency measures may be more thoroughly incorporated into the program and looks to the Commission for guidance in this area.

PacifiCorp intends to develop the proposed program through an open public process, consistent with DRA’s recommendation. In this context, PacifiCorp respectfully requests that any public process be completed expeditiously to ensure that PacifiCorp’s customers may benefit from participation in the program to the greatest extent possible. The Company has requested a program effective date of August 2, 2010, which will allow for installations to occur in 2010. A delay would effectively foreclose activity until spring of 2011 in much of PacifiCorp’s California service territory.

II. CONCLUSION

PacifiCorp appreciates the preliminary support offered by DRA. Based on the foregoing, PacifiCorp respectfully requests that the Commission approve the Application in a timely manner.

Respectfully submitted this April 12, 2010, at San Francisco, California.

By Jordan A. White / MT
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Certificate of Service

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have provided via electronic mail or US Mail if an E-mail address has not been provided, a true and correct copy of the **PacifiCorp's (U 901-E) Reply Comments** to the following parties:

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A.10-03-002**

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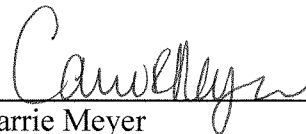
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DATED: April 12, 2010, at Portland, Oregon



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