

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

*Name: Kevin Emerson

Title: Energy Efficiency Program Director

*E-mail: kevin@utahcleanenergy.org

Phone: (801) 608-0850

*Organization: Utah Clean Energy

Address: 1014 East 2nd Avenue

City: Salt Lake City

State: UT

Zip: 84103

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 annually in Utah in recent years.

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.

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.