

# 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 10/24/2020

\*Name: Shannon Anderson

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\*E-mail: sanderson@powderriverbasin.org

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

\*Organization: Powder River Basin Resource Council

Address: 934 N. Main St.

City: Sheridan

State: WY

Zip: 82801

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.

Portfolio development

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.

In testimony to the Wyoming Public Service Commission on the 2019 IRP our organization provided information about the value of water rights at the Naughton and Bridger power plants. We would like a response from the company on how they will incorporate risk, cost, and benefits regarding water use and water rights in the 2021 IRP for both coal plants planned to be early retired and those planning to run longer.

### **PacifiCorp Response:**

The water rights for both the Naughton and Bridger Power Plants are tied to the continued operation of the plants and beneficial use of the water. PacifiCorp considers the benefits, costs and risks associated with water rights for each plant based on current and future operating plans. PacifiCorp closely monitors and documents its water use, and evaluation and future planning to ensure adequate water and backup sources are available for each plant are part of standard operation and maintenance procedures. The water needs of the respective Naughton and Jim Bridger power plants have been met even in extended drought years that have occurred during the power plants' history of operations. PacifiCorp does not foresee any immediate or near-term risk to the power plants' water supply needs while the respective generation plants continue to operate.

The water rights owned by PacifiCorp will remain in good standing for a period of time after the power plants retire and stop using the water rights. PacifiCorp is evaluating options to lease, transfer, sell or otherwise use its existing water rights if the power plants no longer require them. If leases, transfers, sales or other uses are not possible after a power plant retires, then the water rights will likely expire in approximately three years after they cease to be beneficially used.

\* Required fields

PacifiCorp has historically not included costs, risks and benefits associated with water rights at plants in the IRP due to their speculative nature. Consistent with past IRPs, the Company does not plan to consider these rights in the 2021 IRP.

**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.

<https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/rising-water-stress-risk-threatens-us-coal-plants-largely-clustered-in-5-states-60670594>

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated. The company should value the amount of water rights that will be made available upon retirement of the various coal units as a benefit to coal plant retirement. Additionally, the company should estimate the risk of climate change and regional drought in terms of water use at its coal plants. Both the cost/risk and benefits related to water use and availability should be inputs in the 2021 IRP.

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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.