

# 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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Address: 201 High Street Suite 100

City: Salem

State: Oregon

Zip: 97301

Public Meeting Date comments address: 8/30/2018

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.

Market Reliance Assessment

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 relating to the Market Reliance Assessment provided at the 2019 IRP Public Meeting held on Aug. 30-31, 2018. Staff offers the following comments requesting further clarity and additional information so as to more meaningfully participate in this process.

1. It would be a helpful analysis to compare prior FOT limit studies. It would also be helpful to compare the planning reserve margin (PRM) studies to the historic actuals available to see how well the predictions are doing.

### **PacifiCorp Response:**

The Planning Reserve Margin (PRM) is a resource planning parameter to ensure adequate resource selection in portfolio development in System Optimizer to reliably meet forecasted load over time. PacifiCorp selects the PRM based on analysis of a number of reliability measures and costs for varying levels of PRM above the minimum amount necessary to meet contingency reserve and operating reserve obligations. There are no direct actuals that would directly compare to this long-term planning assumption.

2. Staff finds that it would be useful to include some sensitivities that include a FOT purchase level closer to actual past purchase levels, especially in the context of potentially economic early coal retirements that will be determined through the coal analysis currently being conducted. PacifiCorp's IRP analysis has generally assumed there is capacity available for purchase from the market whenever it is needed, and has not yet analyzed high purchase scenarios under availability constraints. Staff is interested in seeing how high purchase scenarios would be impacted by a limit on the availability of resources from the market.

\* Required fields

**PacifiCorp Response:**

From a long-term planning perspective, the limit of Front Office Transactions (FOTs) available for selection as a resource is set by the planning limit. Assuming a high Front Office Transaction limit at the same price the model would likely select up to that limit however, PacifiCorp would not support that as a reasonable planning assumption and it would not capture the effects of weather those FOTs were actually available in the market when they would be needed.

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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.