

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 4/24/2019

*Name: Thomas Familia

Title: Sr. Renewable Analyst

*E-mail: thomasfamilia@state.or.us

Phone: 503-551-0531

*Organization: Oregon Public Utility Commission

Address: 201 High Street Suite 100

City: Salem

State: Oregon

Zip: 97301

Public Meeting Date comments address: 3/21/2019

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.

[Click here to enter text.](#)

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.

Transmission

PacifiCorp has explained that its models account for existing transmission rights with optionality to select transmission upgrades, with associated costs, as needed to facilitate the optimized combination of resources to meet customer load requirements over the twenty-year study period. Models also take into account brownfield locations and the option to locate replacement resources at these locations.¹

Question 1: Please provide the current list of optional transmission upgrades, with the dates those upgrades are available for the model to choose. Please indicate whether this information has changed since the September 2018 IRP presentation.

PacifiCorp Response:

1. The information has not changed, please refer to the information provided in response to the Oregon Public Utilities Commission (OPUC) staff stakeholder feedback form dated 11/27/2018, with topic Modeling

¹ Please see PacifiCorp's response to Question 18 of the City of Kemmerer feedback form at http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2019_IRP/Comment_Responses/PacifiCorp_Response_2019_IRP_Feedback_Form_Kemmerer_Coal_Analysis_0_1-16.pdf

* Required fields

Improvements and Updates.

Question 2: Please explain what supply-side resources are typically associated with each transmission upgrade listed.

PacifiCorp Response:

2. Transmission upgrades are not restricted by specific resource types. In optimizing the least cost, least risk portfolio, the model may determine a transmission upgrade is necessary to facilitate adding an expansion resource at a specific location. All resources in the supply-side resource table are eligible for that selection.

Question 3: Can PacifiCorp provide a list of the supply-side resources at brownfield locations, describing the size available to the model and the price?

PacifiCorp Response:

3. Brownfield sites are listed under natural gas supply side resource options on PacifiCorp's November 1, 2018 Supply Side Resource Table located at: www.pacificorp.com/es/irp/pip.html. In addition to natural gas, brownfield sites listed can be developed with wind and solar resources.

PacifiCorp has stated that its public-input meeting process reflects preliminary analysis that will inform scenarios during the portfolio-development phase in the IRP. The portfolio-development phase of the IRP will consider additional planning variables, including regional haze compliance, market price and carbon dioxide (CO₂) policy uncertainties, timing of Energy Gateway transmission projects, and demand-side management scenarios.²

Question 4: Please describe how the timing of Energy Gateway transmission projects are an additional planning variable. Are those dates separate from the dates associated with the identified transmission upgrades in the model?

PacifiCorp Response:

4. PacifiCorp plans to study the portfolios with different in service timings for different combinations of Energy Gateway transmission projects as part of the portfolio development process. Please see the 2019 Portfolio Development Matrix discussed at the September 28, 2018 public input meeting: www.pacificorp.com/es/irp/pip.html specifically, cases P22-P25.

During discussion of page 21 of the March public input presentation a stakeholder mentioned that Wyoming has a power point on transmission planning.

Question 5: It's unclear whether that was a PacifiCorp presentation, or a Wyoming Commission presentation. If PacifiCorp has a PowerPoint on presentation on transmission planning, please send it to us.

PacifiCorp Response:

5. PacifiCorp has videos and presentations on transmission available online from the OPUC transmission workshops at: www.puc.state.or.us/Pages/electric_gas/OPUC-Transmission-Workshops.aspx including overview information similar to the presentation provided to the Wyoming commission that will also be provided as an attachment to the response email.

During discussion of page 21 of the March public input presentation PacifiCorp described its large generator interconnection queue for interconnection, and described FERC's "obligation to build".

² Please see PacifiCorp's response to Question 1 of the City of Kemmerer feedback form at http://www.pacificorp.com/content/dam/pacificorp/doc/Energy_Sources/Integrated_Resource_Plan/2019_IRP/Comment_Responses/PacifiCorp_Response_2019_IRP_Feedback_Form_Kemmerer_Coal_Analysis_0_1-16.pdf

Question 6: With “obligation to build” is PacifiCorp referencing FERC’s pro forma tariff sections 13.5 and 15.4?

PacifiCorp Response:

6. As PacifiCorp noted during the March public meeting, whether a utility is under a federal obligation to construct transmission facilities is a circumstance-specific determination, and PacifiCorp is still in the process of evaluating whether it is under any such obligation. Generally speaking, however, an obligation to construct transmission facilities can stem from a Federal Energy Regulatory Commission (FERC)-jurisdictional request to interconnect with a transmission provider’s system or a FERC-jurisdictional request to arrange transmission service across a transmission provider’s system. The above-referenced open access transmission tariff (OATT) sections (and FERC’s precedent creating and interpreting those provisions) do relate to constructing upgrades in response to one type of transmission service (point-to-point transmission service). There are other types of transmission service that could also trigger an obligation to construct, such as network transmission service, which is covered by, for example, OATT section 28 and FERC’s precedent creating and interpreting those provisions. With respect to FERC-jurisdictional interconnection service, Part IV of PacifiCorp’s OATT (starting with section 36) and the FERC precedent creating and interpreting those provisions identifies a study process by which PacifiCorp must identify what network upgrades, if any, are necessary to grant a request for generator interconnection service. Requests for transmission service are submitted and studied separately from requests for interconnection service, but both types of requests are studied in serial-queue order and assume requests with higher-queue positions and their associated network upgrade requirements are in-service as a baseline starting point for the study.

