Clean Energy Implementation Plan (CEIP) Engagement Series

August 2024 Meeting Notes

Tuesday, August 6, 2024, 9:00 -12:00 pm Pacific Time

These notes were synthesized and summarized by E Source, PacifiCorp's meeting facilitation partner.

Executive Summary

There were **36 people in attendance**, including members of the public and PacifiCorp representatives, at the second iteration of the Clean Energy Implementation Plan Engagement Series meeting this year. The virtual meeting, which was hosted via the Zoom platform, provided Clean Energy Implementation Plan (CEIP) biennial report updates, reviewed expanded CBIs and metrics, and revisited introduced Distribution System Planning (DSP) solutions and engagement. To maximize accessibility, the meeting was recorded for those who could not attend and Spanish and ASL interpretation/translation were provided.

The following is a summary of the content and feedback received during the 3-hour public meeting.

Session Objectives

1. Review 2024 CEIP Progress Report interim targets.
2. Highlight Customer Benefit Indicator metrics, utility actions, and incremental costs.
3. Communicate Vulnerable Population workshop and Integrated Resource Planning updates.

Opening

E Source facilitator, Jeffrey Daigle, opened the CEIP meeting by welcoming the attendees and thanking the public for continued participation. Public perspectives are essential to achieving meaningful impacts on communities. Mr. Daigle reviewed meeting experience items, provided an overview of the agenda and objectives, and introduced the presenters.

Clean Energy Implementation Plan

Rohini Ghosh, Regulatory Projects Director at Pacific Power, provided Clean Energy Implementation Plan updates. The company filed its biennial CEIP update in November of 2023, which serves as a two-year update to the original and revised CEIP that was originally submitted. This biennial update is the first significant update to the Pacific Power's targets and modeling assumptions, resulting in lower near term clean energy and interim targets in the biennial CEIP. In March 2024, The Washington Utilities and

Transportation Commission (WUTC) initiated an adjudication to resolve the Company's 2023 Biennial CEIP Update. Pacific Power gave testimony on June 17, 2024, and held a second settlement conference on July 11, 2024. An agreement has not been reached; thus, the company will continue moving through the full adjudication process. The latest date for decision is the end of year, but in the meantime the company moves forward on planning, growth, and updates and is currently gearing up planning for the 2025 CEIP filing. A public comment hearing has been scheduled for October 10, 2024, at 6:00PM. PacifiCorp customers can comment to the UTC by calling in to the hearing via telephone or joining via Zoom.

The Company continues to work with parties to resolve the issues presented, and a Commission decision on the CEIP Update is expected at the end of this year. Updated filings are always available on the PacifiCorp and WUTC websites, members should look out for updates on the annual progress report after filing. Key takeaways and a summary of the report will be provided in future engagement spaces. Written feedback is always welcomed in the space for those uncomfortable speaking in a public forum, pushing for a collaborative environment and acknowledges that there is a lot of information that may be digested later and prompt questions or feedback.

In accordance with the Clean Energy Transformation Act rules, every utility submits a Clean Energy Implementation Plan every four years and an update to that every two years in between. PacifiCorp's CEIP is always a forward-looking long-term plan for where the company forecasts it will be in relation to various goals and targets over time.

On July 1, 2024, the 2024 CEIP progress report was submitted, reflecting on where the company has been, including:

- Actuals reports for 2023
- A detailed summary regarding PacifiCorp's progress towards its targets and specific actions as set out by its inaugural CEIP
- Information on:
    - Conservation achievement
    - Demand response program achievement
    - Renewable energy credits, all resource generation, contracts and market purchases and sales
    - Washington retail sales
    - Additional information required by the settlement of the 2021 CEIP

Looking back at 2023, PacifiCorp's original target goal was to serve Washington retail sales or load with 31% renewable or non-emitting energy, which is reported through renewable energy credit (REC) accounting. The company made great progress towards the goal and fell just shy of the target, landing at 30.8% as demonstrated in Table 1 below.

