

ORIGINAL

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December 28, 2005

The Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

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FILED
OFFICE OF THE
SECRETARY
2005 DEC 28 P 4: 26
FEDERAL ENERGY
REGULATORY COMMISSION

RE: *PacifiCorp*
Docket No. ER06-~~000~~
4109-000

Dear Secretary Salas:

Pursuant to Section 205 of the Federal Power Act ("FPA"),¹ Part 35 of the regulations of the Federal Energy Regulatory Commission ("FERC" or the "Commission"),² and the requirements of Order No. 661,³ PacifiCorp hereby submits for filing an original and six copies of tariff sheets to be appended to its Open Access Transmission Tariff ("OATT"). PacifiCorp respectfully requests that these tariff sheets (the "Tariff Sheets") be accepted for filing effective October 14, 2005. These sheets contain no substantive variations from the tariff language included in Order No. 661-A.

I. STATEMENT OF ISSUES.

The issue for the Commission to consider in this proceeding is whether to accept for filing PacifiCorp's proposed Tariff Sheets as compliant with the requirements of Order Nos. 661 and 661-A.

II. DESCRIPTION OF PACIFICORP.

PacifiCorp is an investor-owned utility with its principal place of business in Portland, Oregon. PacifiCorp is primarily engaged in the business of providing electric service to retail

¹ 16 U.S.C. § 824d (2000).

² 18 C.F.R. Part 35 (2005).

³ *Interconnection for Wind Energy*, 111 FERC ¶ 61,353 (2005) ("Order No. 661"), *on reh'g*, 113 FERC ¶ 61,254 (2005) ("Order No. 661-A"). See also *Interconnection for Wind Energy*, 112 FERC ¶ 61,173 (2005) (extending effective date and compliance deadline); *Interconnection for Wind Energy*, Notice Extending Compliance Date, Docket Nos. RM05-4-000, *et al.*, Oct. 28, 2005.

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customers in six western states, *i.e.*, Oregon, Washington, California, Wyoming, Utah, and Idaho. As a load-serving entity, PacifiCorp is responsible for providing reliable and efficient electric service to more than 1.5 million consumers. PacifiCorp owns or controls 8,874 MW of nameplate generating capacity in the form of coal-fired plants, hydroelectric facilities, gas-fired plants, and solar and wind projects.

In addition, PacifiCorp owns approximately 15,763 circuit miles of transmission lines and approximately 57,464 circuit miles of overhead and underground distribution lines. Open access to PacifiCorp's transmission lines is provided pursuant to PacifiCorp's OATT on file with the Commission.⁴ PacifiCorp operates in two control areas: (i) PacifiCorp East ("PACE"), which includes areas of the states of Idaho, Utah, and Wyoming; and (ii) PacifiCorp West ("PACW"), which includes areas of the states of California, Montana, Oregon, Washington, and Wyoming.

On December 15, 2005, the Commission approved a merger application filed by MidAmerican Energy Holding Company ("MEHC"), Scottish Power plc, PacifiCorp Holdings, Inc., and PacifiCorp in which MidAmerican Energy Company ("MidAmerican"), a MEHC subsidiary, would acquire PacifiCorp and its subsidiaries.⁵ MEHC, headquartered in Des Moines, Iowa, is an exempt public utility holding company providing electric service to over 698,000 customers in Illinois, Iowa and South Dakota.

III. COMPLIANCE FILING.

As noted above, the Tariff Sheets – enclosed as Exhibit A – contain no substantive variations from the tariff language included in Order No. 661-A. The only changes from the language in Appendices B and C of Order No. 661-A are: (i) the correction of the reference in the first paragraph of Appendix 7 to be a reference to "Appendix 7," rather than a reference to "Appendix G" and (ii) the striking of what appears to be the erroneous inclusion of the number "606" in Part A.ii of the "Interconnection Requirements for a Wind Generating Plant."⁶ In addition, PacifiCorp has revised two tables of contents of its OATT to reflect the addition of the Tariff Sheets.

⁴ See *PacifiCorp*, 110 FERC ¶ 61,072 (2005).

⁵ *MidAmerican Energy Holdings Co.*, 113 FERC ¶ 61,298 (2005) (approving transaction).

⁶ This section reads, in pertinent part, "reactive capability 606 (taking into account any limitations due to voltage level, real power output, etc.)" (emphasis added).

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Redlined versions of the tariff sheets being changed by PacifiCorp are enclosed as Exhibit B (the two tables of contents and the first sheet of Appendix G to the LGIA).⁷ Insofar as the other Tariff Sheets are new to PacifiCorp's OATT and contain no substantive changes from the tariff language contained in Order No. 661-A, PacifiCorp respectfully requests waiver of any requirement to include additional redlined sheets.

