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 5/31/2019

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Public Meeting Date comments address: ☒ Check here if not related to specific meeting

List additional organization attendees at cited meeting: Hunter Holman and Sarah Wright, Utah Clean Energy

***IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.
2019 Conservation Potential 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.

When reviewing the level of DSM being considered in the 2019 IRP planning process, one way to gauge the reasonableness of the estimated amount of Technical Achievable Potential of DSM is to compare the average annual amount of estimated potential DSM to the level of DSM actually achieved by PacifiCorp. The actual amount of DSM achieved by PacifiCorp in Utah in recent years is an important comparison that can serve as a "reality check" to gauge the estimated potential of DSM against the level of energy savings that has been implemented by the utility in the real world.

The 2019 Conservation Potential Assessment (CPA) estimates that there is 9,619,204 MWh (at generator) of cumulative Achievable Technical Potential in 2038 across the PacifiCorp system.[1] On an average annual basis (the total potential divided evenly over 20 years), this translates to 480,960 MWh per year system-wide. In Utah this equates to 302,047 MWh in of Class 2 DSM per year. We note that cost of DSM is not evaluated in the estimate of Achievable Technical Potential.

[1] PacifiCorp Conservation Potential Assessment for 2019-2038, Volume 2: Class 2 DM Analysis, *Table 3-1 Cumulative Class 2 DSM Potential by Sector in 2038 (page* 27) and *Table 3-2 Cumulative Class 2 DSM Potential by State in 2038* (page 28)

* Required fields

The level of Technical Achievable Potential DSM estimated in the CPA in Utah is less than the level of Class 2 DSM that Rocky Mountain Power has actually achieved in Utah from 2015-2017, which ranges from 311,065 to 372,945 MWh per year, according to Rocky Mountain Power's annual DSM reports (also reported as "at generator" figures). The total portfolio benefit/cost ratio of the energy efficiency achieved during these three years are reported as 1.95 (2015), 2.67 (2016), and 2.86 (2017) using the utility cost, as reported in Rocky Mountain Power's annual DSM reports.

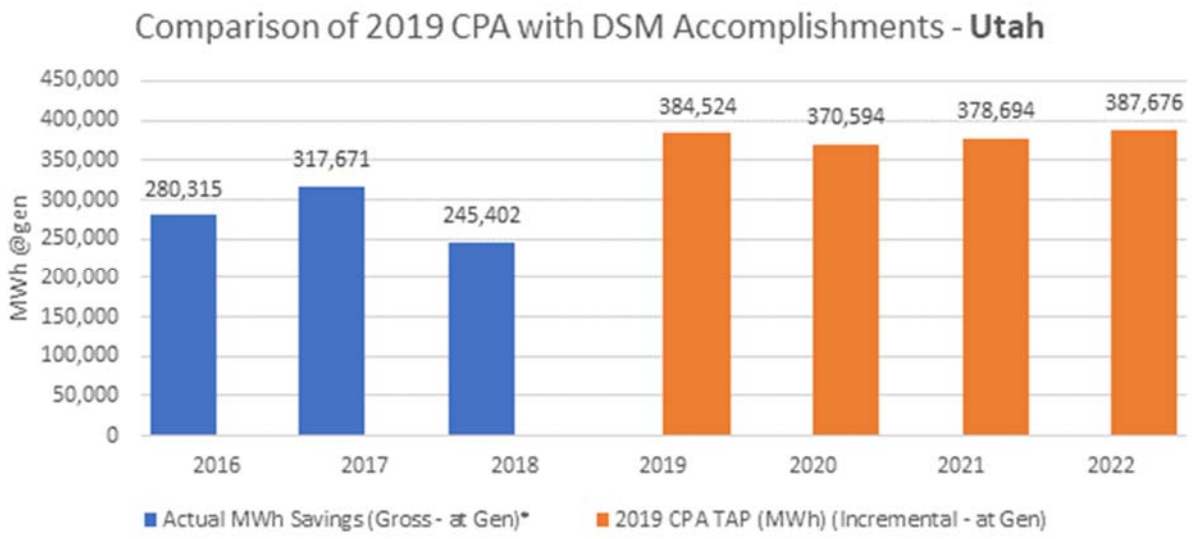
The fact that the CPA identifies an amount of Achievable Technical Potential that is significantly lower on an average annual basis than what has actually been implemented in recent years is concerning and shows that the CPA estimates unreasonably low levels of Class 2 DSM.

Request 1: Please provide a detailed narrative explanation about why the Technical Achievable Potential per year is lower than the amount of Class 2 DSM that has been achieved anually in Utah in recent years.

PacifiCorp Response:

As illustrated in the graph below, the 2019 Conservation Potential Assessment (CPA) Technical Achievable Potential (TAP) for Utah is not lower but higher than the program actual achievements in Utah. The graph below compares PacifiCorp's first-year actual gross savings gigawatt hours (GWh) at generation from 2016 through 2018 to the 2019 CPA Technical Achievable Potential from 2019 through 2022.

*Comparison of 2019 CPA Potential Estimates with DSM Accomplishments w/o HERs - **Utah***



*Reported values refer to "Actual (Gross – at Gen)" values. Incremental savings from Home Energy Reports (HER) have been removed from this comparison since there is no incremental HER potential in the CPA for Utah.

Request 2: Please provide a table that illustrates the estimated Achievable Technical Potential for each year in the 20-year time horizon of the CPA broken out by state and system-wide.

* Required fields

PacifiCorp Response:

2019 CPA - Incremental Technical Achievable Potential (MWh)

Year	CA	OR	WA	ID	UT	WY	2019 CPA
2019	13,948	263,732	73,817	29,315	384,524	85,186	850,523
2020	13,484	245,927	70,161	28,596	370,594	86,624	815,386
2021	13,463	247,436	72,533	29,858	378,694	93,730	835,715
2022	14,029	240,994	75,031	31,526	387,676	102,263	851,519
2023	14,765	226,841	78,845	33,588	401,683	112,368	868,089
2024	14,630	223,337	78,126	33,652	394,453	118,003	862,201
2025	14,233	207,628	75,562	33,327	388,735	118,959	838,444
2026	13,781	200,550	72,486	32,753	377,304	119,655	816,528
2027	13,179	189,880	68,553	31,813	361,891	118,247	783,562
2028	12,468	181,119	64,481	30,670	347,147	112,845	748,730
2029	11,375	162,296	57,949	28,365	319,931	102,872	682,787
2030	10,406	152,718	53,553	26,694	307,190	96,055	646,615
2031	9,454	147,001	48,724	24,969	286,432	85,265	601,844
2032	8,468	141,978	44,405	23,512	270,665	78,177	567,205
2033	7,720	126,486	41,361	22,176	260,613	72,333	530,689
2034	6,131	127,540	32,754	18,520	203,131	58,077	446,152
2035	6,097	121,613	31,187	17,127	183,120	53,818	412,961
2036	5,237	122,737	26,318	14,776	151,046	48,547	368,661
2037	4,565	109,234	22,906	13,196	131,623	37,993	319,516
2038	4,064	105,281	21,876	12,716	134,480	37,986	316,403
Total	**211,495**	**3,544,327**	**1,110,628**	**517,148**	**6,040,931**	**1,739,002**	**13,163,531**

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.

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

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

Thank you for participating.

* Required fields