

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 2020-12-04

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Title:

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*Organization: SWEEP

Address:

City:

State:

Zip:

Public Meeting Date comments address:

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.

2021 CPA Final Measure Results

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 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

* Required fields

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.

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

Thank you for participating.