

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	3/22/2019
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*Organization: <u>Utah Clean Energy</u>		
Address: <u>1014 East Second Avenue</u>		
City: <u>Salt Lake City</u>	State: <u>UT</u>	Zip: <u>84105</u>
Public Meeting Date comments address: <u>Click here to enter date.</u>	<input checked="" type="checkbox"/> Check here if not related to specific meeting	
List additional organization attendees at cited meeting:	<u>Navigant</u>	

***IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.
Navigant 2018 Private Generation Long-Term Resource Assessment (2019 - 2038)

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.

Navigant's 2018 Private Generation Long-Term Resource Assessment provides base, low, and high forecasts for solar adoption in PacifiCorp's six states. In the case of Utah, the "base" and "high" case forecasts are identical in 2019 and 2020, and in 2019 both the "base" and "high" case appear to forecast lower levels of solar adoption than the "low" case. Please explain the modeling output and rationale for (1) a "base" and "high" case that are identical in the first two years of the forecast, and (2) a "low" case that is higher than the "base" and "high" case in the first year of the forecast.

PacifiCorp Response:

1) As discussed on Page 32 of the Navigant report, the base and high cases were manually adjusted to assume that all available capacity for the Schedule 136 transition program was used by the end of 2020. This assumption reflects PacifiCorp's expectation that Schedule 136 will be fully subscribed which is why the base and high cases are identical.

2) The low case is higher than the base and the high case in the first year of the forecast because it does not assume Schedule 136 is fully subscribed. Rather, the low case relied on direct outputs from Navigant's economic model for 2019 and 2020. Due to the decrease in tax incentives in 2020, Navigant's economic model predicts a higher level of residential solar interconnections in 2019 than assumed in the fully subscribed Schedule 136 assumption, however, the total for the period 2019-2020 is significantly lower than the base case and high case for the same two-year period. A comparison of the 2019-2020 period for the three scenarios is provided in the table below:

* Required fields

Utah Estimate	2019 MW- AC	2020 MW-AC	Total 2019-2020 MW-AC	Primary Driver
High Case	34	85	119	Assumption of all Schedule 136 capacity being installed over 2019 and 2020; Does not rely on Navigant economic modeling for residential PV installations.
Base Case	34	85	119	Assumption of all Schedule 136 capacity being installed over 2019 and 2020; Does not rely on Navigant economic modeling for residential PV installations.
Low Case	41	3	44	Navigant economic model used to establish residential solar installation models, reduction in 2020 primarily based on the Reduction in the Federal ITC.

Additionally, the supporting tables contain several numbers that appear to be negative. For example, see Table 28, Residential PV in 2026 (-4264 MWh) and Table 30, Residential PV in 2026 (-3473 MWh). Please explain the rationale for negative numbers in the output of this forecast, or, if the negative numbers are a typo, whether this error impacted any of the modeling or conclusions from this analysis.

PacifiCorp Response:

The negative values are typos and only affect the low case. A corrected version of the document will be posted by May 1, 2019. The corrected values for the low case will be used when running the low private generation sensitivity.

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

* Required fields

Thank you for participating.

* Required fields