IV. EFFECTIVE DATE.

PacifiCorp requests that the Tariff Sheets be made effective October 14, 2005, the effective date of Order No. 661, and respectfully requests waiver to the extent necessary to permit this effective date. PacifiCorp notes that the provisions in the Tariff Sheets mandated by Order No. 661-A, rather than Order No. 661, need only become effective January 18, 2006 (the effective date of Order No. 661-A). In order for all of the Tariff Sheets to have the same effective date – and thus provide greater simplicity to PacifiCorp's OATT – PacifiCorp requests that all of the Tariff Sheets be accepted for filing effective October 14, 2005.

⁷ PacifiCorp's current OATT contains a placeholder sheet for an Appendix G to the LGIA entitled "Requirements of Generators Relying on Newer Technologies." With the filing of the enclosed Tariff Sheets, PacifiCorp replaces this existing Appendix G with the Appendix G established by Order No. 661.

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V. CONCLUSION.

Based upon the foregoing, PacifiCorp respectfully requests that the Commission accept the Tariff Sheets for filing, effective October 14, 2005, in compliance with Order Nos. 661 and 661-A.

Respectfully submitted,

/s/

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Exhibits

Exhibit A

PacifiCorp
FERC Electric Tariff,
5th Rev Volume No. 11

First Revised Sheet No. 13

ATTACHMENT F 282
Methodology for Completing a Transmission Facilities Study

ATTACHMENT G 283
Index of Point-To-Point Transmission Service Customers

ATTACHMENT H 284
**Form of Service Agreement for Network Integration
Transmission Service**

ATTACHMENT I 291
Form of Network Interconnection and Operating Agreement

ATTACHMENT J 292
Load Ratio Share Specification Table

ATTACHMENT K 293
**Annual Transmission Revenue Requirement for Network
Integration Transmission Service**

ATTACHMENT L 294
Index of Network Integration Transmission Service Customers

ATTACHMENT M 295
**Special Conditions Associated with Transmission Service
Provided Pursuant to State Mandated Retail Access Programs**

ATTACHMENT N 296

APPENDICES TO LGIP

APPENDIX 1 INTERCONNECTION FACILITIES, NETWORK UPGRADES, AND
DISTRIBUTION UPGRADES

APPENDIX 2 INTERCONNECTION FEASIBILITY STUDY AGREEMENT

APPENDIX 3 INTERCONNECTION SYSTEM IMPACT STUDY AGREEMENT

APPENDIX 4 INTERCONNECTION FACILITIES STUDY AGREEMENT

APPENDIX 5 OPTIONAL INTERCONNECTION STUDY AGREEMENT

APPENDIX 6 STANDARD LARGE GENERATOR INTERCONNECTION AGREEMENT

APPENDIX 7 INTERCONNECTION PROCEDURES FOR A WIND GENERATING PLANT

ATTACHMENT O 298
**Form of Service Agreement for Generation Interconnection
Facilities Agreement for generation greater than one (1)
Megawatt and less than twenty (20) Megawatts**

ATTACHMENT P 298
**Form of Service Agreement for Generation Interconnection
Operation and Maintenance Agreement**

Issued by: Jack E. Stamper, Regulatory Manager

Issued on: December 28, 2005

Effective on: October 14, 2005

PacifiCorp
FERC Electric Tariff,
5th Rev Volume No. 11

First Revised Sheet No. 296

ATTACHMENT N

**APPENDICES TO LARGE GENERATOR INTERCONNECTION PROCEDURES
(Refer to Part IV of the Tariff)**

- APPENDIX 1 INTERCONNECTION REQUEST FOR A LARGE GENERATING FACILITY
- APPENDIX 2 INTERCONNECTION FEASIBILITY STUDY AGREEMENT
- APPENDIX 3 INTERCONNECTION SYSTEM IMPACT STUDY AGREEMENT
- APPENDIX 4 INTERCONNECTION FACILITIES STUDY AGREEMENT
- APPENDIX 5 OPTIONAL INTERCONNECTION STUDY AGREEMENT
- APPENDIX 6 STANDARD LARGE GENERATOR INTERCONNECTION AGREEMENT
- APPENDIX 7 INTERCONNECTION PROCEDURES FOR A WIND GENERATING PLANT

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FERC Electric Tariff,
5th Rev Volume No. 11

First Revised Sheet No. 297-108

Appendix G to LGIA

Interconnection Requirements for a Wind Generating Plant

Appendix G sets forth requirements and provisions specific to a wind generating plant. All other requirements of this LGIA continue to apply to wind generating plant interconnections.

A. Technical Standards Applicable to a Wind Generating Plant

i. Low Voltage Ride-Through (LVRT) Capability

A wind generating plant shall be able to remain online during voltage disturbances up to the time periods and associated voltage levels set forth in the standard below. The LVRT standard provides for a transition period standard and a post-transition period standard.

Transition Period LVRT Standard

The transition period standard applies to wind generating plants subject to FERC Order 661 that have either: (i) interconnection agreements signed and filed with the Commission, filed with the Commission in unexecuted form, or filed with the Commission as non-conforming agreements between January 1, 2006 and December 31, 2006, with a scheduled in-service date no later than December 31, 2007, or (ii) wind generating turbines subject to a wind turbine procurement contract executed prior to December 31, 2005, for delivery through 2007.