Table 1

PacifiCorp CEIP Interim Goal for 2023	**31%**	
	MWh	**% of Retail Sales**
Washington Retail Sales	3,850,048	
Washington PURPA Qualifying Facilities (QFs)	5,224	
Retail Sales (QF Adjusted)	3,844,824	

Washington Allocated Renewable Energy and RECs (Renewable Energy Certificate)	928,528	24.2%
Washington Allocated BPA Renewable Energy	16,048	0.4%
Washington Allocated BPA Non-Emitting Energy	2,325	0.1%
Total electricity supplied by non-emitting and renewable resources in 2023 (excluding WA-allocated system RECs)	**946,601**	**24.6%**
WA-Allocated PacifiCorp System RECs – Reported in RPS	84,600	2.2%
WA-Allocated PacifiCorp System RECs[3]	152,619	4.0%
Total electricity supplied by non-emitting and renewable resources in 2023[4]	**1,184,120**	**30.8%**

Customer Benefit Indicators (CBIs), Utility Actions & Metrics

One settlement condition required the company to redefine or expand on the definition of CBI and the associated metrics. These proposed changes resulted in one new and one expanded CBI and four expanded and twelve new metrics. New metrics will address new data that will be incorporated while expanded metrics further define and include other representations of data (percentages, averages, etc.).

Lee Elder, Load Forecasting Manager, highlighted efforts done working towards CBI #1:

1. Increase culturally and linguistically responsive outreach and program communications
    - *This CBI expanded to include increased availability of translation services for all PacifiCorp programs, including credit, collection, and payment*
    - New metrics include:
        - Number of programs for which PacifiCorp provides translation services or translated material
        - Number of languages PacifiCorp uses for translated material

Omar Granados, Senior Communications Representative, elaborated on the number of languages PacifiCorp uses for translated material. PacifiCorp is committed to proactively increasing access and better communicating with the 30.7% of Spanish households within its' Washington service area. In 2023, PacifiCorp expanded communication channels for Spanish-language outreach to include 44 options versus 43 in 2022 and 17 in 2020. These communication channels encompass customer service, energy assistance, Wattsmart business and residential, energy efficiency education, wildfire safety, general safety, and preparedness, planning for the future, energy resource center, and regulatory/CEIP. Additionally, the 2023 residential and CETA public surveys were administered in Spanish yielding a response rate of 5.40% in highly impacted communities and 2.40% response rate in all Spanish speaking customers across the board. PacifiCorp offers translation services for 91 languages with 73 languages available when customers call the company's call center, as shown in table 2.

Table 2

Program	Number of Languages Used for Translated Materials	Format (e.g., telephone translation, brochure, notice, website)
Billing Options / Customer Service	73*	Telephone

Billing Options / Customer Service	1	Website, bill message
Energy Assistance (LIBA)	1	Advertising, social media, brochures
Wattsmart Residential	1	Advertising, bill inserts, emails, social media, brochures
Wattsmart Business	1	Advertising, emails, direct mail, brochures
Energy Efficiency Education	1	Brochures
Wildfire Safety/Resilience	9	Advertising, website, email, brochures
Safety/Preparedness	1	Social media, website, email
Planning for the Future	1	Advertising
Energy Resource Center	1	Website, brochures
Regulatory/CEIP	1	Website, meetings, meeting materials
Total		

Meeting Discussion:

- Paul Barrager asked if the company uses translation software for non-Spanish languages or is there a 3rd party service?
    - Mr. Granados explained that the company uses a 3rd party service to employ professional translators.

In 2023, the company strategized an annual conservation plan to continue supporting programs with an increased equity focus using effective communication strategies to reach Named Communities and continuing to increase culturally and linguistically responsive outreach and marketing to promote awareness of energy and conservation programs. Additionally, the conservation plan continues to expand in-language services across written, spoken, and visual services. The conservation plan was implemented via expanded outreach methods aimed towards underserved and diverse communities through work with a multicultural marketing agency to develop a media plan including culturally relevant messaging, collaborating with local influencers and media partners trusted by the community, and engaging communities where they are.

Outreach methods encompass an updated Spanish landing page of the PacifiCorp website, radio and video interviews, influencer Facebook posts, and printed content shared with community partners. The residential campaign began with TV interviews on May 9th, followed up with influencer posts, and ending with print on June 30th. This campaign resulted in thousands of likes, and hundreds of comments and shares. Google analytics results indicate an increase of approximately 2000% in user uptake from the inception of the Wattsmart Residential Multicultural Campaign.

