

PacifiCorp - Stakeholder Feedback Form

2017 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2017 IRP, including, but not limited to the process, assumptions, and analysis. In providing your feedback, PacifiCorp requests that the stakeholders identify whether they are okay with the Company posting their comments on the IRP website.

Yes No May we post these comments to the IRP webpage? Date of Submittal 11/4/2016
*Name: Mitalee Gupta Title: Program and Policy Associate
*E-mail: mgupta@utahcleanenergy.org Phone: 801-363-4046
*Organization: Utah Clean Energy
Address: 1014 2nd Avenue
City: Salt Lake City State: Utah Zip: 84103
Public Meeting Date comments address: 9/22/2016 Check here if not related to specific meeting
List additional organization attendees at cited meeting: [Click here to enter text.](#)

***IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Utah Clean Energy hereby submits comments on PacifiCorp's Supply Side Resource Tables and Capacity Contribution Study.

Check here if any of the following information being submitted is copyrighted or confidential.

***Respondent Comment:** Please provide your feedback for each IRP topic listed above.

Utah Clean Energy appreciates the opportunity to provide comments on PacifiCorp's Supply Side Resource Tables and Capacity Contribution Study.

Supply Side Resources Tables

This a follow up to Utah Clean Energy's comments on the Supply Side Resource Tables submitted to PacifiCorp on September 15, 2016. In its resource planning process, PacifiCorp traditionally models supply-side resources using its best estimates for cost and performance inputs. Based on our discussion with PacifiCorp, we recently learned that the Company only looks at utility ownership of different supply side resources. This is perhaps one of the primary reasons why the cost of these resources is higher than the actual costs of projects that are being built.

Over the 20-year planning horizon the cost of new resources in the supply-side resource table are theoretically assumed to approximate procurement costs regardless of ownership structure. The Company will procure all the supply-side resources included in the preferred portfolio within a stipulated time frame as determined under a resource procurement action item, including, potentially, from independent power producers. However, if the Company persists in modeling costs that are too high, the model will not select new renewable resources for portfolios, and there will be no action items calling for their acquisition, and no RFP will be issued for renewables at any price. While the Company may ostensibly be agnostic toward resource ownership, its modeling of renewable resources is a kind of self-fulfilling

* Required fields

prophesy: the model is unlikely to select any renewable resources at the prices the Company chooses. The Company has essentially told its planning models that renewable resources are unviable, even though, in reality, the opposite is true.

Utah Clean Energy recommends the Company revise its costs assumptions such that they are more in line with actual PPA pricing. This will facilitate the selection of a more diverse portfolio of resources based on much more accurate costs and result in planning that is actually aligned with the objective of being least-risk and least-cost.

Capacity Contribution Study

The Commission's Order in Docket 14-035-140 stated that "PacifiCorp shall update wind and solar capacity contribution values as necessary, consistent with our Phase II Avoided Cost Order, and at least as often as it files its biennial IRP. Those values shall be calculated into Schedule 38 capacity payments following review and approval."

Utah Clean Energy requests that PacifiCorp provide us the underlying data behind all the 500-iterations of hourly PaR run that have been used as a basis for Loss of Load Probability and Capacity Contribution Study in the 2017 IRP.

Link to the Order: <http://psc.utah.gov/utilities/electric/elecindx/2014/documents/26715514035140oaccsacmv.pdf>

Data Support: If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

The data sources have been cited above.

Recommendations: Provide any additional recommendations if not included above - specificity is greatly appreciated.

Kindly see above.

Thank you for participating.