

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 12/4/2020

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Public Meeting Date comments address: 12/3/2020 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.

Page 18: Reliability, Evaluation of portfolio performance under strained system/regional conditions (i.e., sustained weather events) based on actual events that have occurred in recent year

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.

In accordance with the Commission's public deliberations held on October 8, 2020, for Wyoming Docket No. 90000-147-XI-19 (Record No. 15389), In the Matter of the Commission's Investigation Pursuant to Wyoming Statute 37-2-117 of the Integrated Resource Plan filed by Rocky Mountain Power on October 18, 2019, WIEC requests that PacifiCorp include an analysis in the 2021 IRP with respect to the potential impact on resource adequacy of weather events that cause renewable energy production to be depressed over an extended period of time. PacifiCorp has indicated that it intends to incorporate such analysis in the 2021 IRP based on actual events that have occurred in recent years, as noted in its December 3, 2020 IRP Public Input Meeting slides, at p. 18. WIEC recognizes that analysis of historical data from PacifiCorp's system is likely the best place for PacifiCorp to start with this analysis; however, the event WIEC would like to see studied might occur less than once in ten years. As such, there might not be enough historical data to reveal the magnitude, duration, and frequency of such events. Thus, if the historical data turns out to be insufficient, then an assumed hypothetical event should be generated, at least as a sensitivity case. To generate this hypothetical event scenario, PacifiCorp should use outage events that occurred on a system with similar geographic features and generation portfolios as PacifiCorp's. The hypothetical event should be at least 39 hours in length, based on the actual

* Required fields

event physically experienced on the MISO system, referenced below. WIEC requests that PacifiCorp incorporate a stochastic analysis of these weather related extended outage risks as part of its PLEXOS analysis of resource options or, alternatively, as part of any supplemental loss of load expectation, loss of load hours and/or expected unserved energy analysis PacifiCorp may be undertaking as part of its 2021 IRP. Additionally, WIEC requests that PacifiCorp explain how it is modeling such potential weather-related extended outage risks in the 2021 IRP. As background and to provide context to this request, the 2019 Preferred Portfolio calls for PacifiCorp to bring significant amounts of renewable energy resources online, and PacifiCorp has limited experience integrating renewable resources into its existing generation portfolio while simultaneously retiring existing dispatchable facilities. This inherently creates some uncertainty with respect to how the shift to less-dispatchable capacity and increased reliance on variable energy (i.e., renewable resources) will impact the operations and reliability of its system. Further, the 2019 IRP did not perform any deterministic or stochastic analyses with respect to the potential impact on resource adequacy from weather events that may depress renewable energy production over an extended period of time. This risk is discussed in an article from E&E News about the impacts of the 2019 polar vortex on the Midcontinent Independent System Operator, Inc. (MISO) northern region and describes how the dramatic dip in wind energy production and forced outages on thermal plants on January 30-31, 2019 had to be offset with increase production from coal and gas-fired units within the region, imports from other regional systems, and demand reduction mechanisms. Turbine shutdowns in polar vortex stoke Midwest debate, E&E NEWS, Tomich, Jeffrey (Feb. 27, 2019), available at <https://www.eenews.net/stories/1060122535>. More recently, during January 28-30, 2020, the entire MISO footprint experienced a severe wind drought for a period of 39 hours where the total wind generation output in MISO dropped to less than one percent of nameplate capacity. MISO Operations Report Markets Committee of the Board of Directors (Mar. 24, 2020), available at <https://www.misoenergy.org/events/loss-of-load-expectation-working-group-lolewg---june-9-2020/>. WIEC's request seeks to ensure PacifiCorp's electric system is not at risk to similar outages that will impact PacifiCorp's customers.

PacifiCorp Response:

Thank you for your feedback. PacifiCorp will consider this request balanced with other stakeholder requests and time constraints.

In response to IRP requirements in Washington and Oregon, PacifiCorp will scope and model a climate change sensitivity/scenario that will incorporate the best science available to analyze impacts including, but not limited to, changes in snowpack, streamflow, rainfall, heating and cooling degree days, and load changes resulting from climate change, which may include the weather events raised in this request. In addition, the company is likely to include observed trends, future projections, and potential system impact in the discussion of the analysis.

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

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

Thank you for participating.

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