

January 14, 2009

VIA E-MAIL

Eric King
Department of Energy
Bonneville Power Administration
P.O. Box 64109
Vancouver, WA 98666-1409
Email: evking@bpa.gov
Attention: Eric King

**Re: Comments of PacifiCorp Company on the BPA Technical Proposal Entitled
“Connecting Variable Generating Resources to the Federal Columbia River
Transmission System (FCRTS)”**

Dear Mr. King:

In this letter, PacifiCorp comments on the Bonneville Power Administration technical proposal dated December 29, 2008, entitled “Connecting Variable Generating Resources to the Federal Columbia River Transmission System (FCRTS).”

By commenting herein PacifiCorp does not waive or consent to any change in its existing contract rights, and PacifiCorp reserves any and all of its contractual and other legal rights.

While PacifiCorp is sympathetic to Bonneville's concerns regarding management of intermittent resources, we believe there are serious flaws in Bonneville's implementation of policies and procedures addressing those concerns. Therefore, PacifiCorp supports and agrees with comments filed by Puget Sound Energy on January 13, 2009 and Portland General Electric on January 14, 2009. PacifiCorp believes that Bonneville should avoid overlapping tariff issues with business practices. We encourage Bonneville to continue to work with entities with intermittent resources within Bonneville's balancing authority area to resolve Bonneville's concerns in a mutually acceptable manner.

Sincerely,

John Apperson
Director, Trading
PacifiCorp

Cc: Stefan Brown, Portland General Electric
Kelsey Colvin, Puget Sound Energy
Phil Obenchain, PacifiCorp