

PacifiCorp - Stakeholder Feedback Form

2019 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 2019 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

Date of Submittal 8/24/2018

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*Organization: Western Resource Advocates

Address: 150 South 600 East, Suite 2A

City: Salt Lake City

State: UT

Zip: 84102

Public Meeting Date comments address: 6/1/2018

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Renewable Northwest, Powder River Basin Resource Council,
Sierra Club, HEAL Utah, Northwest Energy Coalition

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

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.

Request for additional retirement analysis:

In PacifiCorp's June public input meeting, the Company committed to use the results of the coal unit economic analysis to prioritize additional early retirements in the 2019 IRP. Specifically, PacifiCorp committed to develop "stacked" early retirement scenarios in SO and PaR. Western Resource Advocates, Renewable Northwest, Powder River Basin Resource Council, Sierra Club, HEAL Utah, and Northwest Energy Coalition support this approach and recommend that the Company conduct the following analysis:

- For each unit determined to be non-economic in PacifiCorp's June Coal Study, determine the least cost year for retirement between 2022 and 2030, assuming optimal one-off replacement. Sequencing any such units from the least economic on a \$/kW basis to the most economic, add one additional unit to a retirement schedule until it is no longer economic to add additional incremental retirements. Report the results of that run, as well as the next incremental retirement run.

PacifiCorp Response:

PacifiCorp plans to model a portfolio that addresses this requested scenario. The structure of this and other proposed portfolios was presented and discussed with stakeholder feedback at the September 27-28, 2018 Integrated Resource Plan (IRP) public input meeting.

To the extent the foregoing analysis does not retire at least 1100 MW of additional coal by 2030 beyond retirements identified in the 2017 IRP, please run a scenario with the following parameters:

- Assume PacifiCorp is required to retire an additional 1100-1500 MW of coal capacity by 2030 (beyond the 2017 IRP retirements).
- Assume PacifiCorp is able to recover existing investments consistent with its current depreciation schedule.

* Required fields

- Further, assume PacifiCorp is able to fund decommissioning and reclamation accounts consistent with its current depreciation schedule.
- Please identify how PacifiCorp would comply with the requirement in a manner that minimizes costs to customers. Which units would be retired in which years?

PacifiCorp Response:

PacifiCorp plans to model a portfolio that addresses this requested scenario. The structure of this and other proposed portfolios was presented and discussed with stakeholder feedback at the September 27-28, 2018 IRP public input meeting.

For the foregoing analyses, please isolate the impact of the intra-hour dispatch credit and explain how the results would be different with and without the dispatch credit.

PacifiCorp Response:

Based on Stakeholder feedback, PacifiCorp intends to calculate model present value revenue requirement results with and without intra-hour flexible resource credits. PacifiCorp will not incorporate the credits in its model, such that they will not affect portfolio development. This topic was discussed further at the October 2018 IRP public input meeting.

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.

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

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- Check here if you do **not** want your Stakeholder feedback and accompanying materials posted to the IRP website.

Thank you for participating.