

# 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 9/4/2018

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\*Organization: Utah Clean Energy

Address: [Click here to enter text.](#)

City: [Click here to enter text.](#)

State: [Click here to enter text.](#)

Zip: [Click here to enter text.](#)

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.](#)

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

Intra-Hour Dispatch Credit

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Check here if any of the following information being submitted is copyrighted or confidential.

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Check here if you do **not** want your Stakeholder feedback and accompanying materials posted to the IRP website.

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**\*Respondent Comment:** Please provide your feedback for each IRP topic listed above.

Utah Clean Energy appreciates the opportunity to participate in the 2019 IRP stakeholder process. The comments below focus on the intra-hour dispatch credit (the "Credit") that PacifiCorp introduced in the 2017 IRP Update. Utah Clean Energy is concerned that PacifiCorp is not planning to apply the Credit in the 2019 IRP in a way that enables a review of all potential supply-side resources on a consistent and comparable basis, as required by the Utah IRP guidelines.

PacifiCorp has thus far provided limited information related to the Credit. As mentioned above, the Credit first appeared in the 2017 IRP Update with a brief description of the following: PacifiCorp's rationale for the Credit, the formula for determining the Credit, a list of resources to which PacifiCorp applied the Credit, and future resources to which PacifiCorp may apply the Credit. Stakeholders also had a chance to briefly discuss the Credit with PacifiCorp during the 2019 IRP stakeholder meeting on July 26. The meeting materials indicate that PacifiCorp is intending to apply the Credit to gas and storage resources, in addition to coal, in the 2019 IRP.

While Utah Clean Energy appreciates the time PacifiCorp spent explaining this issue on July 26, Utah Clean Energy still has significant questions about whether it is appropriate to apply this Credit in the IRP process, how the Credit is generated, the specific functionality that the Credit is intended to reward, and why PacifiCorp has and continues to apply the Credit to a limited number of resources. Other parties have expressed a desire for additional clarity as well. Specifically, Western Resource Advocates, Interwest, and First Solar all noted in stakeholder feedback forms that renewable energy resources are capable of providing intra-hour flexibility services. In many instances, renewables can provide these services better than coal units because of their superior ramping capabilities. Western Resource

\* Required fields

Advocates and representatives from the Washington Utilities and Transportation Commission have also called for additional information related to the Credit.

Based on the information we have today, it is Utah Clean Energy's position that PacifiCorp's proposed application of this credit in the IRP will preclude an evaluation of all known resources on a consistent and comparable basis. Among other concerns, PacifiCorp does not apply the Credit to all resources capable of providing flexibility services, and PacifiCorp is excluding additional costs associated with operating coal units to generate the Credit.

The purpose of the IRP process, as defined by the Utah guidelines, is to evaluate all present and future resources on a consistent and comparable basis. See Utah IRP Guidelines - Docket No. 90-2035-01, Guidelines 1 and 4(c).

PacifiCorp's application of this Credit to a limited number of resources, which does not include all resources that are able to provide intra-hour dispatch benefits, violates the Utah IRP Guidelines. PacifiCorp intends to apply the credit as an offset to operation and maintenance costs for select resources, but does not intend to apply the credit to other resources that are capable of providing the same benefits. This will not result in a comparable comparison between resources. While PacifiCorp did indicate it would expand the application of the Credit to storage and gas resources in the 2019 IRP, PacifiCorp has not indicated that it will apply this credit to renewable resources. This is likely a violation of the Utah IRP guidelines.

As First Solar and others have said, renewable resources are capable of providing the intra-hour flexibility that the Credit rewards. Renewables are actually better at providing this flexibility than coal units because they can ramp faster. As more and more renewable resources saturate the grid, the ability of these resources to provide flexibility benefits will only increase. If applying the Credit in the 2019 IRP is appropriate, PacifiCorp should apply the Credit to all renewable resources that are capable of being ramped up or down to ensure that all resources are being considered consistently and comparably.

Finally, PacifiCorp is not including the additional operation and maintenance costs associated with running its coal units to generate the Credit. In a recent data request from Western Resource Advocates related to the 2017 IRP Update (docket 17-035-16), PacifiCorp stated that it does not include the incremental long-term operation and maintenance costs and loss-of-life from the additional plant cycling needed to generate the Credit. By not including these costs, the IRP will overestimate the beneficial value that the Credit provides, enhancing the unequal treatment of resources in the IRP.

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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.

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated. PacifiCorp should hold a technical conference on the Intra-Hour Dispatch Credit before locking analysis and modeling related to the Credit into the 2019 IRP. This will allow parties a chance to better understand how the Credit will affect the IRP and will result in more meaningful feedback from stakeholders.

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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