

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

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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: 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.

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

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

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

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: 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?

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

Question: 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.

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".

Question: With "obligation to build" is PacifiCorp referencing FERC's pro forma tariff sections 13.5 and 15.4?

Question: 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?

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: Have any new restudies been completed?

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

Question: 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?

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

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

³ Please see relevant document at:

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

⁴ Please see relevant document at:

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

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Question: 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?

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

Question: 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?

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

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

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.

* Required fields