

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 11/25/2020

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

Public Meeting Date comments address: **11/16/2020**

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. PLEXOS benchmarking results, price-policy modeling scenarios, distributed energy resource (DER) questions.

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.

1. **Public Interest Meeting #5 (11/16) – Presentation questions & comments**

1. PLEXOS benchmarking, action plan window results vs. 20-year planning period (slides 5 – 7) – Staff appreciated the modeling team’s walkthrough of the PLEXOS benchmarking similarities and differences compared to the SO 2019 IRP preferred portfolio. During PIM #5, the Pac modeling team maintained that PLEXOS’s endogenous consideration of reliability and stochastics explained why storage (battery) and utility solar + storage appeared to function as “substitutes.” However, staff observes two different substitution trends affecting storage and utility solar + storage over the 20-year planning horizon: 1) storage instead of utility solar + storage during the action plan window and through most of the 2020s vs. 2) solar + storage instead of storage during the 2030s, with an inflection year of 2028. If the locational value of solar + storage yields reliability benefits, one could infer that PLEXOS would always choose solar + storage over standalone storage.

a. **If PLEXOS benchmarking results differences are primarily due to the LTCE model’s endogenous reliability considerations, staff would appreciate further clarification why this difference in model architecture is producing two different substation trends over the 20-year planning period.**

2. Price-policy scenarios (slide 10) – Staff are accustomed to seeing three descriptors for each scenario (i.e., demand, gas price, GHG price). However, the slide only describes each scenario according to its gas price and

* Required fields

CO2 cost. Is the modeling team incorporating the load / demand forecast into these 5 scenarios? Or do these considerations come later?

3. CO2 cost scenarios (slide 14) – Re: SCGHG assumptions, staff is glad to hear PacifiCorp has adopted a 2.5% discount rate as required under WA’s CETA. **Staff reminds the company will need to update its SCGHG price scenario for the 2021 IRP to reflect inflation.** The [Social Cost of Carbon](#) page on the WA-UTC’s external website reflects the SCC in 2019 dollars per metric ton.
4. Power price scenarios (slide 15) – **WA staff agree and support the [market price recommendation](#) submitted by Oregon PUC staff on Nov 17 and posted to PacifiCorp’s [Stakeholder feedback](#) web page. WA staff strongly encourage the Pac IRP team to adopt such an Aurora price forecast for purposes of the company’s 2021 IRP modeling.** Not doing so may risk the company making planning decisions based upon an artificially low market price forecast that does not consider CETA cost impacts.

II. **Distributed energy resource questions related to PacifiCorp’s distribution planning**

Per the company’s request during the Nov 23 bi-weekly IRP touchpoint, staff is re-circulating the following DER discussion questions that pertain to PacifiCorp’s distribution planning.

Note: Staff’s treatment of DERs in the below questions considers more than just private generation sources that are behind the customer meter. WA-UTC staff expect the **2021 electric IRPs to also consider DER options that require more control/planning on behalf of the utility (e.g., community solar initiatives).**

1. **How and when will PacifiCorp be able to estimate the allowable level of DERs of different types on the various feeders or substations on their system?**
 - a. Note: To adequately answer question 1, Pac will likely need to consider more than just the results from the company’s [2020 private generation study](#).
2. **How and when will Pac be able integrate various levels and types of DERs at the IRP level of analysis, keeping in mind DER benefits are often quantified at the sub-hourly level?**
3. **How and when will Pac be able to value different levels of DERs of different types on the various feeders or substations or system?**
 - a. Note: Valuation of DERs and avoided cost calculations will be key, including transmission and distribution avoided (or deferred), ancillary services, and other NEI inputs.

How do DERs complement Pac's utility-scale generating resources?

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.

NA.

Recommendations: Provide any additional recommendations if not included above - specificity is greatly appreciated. Note: Staff is re-circulating DER questions to get a better perspective of how the IRP process intersects w/ company’s distribution planning. The company specifically asked staff to re-issue these questions during the Mon, 11/23, staff-company bi-weekly IRP touchpoint.

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

Thank you for participating.

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