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Salt Lake City, Utah 84111

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IDAHO PUBLIC  
UTILITIES COMMISSION

March 9, 2011

**VIA OVERNIGHT DELIVERY**

Idaho Public Service Commission  
472 W. Washington Street  
P.O. Box 83720  
Boise, Idaho 83720-0074

Attention: Jean D. Jewell  
Commission Secretary

RE: Case No. PAC-E-11-09, In the Matter of the Application of PACIFICORP for authority to (1) issue its promissory notes to and borrow from commercial banks for (a) not more than \$1.5 billion under revolving credit agreements, and (b) not more than \$1.5 billion under other borrowing arrangements; and (2) issue and sell its commercial paper in principal amounts not to exceed \$1.5 billion outstanding at any one time.

Please find enclosed the original and seven (7) copies of Rocky Mountain Power's application for an order extending the short-term debt authorities granted to the Company in Case No. PAC-E-06-01 for an additional five years, or through April 30, 2016, on the condition that the Company's senior secured debt be rated at "investment grade" by both Standard & Poor's Rating Service and Moody's Investor Services, Inc, and a draft order implementing the same.

Please contact Daniel Solander directly at (801)220-4014 if you have any further questions.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation

Enclosures

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IDAHO PUBLIC UTILITIES COMMISSION

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201 South Main, Suite 2400  
Salt Lake City UT 84111  
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Email: daniel.solander@pacificorp.com

*Attorneys for Rocky Mountain Power*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF )	
ROCKY MOUNTAIN POWER FOR AN )	CASE NO. PAC-E-11-09
ORDER EXTENDING THE SHORT-TERM )	
DEBT AUTHORITIES GRANTED IN )	
CASE NO. PAC-E-06-01 )	<b>APPLICATION</b>

COMES NOW, Rocky Mountain Power, a division of PacifiCorp (the "Company"), and hereby applies to the Idaho Public Utilities Commission (the "Commission") for an order extending the short-term debt authorities granted to the Company in Case No. PAC-E-06-1 for an additional five years, or through April 30, 2016, on the condition that the Company's senior secured debt be rated at "investment grade" by both Standard & Poor's Rating Service and Moody's Investor Services, Inc. In support of its Application, the Company states as follows:

1. Rocky Mountain Power is an electrical company and public service company in the state of Idaho, subject to the jurisdiction of the Commission with regard to its rates, service and accounting practices. Rocky Mountain Power also provides retail electricity service in the states of Oregon, California, Washington, Utah and Wyoming. Rocky Mountain Power's address is 201 S. Main St., Salt Lake City, Utah 84111.
2. Communications regarding this Application should be addressed to:

Ted Weston  
Idaho State Manager  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84140  
Telephone: (801) 220-2963  
Facsimile: (801) 220- 2798  
E-mail: [Ted.Weston@PacifiCorp.com](mailto:Ted.Weston@PacifiCorp.com)

Daniel Solander  
Senior Counsel  
Rocky Mountain Power  
201 South Main, Suite 2300  
Salt Lake City UT 84111  
Telephone: (801) 220-4014  
Facsimile: (801) 220-3299  
E-mail: [Daniel.Solander@PacifiCorp.com](mailto:Daniel.Solander@PacifiCorp.com)

In addition, Rocky Mountain Power respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Ted Weston, State Manager (801) 220-2963.

3. On February 24, 2006, PacifiCorp filed an Application requesting authorization to borrow not more than \$1.5 billion aggregate principal amount in short-term debt through April 30, 2011. On March 14, 2006, the Commission granted the Company's Application in Order No. 29999.

4. The Company is now requesting that the authorities granted under Case No. PAC-E-06-01 be extended for an additional five years, or through April 30, 2016, on the condition that the Company's senior secured debt be rated at "investment grade" by both

Standard & Poor's Rating Service and Moody's Investor Services, Inc. The other terms and conditions of the authorities specified in Order No. 29999 would not be changed.

5. The Company respectfully requests that the Commission enter its order, effective upon issuance, authorizing the Company to (1) issue, from time to time through April 30, 2016, its unsecured short-term promissory notes to and borrow from U.S. or foreign commercial banks (or their affiliates) under the following facilities: (a) not more than \$1.5 billion in aggregate principal amount outstanding at any one time under one or more revolving credit agreements (Agreements); and (b) not more than \$1.5 billion in aggregate principal amount outstanding at any one time under other borrowing arrangements (Other Arrangements); and (2) issue and sell its commercial paper (Paper) in the U.S. or overseas, from time to time through April 30, 2016, in aggregate principal amounts not to exceed \$1.5 billion outstanding at any one time; provided that the aggregate principal amounts outstanding under the Agreements, Other Arrangements and Paper not exceed \$1.5 billion at any one time.

6. The Company currently has two revolving credit agreements totaling \$1.395 billion, under the terms of which the Company may borrow up to the full amount or have letters of credit issued in an amount up to \$400 million or a combination thereof. These credit agreements currently have final termination dates of October 23, 2012 (\$635 million of commitments presently) and July 6, 2013 (\$760 million of commitments presently).

7. Without the Commission's extension of the authorities most recently granted in Order No. 29999, the Company will be unable to utilize the credit agreements after April 30, 2011, or to arrange for the issuance of letter of credit pursuant to the credit agreements. For the Commission's reference copies of these credit agreements were previously provided on February 23, 2006, in PAC-E-03-11 and October 31, 2007, in PAC-E-06-1. Further, the Company will be

significantly limited in its ability to issue commercial paper after April 30, 2011 without the Commission's extension of the authorities previously granted.

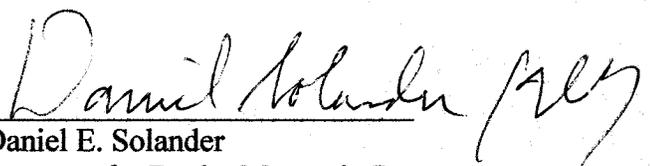
**MODIFIED PROCEDURE**

8. Rocky Mountain Power believes that consideration of the proposals contained in this Application does not require an evidentiary proceeding, and accordingly the Company requests that this Application be processed under RP 201 allowing for consideration of issues under modified procedure, i.e., by written submissions rather than by an evidentiary hearing.

WHEREFORE, Rocky Mountain Power respectfully requests an Order extending the authorities granted to the Company under Case No. PAC-E-06-1 for an additional five years, or through April 30, 2016, on the condition that the Company's senior secured debt be rated at "investment grade" by both Standard & Poor's Rating Service and Moody's Investor Services, Inc.

DATED: March 9, 2011.

Respectfully submitted,

  
Daniel E. Solander  
Attorney for Rocky Mountain Power