

# 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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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.](#)

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

Carbon assumptions for the 2019 IRP and coal unit retirement analysis

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.

Thank you for your response on October 10, 2018 to our October 4 joint stakeholder feedback form. However, the response did not provide us with the information that we requested, nor did it provide enough information for us to review and understand the rationale behind PacifiCorp's proposed carbon assumptions for the 2019 IRP.

In our request, we asked PacifiCorp to "provide the vendor studies underlying the different carbon cost assumptions proposed for use in the coal unit retirement analysis and IRP." We requested this information to better understand how the vendors arrived at the carbon prices in slide 44 of the September 27-28 stakeholder meeting deck, and to better understand why PacifiCorp chose Vendor B's prices for its base case and high CO2 price assumptions. In response, PacifiCorp provided a redacted spreadsheet summarizing Vendor B's CO2 prices for the high, medium, and zero CO2 price scenarios, accompanied by a brief (1-2 sentence) statement for each of these scenarios in support of the respective carbon price assumptions.

The information PacifiCorp provided is incomplete and insufficient to determine whether PacifiCorp's GHG price base case is reasonable. The information contained in the spreadsheet is highly redacted and largely limited to information that PacifiCorp already summarized in the CO2 price forecast table on slide 44 of the September 27-28 stakeholder meeting deck. Further, the explanations for each CO2 price scenario do not adequately describe how Vendor B arrived

\* Required fields

at the CO2 price assumptions. In one case, the statement is simply a recitation of the start date for the carbon price without any explanation for why that start date or the starting price was chosen. This limited information does not allow parties to understand what factors lead to Vendor B's CO2 price assumptions, nor does it provide the parties a better understanding of why PacifiCorp decided to use these specific CO2 assumptions over alternatives.

We appreciate that some of the vendor information is proprietary and subject to the confidentiality protections associated with the 2019 IRP process. However, the Company has a responsibility to develop the IRP in consultation with interested parties, and to "provide ample opportunity for public involvement and the exchange of information during the development of its [IRP]." See Utah Guidelines, no. 3, Docket No. 90-0235-01. Further, as PacifiCorp noted in its response to our feedback form, the parties requesting this information have already executed the necessary confidentiality agreements to participate fully in the 2019 Utah IRP process.

The information PacifiCorp provided thus far does not allow us a deep enough understanding of these issues to participate in the development of the 2019 IRP, especially given how soon PacifiCorp plans to begin its IRP and coal unit retirement analysis.

To allow parties a reasonable opportunity to provide meaningful feedback on the carbon price assumptions in the 2019 IRP and the coal unit retirement analysis, we ask that PacifiCorp provide us with detailed information outlining each of the factors that support Vendor B's high, medium, and zero CO2 price assumptions. We also ask for detailed information outlining each of the factors that support the other CO2 price assumptions considered in the 2019 IRP, i.e., the specific factors supporting Vendor A's medium and high scenarios, the factors supporting AEO 2018 high and medium scenarios, and any others not listed on slide 44.

In addition, please provide a detailed explanation for why PacifiCorp selected Vendor B's CO2 assumptions over the alternatives.

Again, we ask that PacifiCorp refrain from moving forward with its analysis until parties have had an opportunity to review the information that lead to Vendor B's carbon assumptions and PacifiCorp's decision to use those assumptions over the alternatives. We propose one week from the date of PacifiCorp's response to this request as a reasonable review period.

We reiterate that if PacifiCorp feels the need to start the IRP and coal unit retirement analysis before the parties receive and review the requested supplemental information, we recommend using the EIA's Annual Energy Outlook 2018 medium sensitivity, as depicted on slide 44 of the September 27-28 stakeholder meeting deck, as the new base case for both the IRP and coal unit retirement analysis. For this new base case we propose that PacifiCorp implement this cost curve in 2024, beginning with the 2024 cost.

While we appreciate PacifiCorp moving the start date for its base case CO2 assumption to 2025, we still believe that the base case prices are too low to represent the risk that PacifiCorp's ratepayers face. The EIA's Annual Energy Outlook 2018 medium sensitivity prices more reasonably capture that risk.

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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.

[Click here to enter text.](#)

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

[Click here to enter text.](#)

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\* Required fields

Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.

\* Required fields