

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 11/6/2020

*Name: Rose Anderson

Title: Click here to enter text.

*E-mail: rose.anderson@state.or.us

Phone: Click here to enter text.

*Organization: Oregon Public Utility Commission

Address: Click here to enter text.

City: Salem State: OR Zip: Click here to enter text.

Public Meeting Date comments address: 10/22/2020 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.

Front Office Transaction Limits

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.

On page 43 of the October 23 presentation, are the new Front Office Transaction limits applicable to all hours during the summer and winter, or only to peak hours? For example, would the new limits prevent Plexos from acquiring market purchases from COB during nighttime hours in August or at 11 am in September? If PacifiCorp is constraining market purchases in PLEXOS during off-peak hours, then OPUC Staff requests an additional portfolio be included in the 2021 IRP that relaxes constraints on market purchases during off-peak hours to a more reasonable level.

PacifiCorp Response:

PacifiCorp intends to apply the Front Office Transaction limits discussed at the October 22, 2020 public-input meeting across all hours during the applicable summer and winter months. In regard to the summer months of June to September specifically, PacifiCorp plans to assume that there is no purchase capability at COB, NOB, and Mona and up to 500 MW of purchases available at MidC.

PacifiCorp would note that because of the rising dependence of the WECC on solar power generation, off-peak or light load hour (LLH) periods are no longer synonymous with the lowest risk conditions. For example, overnight power prices are now frequently higher than prices in the middle of the day. Increasing dependence on duration limited energy storage would also contribute to lower purchase availability overnight. As a result, PacifiCorp does not believe that there is likely to be sufficient market liquidity to justify allowing higher market purchases for reliability in LLH periods over the IRP study horizon.

* Required fields

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 make sure that the constraints on market purchases are not excessively stringent during off-peak hours. At the very least, OPUC Staff requests one portfolio in the IRP where off-peak hour purchases are significantly less constrained than on-peak hours.

Please submit your completed Stakeholder Feedback Form via email to IRP@PacifiCorp.com

Thank you for participating.

* Required fields