

# 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.

<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	May we post these comments to the IRP webpage?	Date of Submittal	2/21/2017
*Name:	<u>Nancy Esteb</u>	Title:	<u>Consultant</u>
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*Organization:	<u>Renewable Energy Coalition</u>		
Address:	<u>Click here to enter text.</u>		
City:	<u>Click here to enter text.</u>	State:	<u>Click here to enter text.</u>
		Zip:	<u>Click here to enter text.</u>
Public Meeting Date comments address:	<u>Click here to enter date.</u>	<input checked="" type="checkbox"/> Check here if not related to specific meeting	
List additional organization attendees at cited meeting:	<u>Click here to enter text.</u>		

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

QF contract assumptions  
OR PUC order  
FOT sensitivity limits  
OFPC, high gas curve

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.

These comments from the Renewable Energy Coalition are offered to facilitate the smoother review of the IRP once it is filed. The Coalition was pleased that the Company included the winter peak in their FOT availability analysis. This was a point we raised in our earlier comments on the IRP website.

We asked, at an IRP stakeholder meeting, about the Company's assumption regarding the renewal of QF contracts. In all past IRPs, including the last IRP (LC 62) PacifiCorp assumed that all small existing QF contracts renew and stay in the existing resource stack. PacifiCorp has changed their assumption in this 2017 IRP, and is now assuming that they do not renew. This runs counter to the experience of our 30+ QF members, the vast majority of whom have renewed their contracts upon expiration. Therefore, we wonder why this change was made. The Oregon PUC has required the Company to analyze this issue in terms of estimating the capacity value if existing QFs renew their contracts. The acknowledgment order states "We agree with Staff and the Joint QFs that a certain amount of capacity may not be valued if utilities assume in their IRPs that existing QFs nearing contract expiration will automatically renew. We direct each utility to work with parties to address this issue in its next IRP."

Please provide a list of all PacifiCorp's QFs over the past thirty years, including but not limited to resource type, size, location, and whether each specific QF renewed a contract with PacifiCorp. For each QF that did not renew its contract with PacifiCorp, please explain the reason for the non-renewal and whether the QF renewed at a later time.

\* Required fields

Please explain what changes in circumstances warrant a change in the assumption regarding whether existing QFs renew their contracts.

Please explain what actions PacifiCorp is taking to comply with the Oregon PUC's order to work with the parties to more accurately calculate the capacity value provided by existing QFs.

The Coalition continues to question the company's assumption of the continued health of the wholesale market, and its reliance on it through the next 20 years. The FOT sensitivity conducted by the Company and discussed at the January 26-27 stakeholder meeting projects only a small decrease in FOTs and the pricing of FOTs does not change. A more realistic sensitivity would change the availability of FOTs to a larger degree and increase the pricing of the wholesale market.

Regarding the gas price assumption used in this IRP, the Coalition believes the Company's base gas price assumption is much too low. We recognize that natural gas prices historically have been highly unpredictable and are likely to remain so for some time. We know that Idaho Power uses the EIA gas price forecast, which is considerably higher than the Company's expert #2. Why did the company accept expert #2 instead of EIA's gas forecast?

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**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.

[Click here to enter text.](#)

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

[Click here to enter text.](#)

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Thank you for participating.