Lee Elder, Load Forecasting Manager, highlighted CBIs related to energy efficiency and the updated metrics to CBI 3, CBI 4 remains unchanged:

3. Increase participation in company energy and efficiency programs and billing assistance programs

- *Metrics were refined to include percentages in addition to number of households/businesses participating in company programs*
- New metrics include:
    - Number of residential appliances and equipment rebates provided to Named Community customers (where known)
    - Number of residential rebates provided to customers residing in rental units
    - Investment and/or energy efficiency savings in rental residential housing stock

4. Increase efficiency of housing stock and small businesses, including low-income housing

Nancy Goddard, Wattsmart Business Program Manager, explained legislation acts the company complies with to design and deliver energy efficiency programs.

- Energy Independence Act (EIA)
    - Program changes and adaptive management to achieve biennial conservation target with a cost-effective portfolio of programs
    - Including program changes related to routine updates:
        - Regional technical forum updates, updated codes/standards, Energy Star, etc.
- Clean Energy Transformation Act (CETA)
    - Program changes and utility actions to increase Named Community customer participation
    - Customers in Highly Impacted Communities & Vulnerable Populations

The plans for CETA and the EIA have defined utility actions specifically intended to move the needle on customer benefit indicator metrics and reach more vulnerable populations specifically, renters, limited English speaking customers, and low-income customers.

Jay Olson, Senior Residential Program Manager, recapped 2023 efforts and results for the Home Energy Savings program as shown on the graph below.

From 2022 to 2023, Home Energy Savings participation in highly impacted communities increased from 317 to just under 1400, through incentives such as the direct install offer, a delivery approach where the company hires a contractor to install the equipment materials at no cost to the customer. The company pays the contractor a per unit rate for each install, allowing the contractors to focus primarily on highly impacted communities. As a result of these measures and extending the program from summer months to all year round, direct install engagement in highly impacted communities increased from 20% in 2022 to over 90% in 2023.

Nancy Goddard reviewed energy efficiency for commercial customers enrolled in the Wattsmart Business program. The utility took actions to provide higher incentives for very small to small businesses in highly impacted communities such as covering 100% of installation costs for lighting upgrades. A small business not located in a highly impacted community could only receive up to 90% of the installation costs. Wattsmart Business program also incentivizes HVAC equipment and installation. In 2020, PacifiCorp completed lighting retrofits at 31 small businesses in highly impacted communities. By 2023 this number increased to 166. The forecasted incremental cost for CETA for 2024-2025 is $720,000.

Charity Spires, Low-Income Program Manager, presented two utility actions related to low-income weatherization.

1) Continue to allow reimbursement for repairs up to 30% of the annual reimbursement on energy efficient measures received (increased from 15% in 2022)

2) Continue to allow installation of electric heat to replace permanently installed electric heat, space heaters, or any fuel source except natural gas with adequate combustion are determined by the Agency. This is designated to promote the installation of electric heat and minimize use of wood heat, solid fuels, or natural draft equipment in specific applications where combustion safety (and indoor air quality) cannot be maintained.

PacifiCorp has partnered with low-Income weather community action agencies for delivery of weatherization, however, since approval in February 2022, there has not been any fuel conversions. The company continues to work closely with community action agencies to identify homes that could potentially benefit from fuel conversions. The forecasted incremental cost for CETA for 2024-2025 is $65,000.

Meeting Discussion:

- Charlie asked what exactly is the higher incentive offered to small businesses in highly impacted communities?
    - Nancy Goddard shared more details about the incentive, adding that for small businesses in highly impacted communities the cap is 100% of the project cost compared to 90% in small businesses not located in highly impacted communities. Additionally, the incentive per kilowatt hour is higher for lighting retrofitting.
- Paul Barrager asked for the definition of CETA incremental costs and how it is related to total expenditures.
    - Ms. Goddard defined CETA incremental costs as the comparison of the incentive paid at the regular small business rate versus what the company paid at the higher incentive rate for small businesses located in highly impacted communities. In simplified terms, it is what the company did with the CETA utility action and what would the company have done absent CETA and utility actions, the difference is the CETA incremental cost.
        - Ms. Spires offered more clarity around CETA costs for low-income weatherization, sharing that repair costs up to 15% of the annual reimbursement and energy efficiency measures are considered regular costs. However, anything exceeding 15% up to 30% would be CETA incremental costs.