Question 7: Is PacifiCorp aware of any precedent on “obligation to build” other than FERC Order 890-A, 890-B and a brief mention in Order 1000?

PacifiCorp Response:

7. Please see PacifiCorp’s response to question 6, noting that the relevant FERC precedent on a utility’s obligation to build includes FERC orders originally creating the referenced OATT sections, which: (1) with respect to transmission service, generally have their origin in FERC’s 1992 transmission pricing policy (see FERC docket RM93-19) and FERC’s 1996 Order No. 888 that created the pro forma OATT, as subsequently interpreted and modified in other FERC orders, including the above-referenced Order No. 890 proceeding; and (2) with respect to interconnection service, generally have their origin in FERC’s Order Nos. 2003 and 2006 proceedings establishing standard processes and agreements for large and small generator interconnections, as subsequently interpreted and modified in other FERC orders.

In OPUC Docket No. UM 1845, the Independent Evaluator for Oregon explained that when PacifiCorp did transmission restudies for EV 2020, interconnection queue position Q0713 triggers the need for Gateway South.³

Question 8: Have any new restudies been completed?

PacifiCorp Response:

8. Several interconnection requests with queue positions after Q0713 have been restudied. No new restudies of Q0713 or interconnection requests with queue positions before Q0713 have been restudied.

Question 9: With EV 2020 moving forward, is it still interconnection customer Q0713 that triggers the need for Gateway South?

PacifiCorp Response:

9. Yes.

³ Please see relevant document at:

<https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAH&FileName=um1845hah16913.pdf&DocketID=20808&numSequence=110>

* Required fields

Question 10: Has the company evaluated its options for contracting with resources in the queue? If PacifiCorp does not want to purchase the first resource in the queue, can PacifiCorp let that resource contract with another buyer, while PacifiCorp contracts with a lower-queued project? Would this be more feasible without the short deadline for full PTC realization that was a theme of EV 2020, or does PacifiCorp view this a queue hopping?

PacifiCorp Response:

10. PacifiCorp’s merchant function (or any other potential purchaser of a generator’s output) can consider contracting with any generator regardless of its interconnection queue position, but that commercial consideration will need to take into account the generator’s interconnection requirements as they are separately evaluated and identified in the generator’s interconnection studies produced by PacifiCorp’s transmission function—interconnection requirements that are unaffected by whether a potential buyer (PacifiCorp’s merchant function or a third-party purchaser) is considering, or even contracts with, the project. Stated another way, absent FERC approval, a generator interconnection customer with a lower queue position cannot “jump” a generator interconnection customer with a higher queue position simply because the generator with a lower queue position secured a power purchase agreement.

In UM 1845 the IE found that PacifiCorp’s RFP got out ahead of PAC’s IRP and transmission planning, and that if a plan is identified earlier, the IRP, transmission planning, and resource acquisition can work together better.⁴

Question 11: Please describe PacifiCorp’s planned sequence of actions as they relate to Gateway South. Will PacifiCorp complete its 2019 IRP and accelerate Gateway South only if IRP modeling shows it is part of a least-cost, least-risk resource addition to serve PacifiCorp’s native load?

PacifiCorp Response:

11. Please refer to PacifiCorp’s response to question 4 above. As indicated in April public input meeting, PacifiCorp plans to study transmission portfolios, and it is not known at this time if least cost, least risk portfolio will show a benefit to Gateway South.

Question 12: Alternatively, is PacifiCorp considering accelerating Gateway South as a customer-driven (economic) line?

PacifiCorp Response:

12. Please refer to PacifiCorp’s response to questions 4 and 11 above.

Question 13: If it is a customer-driven line, does PacifiCorp’s Attachment K transmission classify Gateway South as a line for native load, for one of PacifiCorp’s other network customers, or for a firm point to point customer?

PacifiCorp Response:

13. PacifiCorp’s Attachment K addresses all of these types of transmission drivers, among others. For example, an excerpt from PacifiCorp’s Attachment K is pasted below:

Section 1.26 of PacifiCorp’s Attachment K defines TSP as the Transmission Provider’s transmission plan that identifies the upgrades and other investments to the Transmission System and Demand Resources necessary to reliably satisfy, over the planning horizon, Network Customers’ resource and load growth expectations for designated Network Load and Network Resource additions; Transmission Provider’s resource and load growth expectations for Native Load Customers; Transmission Provider’s transmission obligation for Public Policy

⁴ Please see relevant document at:

<https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAH&FileName=um1845hah16913.pdf&DocketID=20808&numSequence=110>

Requirements; Transmission Provider's obligations pursuant to grandfathered, non-OATT agreements; and Transmission Provider's Point-to-Point Transmission Service Customers' projected service needs including obligations for rollover rights.

Question 14: Does PacifiCorp's Attachment K transmission plan indicate that Gateway South may be accelerated to 2024?

PacifiCorp Response:

14. PacifiCorp's Attachment K already identifies Gateway South with a date range of 2020 to 2024 in-service.

Question 15: Please provide links to the most recent Attachment K documents related to Gateway South.

PacifiCorp Response:

15. <https://www.oasis.oati.com/ppw/index.html>

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.