

# 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 9/21/2018

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Title: Sr. Renewable Analyst

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\*Organization: Oregon Public Utility Commission

Address: 201 High Street Suite 100

City: Salem

State: Oregon

Zip: 97301

Public Meeting Date comments address: 7/27/2018

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.

Intra-hour Credit modeling assumptions

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

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

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

Public Utility Commission of Oregon Staff (Staff) appreciates PacifiCorp's presentation and information related to Intra-hour Credit modeling assumptions provided at the 2019 IRP Public Meetings. Staff offers the following comment requesting further clarity and additional information so as to more meaningfully participate in this process.

PacifiCorp has applied an Intra-hour Dispatch Credit to coal production, in the coal analysis requested by the Oregon PUC, and 'is exploring developing intra-hour dispatch credits for natural gas and energy storage.' If this type of credit will be used in the IRP, then Oregon Staff is interested in learning more about this credit. Specifically, Oregon Staff wants to understand how it is calculated and its quantitative justification at a future Public Input Meeting. Staff notes that the estimated credit seems out of proportion with the actual EIM benefits reported by the company in power cost dockets. Additionally, Staff notes that applying the credit to coal units while not applying a similar credit to gas or hydro in the coal analysis may give coal units an unfair advantage over other generators that also have flexibility benefits. Even if the data underlying the calculation is considered highly confidential by the company, a more in-depth description of the underlying data and the method used to calculate the credit would be beneficial.

\* Required fields

**PacifiCorp Response:**

PacifiCorp provided further description of the Intra-hour Flexible Resource Credit calculation and values by resource type at the September and October 2018 public input meetings. PacifiCorp plans to calculate and present the impact on overall portfolio costs attributed to the Intra-hour Flexible Resource Credit. The Intra-hour Flexible Resource Credit will not be modeled nor impact portfolio selection within System Optimizer.

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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.