Ms. Goddard reviewed utility actions related to participation tracking to change how the company is collecting information on application to get more specific details relevant to tracking CBI metrics. For low-income weatherization, home energy savings, and the Wattsmart business program, the applications have been adapted to ask how many, if any, participants in the household or business speak a primary language other than English. For the home energy savings program, participants are also asked if they rent or own their home.

Jeffrey Daigle reviewed the demand response programs launched including Irrigation Load Control, Commercial/Industrial demand response, Residential Demand Response, Battery Demand Response, and EV (Electric vehicles) Managed Charging. In 2022, 2 customers participated in the programs on a test basis. By the end of 2023, 133 customers were enrolled in the portfolio of programs with 52 being in highly impacted communities. Most of this enrollment was in the irrigation program. As the company looks forward to 2024, the goal is to illustrate expansion in enrollment in the commercial/demand response program and launch the Optimal Time Rewards program – which will enroll smart thermostats and electric water heaters for residential customers.

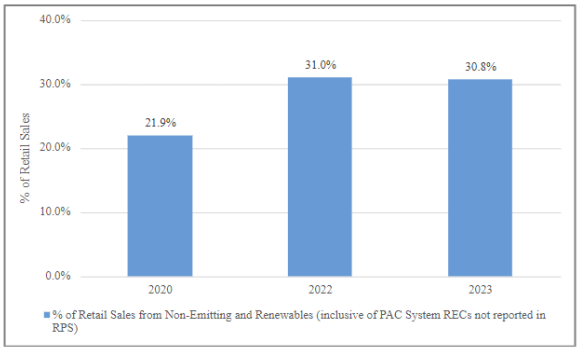
Lee Elder introduced CBI 5 which remains unchanged:

5. Increase renewable energy resources and reduce emissions

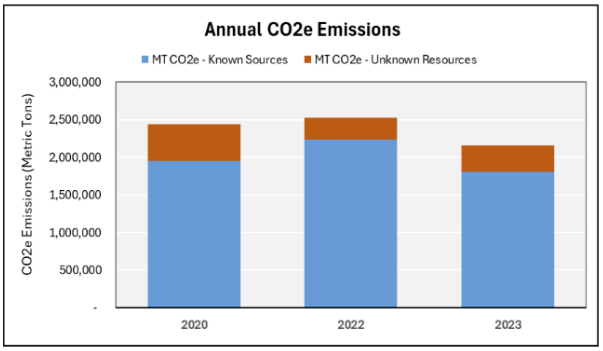
- Metrics include a) amount of renewable/non-emitting resources serving Washington b) amount of Washington allocated greenhouse gas emissions from Washington allocated resources

Rohini Gosh reviewed the data related to CBI 5 looking at percentage of Washington retail sales served by renewable/non-emitting energy resources for 2020-2023. Since 2021, the company has been on an upward trajectory of increasing available renewable/non-emitting resources to serve Washington and expecting to continue increasing over time. Relating to metric B of CBI 5, Ms. Gosh highlighted the decline of annual CO2e emissions from 2020 to 2023 as the company brought in more renewables and non-emitting generation to the system to transition out of coal resources for Washington. The company forecasts those emissions continuing to fall. Recent procurement efforts include 1,900 MW of renewable and storage capacity to come online through the end of 2026.

Percentage Retail Sales Served by Renewable & Non-Emitting Energy Resources



Washington Allocated Greenhouse Gas Emissions



Meeting Discussion:

- Jaclynn Simmons asked if the additional 1,900 MW are the resources from the 2020 ASRFP?
  - Ms. Gosh shared that the resources were identified in the 2020 ASRFP and contracted and signed over the last year or two.

2025 CEIP

Rohini Gosh reviewed the 2025 CEIP engagement planning cycle, with a proposed goal of 3-4 CEIP engagement series meetings to socialize the CEIP and IRP and discuss work towards the 2025 settlement conditions for the filing on October 1, 2025. The team is also open to thinking of other ways of engaging with the public and interested parties. If you have any comments or feedback, please contact CEIP@pacificorp.com. Additional settlement conditions from the 2021 revised CEIP settlement for the 2025 CEIP are:

- PacifiCorp will develop a transparent methodology for CBIs and metrics that are appropriate for future resource planning and acquisition decisions. This will include changes to its weighting and scoring process for future resource acquisition processes.

