

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: 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.

SWEEP has concerns with the CPA results posted in the file 2021 Conservation Potential Assessment Final Energy Efficiency Measure Results. The full Achievable Technical Potential appears to not be consistent with recent Rocky Mountain Power (RMP) program results and RMP's program goals for 2021 in Utah, this discrepancy heightens the need to complete two requests made by SWEEP in previous Stakeholder Input forms that are currently unresolved. In 2021, the CPA found an Achievable Technical Potential of 344,258 MWh in Utah. This is the amount of Class 2 DSM available in Utah without regard to cost. Given that RMP had approximately 24,490,305 MWh of sales in Utah in 2019 this is equivalent to a total Achievable Technical Potential of about 1.4% of sales per year. Leading utilities in the Southwest, such as Xcel Energy in Colorado, have submitted plans to cost-effectively achieve savings equivalent to more than 1.7% of sales in 2021. There are many similarities between the service territories of RMP in Utah and Xcel in Colorado making it difficult to fathom how Xcel could plan to cost-effectively achieve more Class 2 DSM in its service territory than is technically achievable regardless of cost to RMP. The achievable potential in the CPA actually declines in 2022, when Xcel expects to achieve similar levels of savings. The CPA results also seem inconsistent with RMP's own recently filed Class 2 DSM forecast. In this forecast, the Company plans to achieve 291,841 MWh of Class 2 DSM. To achieve these savings, RMP would need to acquire 75% of the achievable residential Class 2 DSM not including Home Energy Reports

* Required fields

and 84% of the non-residential Class 2 DSM potential. Given that much of the potential in the CPA is very costly and likely not cost-effective, it does not appear feasible that the Company could acquire this high level of the total energy efficiency potential in its service territory. Taken together, these results show that the CPA is vastly underestimating the amount of Class 2 DSM available in Utah. SWEEP has made two previous requests in its Stakeholder Feedback Form from 1/3/2020. First, we requested that the Company compare results from the 2021 and previous CPAs with historical program achievement in Utah and other jurisdictions. This would allow the Company to ground truth some of the assumptions in the CPA and identify areas where assumptions in previous CPAs did not materialize in the market. Second, SWEEP asked the Company to develop multiple cases for Achievable Technical Potential to help assess the tradeoffs between investments in energy efficiency versus other resources. Again, given the low potential identified in the CPA, we believe this request is even more important to identify potential cost savings from maintaining investments in DSM resources at a reasonable level. SWEEP asks the Company to complete these requests in time to inform the IRP modeling. We stand ready to assist in any way possible.

PacifiCorp Response:

The Company's Class 2 DSM forecast for 2021 is consistent with historical precedent. Historically, the Company's annual forecast reports have been based on the most recently published IRP. Given that the 2021 IRP has not yet been published, the Company's 2021 forecast, filed November 2, 2020 in Docket No. 20-035-31, was based on the 2019 IRP, which selected 254,120 MWh for Class 2 programs. The Company's forecast with Home Energy Report ("HER") first-year savings is 291,841 MWh, and with HER incremental savings the forecast range is 241,414 – 266,826 MWh. While the 2019 IRP included expected levels of HER savings in its baseline load, it did not account for the program's expansion in 2020, which will yield incremental savings in 2020 and 2021. Incremental HER savings have been included in IRP selections historically when incremental savings have been planned on, and have been counted towards the Class 2 portfolio savings. The 2020 expansion of HER was not planned on at the time of the 2019 IRP's publication, and was therefore not included. The HER expansion was one of the adaptive actions the Company's took to counter the impacts of COVID-19 on the DSM portfolio. Notwithstanding the COVID-19 pandemic, the Company continually adapts to the market to manage the Class 2 portfolio and achieve targeted savings. If HER incremental savings are accounted for as they have been historically, the Company's 2021 forecast meets the 2019 IRP target of 254,120 MWh. Additional details concerning HER incremental savings are included in the Company's reply comments filed December 17, 2020 in Docket No. 20-035-31.

The CPA is a twenty-year study of technical achievable potential meant to inform resource selections in long term planning and is specifically tailored to PacifiCorp's service territories. Each time the CPA is refreshed, it is a significant undertaking to update all the underlying assumptions. As discussed throughout the stakeholder meetings in 2020, the interactions of these many assumptions culminate in a year to year estimate of technical achievable potential that can vary between studies. Over time, the impacts to annual potential vary. For example, from the table below which shows summarizes the technical achievable potential by year for Utah from the past three studies, the 2021 CPA shows potential increasing and exceeding prior study amounts from 2025 forward.

UT Potential (MWh)	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
2017 CPA TA	396,080	406,754	370,126	385,429	373,168	363,681	361,778	349,100	334,791	318,166	303,117	286,859
2019 CPA TA			370,594	378,694	387,676	401,683	394,453	388,735	377,304	361,891	347,147	319,931
2021 CPA TA				344,258	319,831	339,665	359,904	396,737	398,940	426,858	440,628	441,509

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.