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February 3, 2015

Secretary Sally Jewell
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Subject: Request for Extension of Time to Provide Comments to Proposed Rule Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform (ONRR-2012-0004 (RIN 1012-AA13))

Dear Secretary Jewell:

On behalf of PacifiCorp and its affiliates, we hereby request a 90-day extension to provide comments to the referenced proposed rule “Consolidated Federal Oil and Gas and Federal and Indian Coal Valuation Reform.”

PacifiCorp is one of the West's leading utilities, serving approximately 1.8 million customers in six states. This utility has a diverse generation mix utilizing hydroelectric, coal, natural gas, geothermal and wind sources produced through PacifiCorp Energy, a division of PacifiCorp. PacifiCorp is comprised of three business units including Pacific Power and Rocky Mountain Power which provides electric service to customers in Utah, Idaho, Wyoming, Oregon, Washington and northern California.

In addition, PacifiCorp through its subsidiaries and affiliates is a producer of federal coal from captive coal mines serving our power plants of which these costs flow through to our customers. As a regulated utility, we have an obligation to better understand the implications of this proposed rule and the impacts to our customers given the proposed changes involving both arm's length and non-arm's length contracts for the calculation of production royalties. The complexity of these proposed rules requires additional time to review the possible consequences of the proposed changes and to provide informed comments to the Department of Interior's Office of Natural Resources Revenue to help develop a sensible policy for production royalties from federal lessees, buyers of oil, gas, and coal, taxpayers, and others impacted by such a change.

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For this reason, we are requesting that you provide a 90-day extension of the comment period for this proposed rule.

This is a significant issue facing our operations and customers. Your consideration and immediate attention to this important matter is greatly appreciated.

Respectfully,



Micheal G. Dunn
President
PacifiCorp Energy

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