- PacifiCorp will improve data transparency specific to modeling inputs and outputs (PLEXOS modeling software and workpapers) and opportunities for all interested parties to sign non-disclosure agreements and review confidential information
- PacifiCorp will conduct distribution system planning (DSP) for Washington
- PacifiCorp will file a draft CEIP based on a timeline agreed to by the Company and Interested Parties
- PacifiCorp will advance application of Non-Energy Impacts (NEIs) and Customer Benefit Indicators (CBIs) to all resource and program selections and will consult with advisory groups on the appropriate methodology
- PacifiCorp will include applicable provisions of the Inflation Reduction Act (IRA) plus other program impacts, if warranted
- PacifiCorp will include details regarding the Company's marketing plans with regards its community outreach and engagement
- PacifiCorp will fully engage with all advisory groups and offer at least one joint consultation session to share feedback on the CEIP, CEIP updates, and the consultation process itself.
- Additional miscellaneous conditions related to narrative, transparency, improvements upon planning and procurement process, modeling sensitivities and vulnerable populations

The next CEIP engagement series meeting will be held on October 29, 2024 at 9am via Zoom to expand on outcomes from the 2025 IRP and revisit analysis.

Integrated Resource Plan

Randy Baker, Director of Resource Planning at Pacific Corp, reviewed the Integrated Resource Planning (IRP) cycle. A key purpose of the IRP is to identify the needs of the PacifiCorp system, and the resources needed to maintain reliability and provide efficient cost-effective power to customers. The Integrated Resource Plan document is typically around 800 pages in total in two volumes and includes a lot of other information that reports on what the company is doing in a host of different areas. The 2025 IRP cycle launched on January 25th with the first public meeting in the series. The IRP itself is a 20-year long term forecast of PacifiCorp's six state system, which includes Washington, ran two-year cycle as shown below. The state of Washington operates on a four-year cycle, but that cycle is punctuated by key updates and reports including those related to CETA and the CEIP. Washington benefits from the two-year cycle of the other states in that the company produces a full-fledged integrated resource plan every two years.

PacifiCorp is in the middle of its 2025 integrated resource planning cycle due to file March 31st of 2025, as indicated by the gold star. This phase engages in committing data, modelling updates, and locking down assumptions. Months 14 and 15 of the cycle, that is where the IRP team puts the final changes on the file. The document will be publicly available at the PacifiCorp website for viewing upon filing.

It is important to note, the details and data that pours into this process and get discussed in public input meeting series, is just a plan and plans change. The IRP is updated regularly because it goes out 20 years ahead and there are still a lot of unknowns as it is based on forecasts and proxy-based assumptions.

According to the schedule, the team expects to be running mathematical models in about two months. The company will be presenting a draft of the IRP by January 1st, 2025, with the final filing of the IRP on March 31st, 2025.

There are two upcoming public meetings in which comments are welcomed.

- Wednesday-Thursday, August 14-15, 2024 – General Public Input Meeting 6
- Wednesday-Thursday, September 25-26, 2024 – General Public Input Meeting 7
    - Model assumptions will be locked down for the draft IRP after this meeting

The draft IRP will be distributed on January 1, 2025, with two public meetings following, then the final filing on March 31, 2025.

- Wednesday-Thursday, January 22-23, 2024 – General Public Input Meeting 8
- Wednesday-Thursday, February 26-27, 2024 – General Public Input Meeting 9

Lee Elder shared details of the upcoming Vulnerable Populations workshop on August 28, 2024, at 1pm. The goal is to review and improve the company's approach to identifying and tracking vulnerable populations by reviewing the CEIP vulnerable population approach and discussing and seeking input on new geographic vulnerable population designation approach. Furthermore, the group will discuss additional vulnerability factors to consider with the geographic designation approach.

Distribution System Planning

Ian Hoogendam, Distribution Systems Planning (DSP) Manager at Pacific Power, introduced the company's plan to advance DSP within Washington service areas. In the last workshop, the group discussed significant changes in Oregon to the distribution grid, including the integration of modern technologies and generation, increased measurement capabilities, and emerging opportunities for non-wires/nontraditional solutions which require advanced development and screening to identify suitable candidate solutions. Throughout the process, stakeholders and community input has been key in the development of solutions to increase transparency in planning. This planning has impacted Washington CBIs as the company aims to increase participation in company energy and efficiency programs, improve energy efficiency, reduce frequency and duration of energy outages, and increase community focused efforts and investments.