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Original Sheet No. 297-109

1. Wind generating plants are required to remain in-service during three-phase faults with normal clearing (which is a time period of approximately 4 - 9 cycles) and single line to ground faults with delayed clearing, and subsequent post-fault voltage recovery to prefault voltage unless clearing the fault effectively disconnects the generator from the system. The clearing time requirement for a three-phase fault will be specific to the wind generating plant substation location, as determined by and documented by the transmission provider. The maximum clearing time the wind generating plant shall be required to withstand for a three-phase fault shall be 9 cycles at a voltage as low as 0.15 p.u., as measured at the high side of the wind generating plant step-up transformer (i.e. the transformer that steps the voltage up to the transmission interconnection voltage or "GSU"), after which, if the fault remains following the location-specific normal clearing time for three-phase faults, the wind generating plant may disconnect from the transmission system. This requirement does not apply to faults that would occur between the wind generator terminals and the high side of the GSU or to faults that would result in a voltage lower

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Original Sheet No. 297-110

2. than 0.15 per unit on the high side of the GSU serving the facility.
3. Wind generating plants may be tripped after the fault period if this action is intended as part of a special protection system.
4. Wind generating plants may meet the LVRT requirements of this standard by the performance of the generators or by installing additional equipment (e.g., Static VAR Compensator, etc.) within the wind generating plant or by a combination of generator performance and additional equipment.
5. Existing individual generator units that are, or have been, interconnected to the network at the same location at the effective date of the Appendix G LVRT Standard are exempt from meeting the Appendix G LVRT Standard for the remaining life of the existing generation equipment. Existing individual generator units that are replaced are required to meet the Appendix G LVRT Standard.

Post-transition Period LVRT Standard

All wind generating plants subject to FERC Order No. 661 and not covered by the transition period described above must meet the following requirements:

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Original Sheet No. 297-111

1. Wind generating plants are required to remain in-service during three-phase faults with normal clearing (which is a time period of approximately 4 - 9 cycles) and single line to ground faults with delayed clearing, and subsequent post-fault voltage recovery to pre-fault voltage unless clearing the fault effectively disconnects the generator from the system. The clearing time requirement for a three-phase fault will be specific to the wind generating plant substation location, as determined by and documented by the transmission provider. The maximum clearing time the wind generating plant shall be required to withstand for a three-phase fault shall be 9 cycles after which, if the fault remains following the location-specific normal clearing time for three-phase faults, the wind generating plant may disconnect from the transmission system. A wind generating plant shall remain interconnected during such a fault on the transmission system for a voltage level as low as zero volts, as measured at the high voltage side of the wind GSU.
2. This requirement does not apply to faults that would occur between the wind generator terminals and the high side of the GSU.

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3. Wind generating plants may be tripped after the fault period if this action is intended as part of a special protection system.
4. Wind generating plants may meet the LVRT requirements of this standard by the performance of the generators or by installing additional equipment (e.g., Static VAR Compensator) within the wind generating plant or by a combination of generator performance and additional equipment.
5. Existing individual generator units that are, or have been, interconnected to the network at the same location at the effective date of the Appendix G LVRT Standard are exempt from meeting the Appendix G LVRT Standard for the remaining life of the existing generation equipment.
Existing individual generator units that are replaced are required to meet the Appendix G LVRT Standard.

ii. Power Factor Design Criteria (Reactive Power)

A wind generating plant shall maintain a power factor within the range of 0.95 leading to 0.95 lagging, measured at the Point of Interconnection as defined in this LGIA, if the Transmission Provider's System Impact Study shows that such a requirement is necessary to ensure safety or reliability. The power factor range standard can be met by using, for example,

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**APPENDIX 7 to LGIP
INTERCONNECTION PROCEDURES FOR A
WIND GENERATING PLANT**

Appendix 7 sets forth procedures specific to a wind generating plant. All other requirements of this LGIP continue to apply to wind generating plant interconnections.

A. Special Procedures Applicable to Wind Generators

The wind plant Interconnection Customer, in completing the Interconnection Request required by section 3.3 of this LGIP, may provide to the Transmission Provider a set of preliminary electrical design specifications depicting the wind plant as a single equivalent generator. Upon satisfying these and other applicable Interconnection Request conditions, the wind plant may enter the queue and receive the base case data as provided for in this LGIP.

No later than six months after submitting an Interconnection Request completed in this manner, the wind plant Interconnection Customer must submit completed detailed electrical design specifications and other data (including collector system layout data) needed to allow the Transmission Provider to complete the System Impact Study.

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Exhibit B

PacifiCorp First Revised Substitute Original Sheet No. 13
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ATTACHMENT N

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Appendix G to LGIA

Requirements of Generators Relying on Newer Technologies Interconnection Requirements for a Wind Generating Plant

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and December 31, 2006, with a scheduled in-service date no later
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to a wind turbine procurement contract executed prior to
December 31, 2005, for delivery through 2007.