

**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) TO JOINT RESPONSE OF COLLEGE OF THE  
SISKIYOU, DUNSMUIR COMMUNITY GARDENS, INC. AND JEFFERSON  
ECONOMIC DEVELOPMENT INSTITUTE TO PACIFICORP'S SUPPLEMENT TO  
APPLICATION FOR APPROVAL TO IMPLEMENT A SOLAR INCENTIVE  
PROGRAM, RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO  
PACIFICORP'S SUPPLEMENT TO APPLICATION, AND PACIFICORP'S REPLY TO  
THE RESPONSE OF THE DIVISION OF RATEPAYER ADVOCATES TO  
PACIFICORP'S SUPPLEMENT TO APPLICATION**

Jordan A. White  
PacifiCorp  
1407 W North Temple, Suite 320  
Salt Lake City, UT 84116  
Telephone: (801) 220-2279  
Facsimile: (801) 220-4615  
Email: [Jordan.White@pacificorp.com](mailto:Jordan.White@pacificorp.com)

Date: September 15, 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, *Administrative Law Judge's Ruling Granting Motion for Party Status to Siskiyou Parties*, dated September 14, 2010, and approval provided by Administrative Law Judge Duda by email dated September 8, 2010 at 3:34 p.m., PacifiCorp, d.b.a. Pacific Power (PacifiCorp or Company), respectfully submits this Reply to the Joint Response of College of the Siskiyou, Dunsmuir Community Gardens, Inc. and Jefferson Economic Development Institute to PacifiCorp's Supplement to Application for Approval to Implement a Solar Incentive Program, Response of the Division of Ratepayer Advocates To PacifiCorp's Supplement to Application, and PacifiCorp's Reply to the Response Of the Division Of Ratepayer Advocates To PacifiCorp's Supplement to Application (Joint Response). The College of the Siskiyou, Dunsmuir Community Gardens, Inc. and Jefferson Economic Development Institute are hereafter collectively referred to as the "Siskiyou Parties."

## I. REPLY

PacifiCorp appreciates the Siskiyou Parties' interest in the Company's proposed solar incentive program and the thorough and considered nature of the Joint Response. PacifiCorp's Reply is limited to the sole issue of responding to the following recommendation provided at Page 14 of the Joint Response regarding transition of administration of PacifiCorp's proposed solar incentive program to a local entity:

The Siskiyou Parties recommend that the Commission approve this condition with a specific timetable for the transition. A realistic goal would be to identify and select a qualified entity or entities in Siskiyou County to administrator the program within four to five months from the date of the Commission's decision in this proceeding approving a Solar Incentive Program for PacifiCorp, and to complete the transition within 12 months from the date that the program is implemented. The initial program administrator should be required to work closely and cooperatively during the twelve month transition period with the selected Siskiyou County administrator(s) to ensure that the transition proceeds smoothly and efficiently.

PacifiCorp is very supportive of the goal of transitioning the administration of the solar incentive program to an entity within PacifiCorp's California service territory, if it can be done in a manner that is cost effective for customers and to the extent that a qualified entity is available. PacifiCorp, however, opposes the prescriptive and exclusionary approach for transitioning the administration of the program recommended in the Joint Response, as it may result in higher costs for customers and ultimately diminish the potential for program success. As indicated in the Stipulation between PacifiCorp and Division of Ratepayer Advocates Regarding PacifiCorp's Application for Approval to Implement a Solar Incentive Program, dated August 2, 2010 (Stipulation), the Company and Division of Ratepayer Advocates agree that PacifiCorp should transition the administration of the program in the future to an entity within the Company's California service territory, *to the extent that such administration is available and cost effective*. See Stipulation, p. 8. There are several counties served by PacifiCorp in its

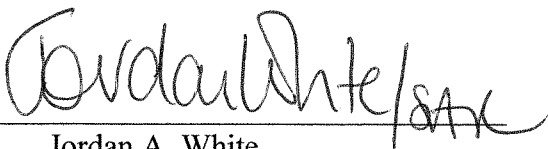
northern California service territory and there is no reasonable basis for limiting the program administrator eligibility to only Siskiyou County, as proposed by the Siskiyou Parties. As such, PacifiCorp believes that the Commission should not preclude participation by other counties in PacifiCorp's California service territory.

In addition, the cost effectiveness qualifier goes to the heart of the fundamental principle driving the development of the program – to provide customers with highest value for the least cost. As an alternative to conditioning the program with a set timeline for transitioning the administration of the program, the Company is willing to commit to the issuance of a request for proposals (RFP) within 12 months of approval of the program for a new program administrator. During the initial phase of the program, the Company believes that its primary objective should be getting the program up and running rather than focusing its scarce resources on retaining a new administrator. More important, an RFP is a necessary tool to allow the Company the opportunity to evaluate competing proposals based on objective factors including, experience, capability and cost effectiveness. While the Company supports the concept of transitioning the administration of a program to a local entity, such a transition is ultimately a business decision that must be made by PacifiCorp with the primary goal of protecting its customers and ensuring successful delivery of the incentive program.

## **II. CONCLUSION**

PacifiCorp appreciates the opportunity to reply to the Siskiyou Parties' Joint Response and looks forward to continued cooperation with stakeholders in developing and implementing a successful solar program.

Respectfully submitted this September 15, 2010, at San Francisco, California.

By   
Jordan A. White

Jordan A. White  
PacifiCorp  
1407 North Temple, Suite 320  
Salt Lake City, UT 84116  
Telephone: (801) 220-2279  
Facsimile: (801) 220-4615  
Email: [jordan.white@pacificorp.com](mailto:jordan.white@pacificorp.com)

Attorney for PacifiCorp

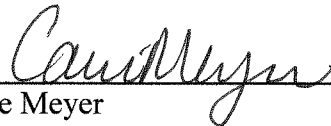
**Certificate of Service**

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 to joint response of College of the Siskiyous, Dunsmuir Community Gardens Inc., and Jefferson Economic Development Institute to PacifiCorp's Supplement to application for approval to implement a solar incentive program, response of the Division of Ratepayer Advocates to PacifiCorp's Supplement to application, and PacifiCorp's reply to the response of the Division of Ratepayer Advocates to PacifiCorp's Supplement to Application** to the following parties:

**Service List  
A.10-03-002**

jordan.white@pacificorp.com	liddell@energyattorney.com	dil@cpuc.ca.gov	jarmstrong@goodinmacbride.co
dhcases@aol.com	nswift@e-jedi.org	lawrence@siskiyous.edu	mrw@mrwassoc.com
erik.anderson@pacificorp.com	jon.fortune@energycenter.org	sephra.ninow@energycenter.or	rafi.hassan@sig.com
janewhang@dwt.com	cem@newsdata.com	abb@eslawfirm.com	californiadockets@pacificorp.c
SGM@cpuc.ca.gov	arr@cpuc.ca.gov	dlf@cpuc.ca.gov	dot@cpuc.ca.gov
jnr@cpuc.ca.gov	mts@cpuc.ca.gov	tcr@cpuc.ca.gov	

DATED: September 15, 2010, at Portland, Oregon



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Carrie Meyer  
Coordinator, Regulatory Operations