

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

In Reply Refer To:  
PacifiCorp  
Docket Nos. ER07-1419-000  
ER07-1423-000

November 27, 2007

Ms. Amie V. Colby  
Troutman Sanders LLP  
401 9<sup>th</sup> Street, NW Suite 1000  
Washington DC, 20004

Attention: Ms. Amie V. Colby  
Attorney for PacifiCorp

Reference: Notice of Cancellation of Existing Point-to-Point Transmission Service  
Agreement and Submission of New Service Agreement

Dear Ms. Colby:

On September 28, 2007, PacifiCorp submitted in Docket No. ER07-1419-000, a notice of cancellation under its Open Access Transmission Tariff (OATT) for a firm point-to-point transmission service agreement (Service Agreement No. 67) between PacifiCorp and Black Hills Corporation. On September 28, 2007, PacifiCorp also submitted in Docket No. ER07-1423-000, an unexecuted firm point-to-point transmission service agreement (Service Agreement No. 364) between PacifiCorp and Black Hills Power, Inc. (Black Hills), that is intended to replace the currently effective Service Agreement No. 67. Please be advised that PacifiCorp's submittals are deficient, and that additional information and clarifications are required, as described below:

1. PacifiCorp states that sections 22.2 and 17 of its OATT require PacifiCorp to treat Black Hills' request for a modified point of receipt as a "new request for service." Explain what aspects of sections 22.2 and 17 require the creation of a new service agreement and not just a modification of the existing agreement.
2. Please explain in more detail why PacifiCorp chose to omit section 9.0 of the original service agreement, i.e., the list of multiple generating units, from the new service agreement.

3. What is PacifiCorp's justification for the term of the new agreement ending on January 1, 2021, when the existing agreement does not expire until December 31, 2023?
4. Please explain why PacifiCorp included language in section 2.0 of the new service agreement to change the manner in which energy losses are settled, i.e., from in-kind energy in the existing agreement to financial settlements in the new agreement.
5. Please explain the reasons for PacifiCorp's proposal to change the method for calculating ancillary services charges in the new service agreement.

Please submit a response to the information requested above within 15 days of the date of this letter. Submit seven copies of your response to this deficiency letter. Six copies of your response should be sent to:

Federal Energy Regulatory Commission  
Office of the Secretary  
888 First Street, N.E.  
Washington, DC 20426

The seventh copy should be sent to:

Federal Energy Regulatory Commission  
Attention: Aaron Bloom, Room 9M-04  
Office of Energy Market Regulation  
Division of Tariffs and Market Development - West  
888 First Street, N.E.  
Washington, DC 20426

Response to this letter constitutes an amendment to your filings, and a notice will be issued upon receipt of your filing. New sub-dockets will be assigned upon receipt of your filing. Accordingly, along with your response, you should submit a form of notice pursuant to 18 C.F.R. § 35.8(b) that is suitable for publication in the Federal Register together with a copy of the same notice in electronic format.

This order is issued pursuant to the authority delegated to the Director, Division of Tariffs and Market Development – West, under 18 C.F.R § 375.307(k)(2) and is interlocutory. This order is not subject to rehearing pursuant to 18 C.F.R § 385.713.

Docket Nos. ER07-1419-000 and ER07-1423-000

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Sincerely,

Steve P. Rodgers, Director  
Division of Tariffs and Market  
Development – West

cc: All Parties