

# 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 8/30/2018

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Title: Sr. Renewable Analyst

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Phone: 503-551-0531

\*Organization: Oregon Public Utility Commission

Address: 201 High Street Suite 100

City: Salem

State: Oregon

Zip: 97301

Public Meeting Date comments address: [Click here to enter date.](#)  Check here if not related to specific meeting

List additional organization attendees at cited meeting: [Click here to enter text.](#)

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**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.  
2019 IRP filing date

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

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

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

Public Utility Commission of Oregon Staff (Staff) appreciates the Company's efforts to be transparent and provide more information, earlier on in the 2019 IRP process. That said, Staff finds that further clarity and additional information are required to meaningfully participate in this process.

First, Staff needs to better understand the Company's approach to scheduling the IRP process. It would be very helpful for the Company to outline the drivers that led PacifiCorp to set the 2019 IRP Filing date of April 1, 2019. Staff recognizes that there is a six-state landscape of requirements for the planning process and requests that the Company explain the timing considerations for each state and how that landscape resulted in the current April 1, 2019 filing date. According to OAR 860-027-0400(3) energy utilities are required to file an IRP within two years of its previous IRP acknowledgement order. As the acknowledgement order for PacifiCorp's 2017 IRP has a date of April 2018, the Company's 2019 IRP is not due until April of 2020. This expedited schedule raises concerns about the Company's ability to meaningfully address considerations for the 2019 IRP, such as the Oregon PUC's requirements for coal unit retirement study, before the Company's model runs are locked in. In an effort to fully understand and meaningfully contribute to the maturation of the coal dispatch credit methodology as it applies to the coal retirement study, there is currently a considerable amount of dialogue between the Company, Staff and stakeholders. The Company's condensed 2019 IRP timeline may not allow for a proper feedback loop with Staff and stakeholders. It appears that PacifiCorp may be rushing through this process, and Staff would like to better understand why.

\* Required fields

In addition, Staff is concerned that the condensed timeline of the 2019 IRP filing is rushing the process of Staff and Stakeholder communication and feedback. PacifiCorp's short notice of workshop agenda items, timelines and related presentation materials, has made it challenging for Staff to coordinate our participation. For example, the agenda items and timeline for the Thursday, August 30, 2018 and Friday, August 31, 2018 workshops, were posted to the IRP mailbox on the afternoon of Friday, August 24, 2018, less than seven days advance of the workshop. Meeting materials were not made available until the evening of Wednesday, August 29, 2018 at the Company's referenced webpage:

<http://www.pacificorp.com/es/irp/pip.html>. Staff understands that delays in providing workshop details may be related to the Company's tight timeline and uncertainty about who and what will be available to discuss.

We are grateful for the care and effort the PacifiCorp puts into its IRP process. We do continue to experience challenges with the process and would appreciate additional clarity on timing and logistics to facilitate meaningful participation on our end.

**PacifiCorp Response:**

Variables determining PacifiCorp's April 1, 2019 Integrated Resource Plan filing date were discussed at the September 27-28, 2018 public input meeting including requirements to file every two years from the date of filing.

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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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Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.