Mr. Hoogendam shared an overview of the Washington service area, highlighting key statistics such as substations, circuits, and customer counts. The distribution system is comprised of 33 substations (66% SCADA coverage), 140 circuits (53% SCADA coverage), 3,363 miles of overhead lines and 751 miles of underground lines. This system serves 114,000 residential customers, 18,000 commercial customers, 5,000 irrigation customers, and 500 industrial customers. In comparison to the Oregon system, Washington is much smaller with fewer customers, substations, and circuits.

Mr. Hoogendam also explored the role of SCADA and advanced metering infrastructure (AMI) in enhancing distribution planning efforts. A primary focus of advanced of distribution system planning has been forecasting and complexity due to modern grids. Forecasting with AMI allows the company to fill in gaps where the utility does not have SCADA measurements, it provides more granularity and confidence in growth rates and load profiles, and growth is based on independent circuit load transfers.

AMI data helps to identify grid needs because:

- Each circuit is unique
- Disaggregation by customer class to better understand characteristics of growth

- Better models for peak load events
- Voltage measurements from meters can be used to identify power quality

AMI data helps with solution identification using:

- Advanced analytics produces comprehensive understanding for targeted solution opportunities
    - Electrification: EV charging detection, AC adoption, Heating, Appliances
    - Impacts of solar adoption
    - Impacts of zoning changes
    - Targeting energy programs for different customer classes

Shauna Thomas, T & D program specialist, explored the funding differences between Oregon and Washington. DSP has implementation partners for certain non-traditional solutions in Oregon and Washington, such as energy efficiency programs which vary from switching to heat bumps to upgrading appliances to weatherization. The differences between Washington and Oregon's implementation programs start with how money for these programs is collected and distributed. In Oregon, SB1144 and SB-838 allow PacifiCorp to collect a percentage of money from its ratepayer on behalf of the nonprofit Energy Trust of Oregon, also known as the ETO. The funds collected are called a public purpose charge and are budgeted for cost effective energy programs throughout the state. In Washington, funds for similar programs are collected through the Schedule 191, a tariff that recovers costs incurred by the company associated with providing demand side management services and other programs to customers, called the system benefit charge. The energy efficiency and demand side programs are then run through PacifiCorp's own internal department.

When DSP finds grid needs in Oregon, the team works with the ETO to implement a targeted load management solution, which would be different cost-effective programs that the ETO runs as a program administrator. Currently, PacifiCorp is working with the ETO to develop a targeted load management solution in Central Oregon and assess 1) what kind of load reduction can be achieved with ETO program 2) what timeline those load reductions can be achieved 3) what partners they'll work with in the field and 4) how ETO will lead the program.

When DSP finds grid needs in Washington, the team works with demand side management colleagues and partners, such as non-profits, to implement and lead targeted load management solutions.

Mr. Hoogendam explained resiliency in distribution system planning as the team begins to consider resilience as a grid need. 3 components of resiliency are:

1. Community resilience to long duration outages as indicated by:
    a. Health
    b. Preparedness
    c. Evacuation
2. Utility resilience as indicated by:
    a. Outage duration
3. Community-utility resilience as indicated by:
    a. Percentile of utility resilience

