

# PacifiCorp - Stakeholder Feedback Form

## 2021 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 2021 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 10/2/2020

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Title: Regulatory Analyst

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\*Organization: WA Utilities & Transportation Commission (WA-UTC)

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: 9/17/2020  Check here if not related to specific meeting

List additional organization attendees at cited meeting: \_\_\_\_\_

**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.  
Supply-side resource & CETA clarification Qs; PLEXOS case & sensitivity recommendations; resource performance & cost data request.

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.  
Please see accompanying WA-UTC staff feedback & questions document as well as three (3) Excel workbooks.

### **Commission Staff Feedback for PacifiCorp 2021 IRP: Public Interest Meeting #3 (Sep 17, 2020)**

This feedback, dated October 2, 2020, states the informal comments, questions, recommendations, and data requests of Washington Utilities and Transportation Commission Staff, Jim Woodward. Staff appreciates the continued work of PacifiCorp's IRP Team and the opportunity to participate. Timely feedback is offered as technical assistance and is not intended as legal advice. Staff reserves the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff opinions are not binding on the commission.

This staff feedback document is divided into three parts: 1) questions & comments regarding PacifiCorp's September 17 PIM #3 presentation content (i.e., *this Word document*), 2) additional feedback per company request for IRP modeling case & sensitivity run input, and 3) electric resource cost & performance data request.

Company response by **October 21, 2020**, is appreciated for select questions and requests in **BOLD**. The requested company response milestone is one (1) day ahead of PacifiCorp's PIM #4 (i.e., October 22-23<sup>rd</sup>). Receiving responses

\* Required fields

ahead of the company's next general public meeting would enable staff to better track the evolution of the company's 2021 IRP process and continue to offer value-add feedback.

I. **Public Interest Meeting #3 (9/17) – Presentation questions & comments**

1. Supply-side resources (SSR) background (slide 5) - **Did company reference regional efforts (e.g., NWPCC's Generating Resources Advisory Committee (GRAC) support for 2021 Power Plan) when developing this resource cost information for the 2021 IRP?**
  - a. If not, staff recommends the **Pac IRP team at least review the GRAC's [2021 Power Plan Specific Information re: reference plants](#)**. This action should confirm Pac's resource assumptions in its western service territory align with regional consensus.
  - b. Should company have additional questions after reviewing the above GRAC data, staff is happy to facilitate introductions with relevant NWPCC staff (e.g., [GRAC POC Gillian Charles](#)).

**PacifiCorp Response:**

PacifiCorp had not reviewed the Northwest Power and Conservation Council (NWPCC) Generating Resources and Advisory Committee (GRAC)'s 2021 Power Plan Specific Information re: reference plants.

- a) Upon review PacifiCorp finds the information supports PacifiCorp's resource assumptions.
- b) PacifiCorp does not anticipate a need for further information from NWPCC staff at this time.

2. Resource performance & cost summaries (slides 8 – 13) – **Please see [Sec III. Electric resource cost & performance staff data request](#) to company.**

**PacifiCorp Response:**

- a) Please see response in Section III.

3. Portfolio development & sensitivities (slides 17 – 19) – **Please see [Sec II. Staff feedback re: PacifiCorp's request for IRP modeling case & sensitivity run input](#)**

**PacifiCorp Response:**

- a) Please see response in Section II.

4. WA CETA – 2025 elimination of coal-fired resources (slide 25)
  - a. Staff wishes to clarify the action associated with “eliminat[ing] coal-fired resources from [a utility's] allocation of electricity,” pursuant to [RCW 19.405.030\(1\)\(a\)](#) is the subject of the on-going joint IRP ([UE-190698](#)) & CEIP ([UE-191023](#)) rulemaking.
  - b. Staff cautions the company's interpretation that elimination of coal-fired resources from its WA allocation of electricity by 12/31/2025 may not solely equate to removing “coal-fired resources [from WA] customer rates.” [RCW 19.405.020\(1\)](#) defines “allocation of electricity” for the purposes of setting electricity rates. However, satisfying the no coal requirement by 12/31/2025 may require compliance action on behalf of PacifiCorp beyond traditional ratemaking.

**PacifiCorp Response:**

PacifiCorp would appreciate any additional information regarding Staff's reference to what may be considered or required “beyond traditional ratemaking,” as well as an explanation of Staff's legal reasoning for its position.

