

# 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 9/26/2018

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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.](#)

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

List of data requests; carbon assumptions for 2019 IRP; and requested sensitivities.

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.

-----Data Requests-----

1) Coal Unit Retirement Study:

a. Will the coal unit retirement case study represent a comprehensive, portfolio level analysis of all the system costs and benefits associated with stacked coal unit retirements? If not, please explain how this coal unit retirement study enhances the coal unit analysis presented in June.

### **PacifiCorp Response:**

Yes. This topic was addressed in detail at the September 27-28, 2018 public input meeting.

b. Will coal units found to be uneconomic in PacifiCorp's upcoming coal unit analysis have hardwired retirement dates in the 2019 IRP consistent with the findings of the coal unit analysis?

### **PacifiCorp Response:**

This topic was addressed in detail at the September 27-28, 2018 public input meeting. Results from the coal study will be used to establish specific coal unit retirement assumptions that also consider Regional Haze compliance alternatives, during the portfolio-development phase of the 2019 Integrated Resource Plan (IRP).

c. Will the SO model be allowed to select incremental endogenous coal unit retirements for the 2019

\* Required fields

IRP?

**PacifiCorp Response:**

No. This topic was addressed in detail at the September 27-28, 2018 public input meeting. Due to outcome-dependent changes in assumptions, it is not reasonable to evaluate coal unit retirements using endogenous retirement logic.

2) Intra-Hour Dispatch Credit:

a. In the 2017 IRP, PacifiCorp notes that the intra-hour dispatch credit is applied to the preferred portfolio and the regional haze “coal studies.” See 2017 IRP Update page 67. Please provide a detailed description of how the intra-hour dispatch credit is applied to the preferred portfolio and the regional haze cases, including equations and work papers as applicable.

**PacifiCorp Response:**

Please refer to the September and October 2018 public input meeting materials. The Intra-Hour Flexible Dispatch Credit portfolio cost impacts will be provided on an informational basis as part of portfolio results.

i. Please provide a detailed description of how the intra-hour dispatch credit is applied to any other component of the IRP, including equations and work papers as applicable.

**PacifiCorp Response:**

Please refer to the September and October 2018 public input meeting materials. The Intra-Hour Flexible Dispatch Credit portfolio cost impacts will be provided on an informational basis as part of portfolio results.

3) Science of Climate Change:

a. How has PacifiCorp incorporated the science of climate change into the IRP process? Specifically, what scientific research on climate change has PacifiCorp reviewed and how has this research affected PacifiCorp’s timeline for decarbonizing its energy mix?

**PacifiCorp Response:**

Please refer to the September and October 2018 public input meeting materials.

-----Carbon Assumptions-----

1) Coal Unit Retirement Study:

a. For the coal unit retirement analysis in the 2019 IRP, please evaluate retirement runs using three different carbon cost assumptions (low, medium and high) in addition to a zero cost scenario. The three cost assumptions should be as follows:

- Low: Equal to or greater than the medium cost scenario from the 2017 IRP update;
- Medium: Equal to or greater than the high cost scenario from the 2017 IRP update;
- High: In line with the Social Cost of Carbon (SCC) as revised by the EPA in 2016, found at [https://19january2017snapshot.epa.gov/climatechange/social-cost-carbon\\_.html](https://19january2017snapshot.epa.gov/climatechange/social-cost-carbon_.html). Specifically, use the 3% Average Discount Rate (please note that these figures are in 2007 dollars--they will need to be adjusted.) To accommodate other parties who desire higher carbon pricing, Utah Clean Energy is happy to work with PacifiCorp and other parties to fine tune this request.

**PacifiCorp Response:**

This topic was addressed in detail at the October 2018 public input meeting. PacifiCorp plans to conduct its next phase of coal studies under three different price policy scenarios that include low gas-no CO<sub>2</sub>, medium gas-medium CO<sub>2</sub>, and high gas-high CO<sub>2</sub>.

2) Carbon Assumption Inputs to Case Study Fact Sheets:

a. In order to ensure that the preferred portfolio adequately reflects carbon risk, please model an equal combination of medium and high CO<sub>2</sub> prices (as defined in Carbon Assumptions number 1 above) in the Core Cases.

**PacifiCorp Response:**

See PacifiCorp response to Carbon Assumptions 1)a.

\* Required fields

-----Sensitivities-----

1) Private Generation:

- a. Please perform a sensitivity showing the effect that the high, medium, and low private generation penetration scenarios have on the resource mix and the PVRR(d).

**PacifiCorp Response:**

Consistent with the 2017 Integrated Resource Plan, PacifiCorp will conduct a high and low private generation sensitivity. The base case private generation assumption is included in PacifiCorp's base case load forecast.

2) Assumed Incremental Coal Unit Retirements:

- a. Please perform a sensitivity that assumes PacifiCorp will retire incremental coal units equaling a minimum of 1500 MW by 2030, and a sensitivity that assumes PacifiCorp will retire incremental coal units equaling a minimum of 2000 MW by 2030. For purposes of both sensitivities, please retire the coal units that will minimize the impact on the system and that are not currently scheduled to retire in, or by 2030 according to the current depreciation schedule, or the proposed depreciation schedule in Utah docket 18-035-36.

**PacifiCorp Response:**

Please refer to the September 27-28 public input meeting materials. PacifiCorp plans to study a portfolio with all coal units retired by 2030, see portfolio Case P-12.

3) DSM Target:

- a. Please work with parties to develop a sensitivity analysis that evaluates the impact on the portfolio and PVRR where at least 1.5% of Rocky Mountain Power's total annual retail sales in Utah are met with DSM. For reference, a similar analysis was performed in the 2013 IRP process.

**PacifiCorp Response:**

PacifiCorp will consider this request balanced with other stakeholder requests and time constraints.

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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.

\* Required fields