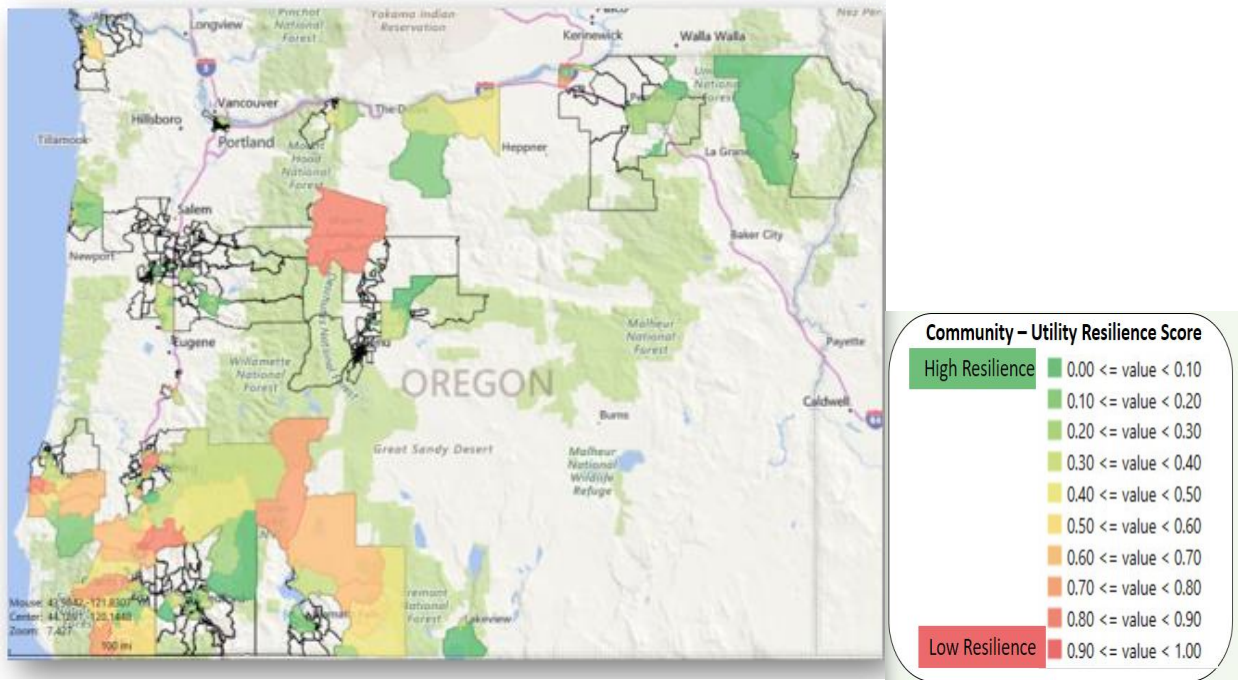
To track resilience, data is pulled from the Census Bureau, CDC, and other utilities to develop a health vulnerability score for each census block group within service areas. Populations more vulnerable

include those with chronic diseases such as asthma, heart disease, and diabetes. Preparedness factors income, language barriers, and household size. Evacuation explores the intent to evacuate and any barriers preventing it, such as number of people in the household, disabilities, and transportation access. Considering these factors, the DSP team produces a composite vulnerability score for each community to long duration outages to calculate a utility resilience score. The utility resilience score also calculates the percentile for the community component that each census block has and the percentile of the utility resilience. The percentiles then determine the most impacted communities within PacifiCorp service territory.

Another factor in the resilience analysis is the Environmental Justice (40) disadvantaged communities metrics. EJ 40 communities can be identified to explore grant opportunities that can lower the financial barriers to implementing a solution to reduce outage vulnerability. Disadvantaged communities are defined as census tract that exceeds one or more of the following category thresholds:

- Climate change
- Energy
- Health
- Housing
- Legacy pollution
- Transportation
- Water and wastewater
- Workforce development

Below is a map illustrating census block group vulnerability across Oregon with EJ40 disadvantaged communities filtered, which is used to identify opportunities to improve resilience and potential partners in forming resilience hubs.



FEMA and the Red Cross have collaborated on a database to list facilities that can serve as a shelter in the event of a disaster, also has indication of whether these facilities have backup generation. This database can also be layered on community resilience score maps to identify opportunities to partner with the owners of these facilities to join distribution planning engagement discussions and gauge interest in working with PacifiCorp in forming resilience hubs to help reduce the vulnerability of the communities to long duration power outages. Additionally, PacifiCorp has established relationships with community and public safety partners to identify sites where the company may activate a Community Resource Center to provide services to communities during a public safety power shutoff event. Improving outage resilience through grants in vulnerable populations will reduce community vulnerability to outages in the areas they reside and communities within proximity.

The DSP has done the analysis in Oregon and will be working to implement the same technology and analysis in Washington to define vulnerable highly impacted communities. The 2024 Washington DSP engagement plan includes the upcoming CEIP meeting on October 29, 2024 at 9am via Zoom where the team will review how they plan to implement feedback from community engagement, plans for advancement in Washington, plans to interact with other Washington initiatives, and resources not owned or controlled by PacifiCorp.

Public Comment

There was no public comment