PacifiCorp acknowledges that the joint IRP and CEIP rulemaking is ongoing, and the company will continue to address this issue within the rulemaking. Previously, the company's comments submitted on June 2, 2020 (in

response to question 7) and February 28, 2020 (in response to question 12) have provided recommendations regarding compliance with RCW 19.405.030(1)(a).

Please also see PacifiCorp's response to question 10, part a, of the feedback form sent by Washington Utilities and Transportation Commission Staff on August 7, 2020 in response to the July 30-31 IRP Public Input Meeting:

"PacifiCorp disagrees with Staff's legal interpretation. Please see RCW 19.405.020, Definitions.

(1) 'Allocation of electricity' means, for the purposes of setting electricity rates, the costs and benefits associated with the resources used to provide electricity to an electric utility's retail electricity consumers that are located in this state."

5. CETA long-term planning (slide 27)

- a. Staff appreciates PacifiCorp's awareness that discussion around equitable distribution of benefits will inform the company's 2022 CEIP (*upper right box on slide*).
- b. However, staff wishes to remind the company that **pursuant to [RCW 19.405.040\(8\)](#), PacifiCorp's 2021 IRP preferred portfolio needs to similarly address the equitable distribution of benefits.**
- c. Staff expects **future Pac 2021 IRP PIMs during Fall 2020 to facilitate the necessary equity discussions amongst stakeholders.**

**PacifiCorp Response:**

PacifiCorp will consider equitable distribution of benefits within its long-term planning processes as identified in the statute and subsequent rules.

6. CETA next steps (slide 29) – In addition to the planning activities listed, staff reminds the company the **filing date for PacifiCorp's 2021 draft IRP is 1/4/2021 per paragraph 26 of [Order 03 \(UE-180259\)](#).**

**PacifiCorp Response:**

PacifiCorp appreciates the ongoing collaboration with Staff regarding the upcoming draft Integrated Resource Plan (IRP), and the Company continues to work toward the January 4, 2021 deliverable date.

II. **Staff feedback re: PacifiCorp's request for IRP modeling case & sensitivity run input**

Please reference the two (2) accompanying Excel workbooks:

- **Cases & Sensitivities\_Pac 21 IRP\_OR & WA staff feedback\_20201002**
- **Cases & Sensitivities\_Pac 21 IRP\_addl WA CETA req\_20201002**

As follow up to the company's request made to stakeholders during PIM #3, the first workbook includes joint recommendations developed in collaboration with Oregon PUC staff (POC: Rose Anderson) while the second workbook contains additional WA-specific recommendations intended to help the Pac IRP team's PLEXOS modeling comply with CETA. Two tabs comprise each workbook:

1. Case scenario recommendations
2. Sensitivity recommendations

Unless otherwise specified, the suggested case & sensitivity runs in these files are CETA compliant having the following common attributes:

- Applies 2.5% social cost of carbon (SCC) as a cost adder,

\* Required fields

- Accounts for upstream natural gas GHG emissions, and
- Reflects renewable energy generation serving WA load to meet the 2030 GHG neutral standard and 2045 100% clean standard.

As part of its response to this feedback, **staff request the Pac IRP team indicate what recommended cases & sensitivities they are adopting and provide rationale for which runs they choose to exclude.**

**PacifiCorp Response:**

PacifiCorp will consider this request balanced with other stakeholder requests and time constraints.

III. **2021 IRP electric resource cost & performance data request**

Now that the Pac IRP team has shared with stakeholders its proposed supply-side resources for use in the 2021 IRP, staff request the company update and/or populate the **GREEN highlighted** cells within the “2021 IRP” tab in the accompanying **Resource Cost & Performance Comparison\_WA staff DR** Excel workbook. The Pac IRP team may recall this is a standard data request (DR) WA staff ask of the company during each IRP cycle. For reference, I have included PacifiCorp IRP values submitted during the 2019 IRP progress report and 2017 IRP cycles (*please see 2019 and 2017 reference tabs within workbook, respectively*).

To help the Pac IRP team prioritize work load, staff do not need this data request completed by the requested date for a company response to this PIM #3 feedback (i.e., 10/21/20). However, as part of the company response, **please indicate when the team can provide this requested resource cost & performance comparison data.**

**PacifiCorp Response:**

PacifiCorp will present its final supply-side resources table at the October 22, 2020 public-input meeting.

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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.

Please see accompanying three (3) Excel workbooks.

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

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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.