

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 10/17/2018

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Address: 201 High Street Suite 100

City: Salem

State: Oregon

Zip: 97301

Public Meeting Date comments address: 9/27/2018

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.
Planning Reserve Margin

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 Planning Reserve Margin presentation provided at the 2019 IRP Public Meeting held on Sept. 27-28, 2018. Staff offers the following comments requesting further clarity and additional information so as to more meaningfully participate in this process.

1. PacifiCorp's decision of planning reserve margin (PRM) is concerning to Oregon Staff, as it has not been sufficiently justified why minimum reserve levels are insufficient. There will always be a trade-off in the choice of the PRM: accept more risk for lower cost, or pay more for certainty. PacifiCorp choice of 13%, which on slide 82 it states that minimum requirements are somewhere between 11-12%, suggests that those minimum requirements are insufficient. To ensure that PacifiCorp is not overbuilding their system, Oregon Staff will look for a more developed explanation that what was presented at the September PIM in the IRP once filed as to why 13% adequately balances cost and risk.

PacifiCorp Response:

PacifiCorp will describe the selection of the 13% planning reserve margin in its 2019 Integrated Resource Plan (IRP).

* Required fields

2. Relating to slide 86, although it was discussed to a degree during the workshop, Staff would appreciate a more detailed explanation for the non-intuitive value increase of the loss of load hour (LOLH) between the PRM of 11% and 12%.

PacifiCorp Response:

System Optimizer (SO) portfolio variations explain the relatively high loss of load hour (LOLH) in the 12 percent planning and reserve margin (PRM) study. For example, the 12 percent PRM portfolio favors higher demand-side management (DSM) in year 2028, as compared to the selection of a single cycle gas unit in that same year in the 13 percent PRM portfolio. The DSM is more cost-effective in meeting peak-capacity in SO, but does not contribute as effectively to reliability in the Planning and Risk (PaR) model, which has visibility into stochastics as well as non-peak energy needs.

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.](#)

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

[Click here to enter text.](#)

Please submit your completed Stakeholder Feedback Form via email to IRP@PacifiCorp.com

Thank you for participating.