

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 4/13/2021

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Title: **Economist**

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*Organization: Sierra Club

Address: 2101 Webster Street, Suite 1300

City: Oakland

State: CA

Zip: 94612

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

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Lindsay Beebe, Rose Monahan, Ed Burgess,
Maria Roumpani

***IRP Topic(s) and/or Agenda Items: Operating 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.

1. According to the IRP presentation on December 3rd, PacifiCorp intends to model "operating limits" in lieu of emissions reductions controls to comply with Clean Air Act requirements at all units on a going forward basis. For each unit that is listed as being subject to an "operating limit" please provide: 1) PacifiCorp's definition of "operating limit," including whether PacifiCorp simply anticipates a reduction in capacity factor?

PacifiCorp Response:

The term "operating limit" generally refers to a criteria pollutant emission limit proposed by the Company which can be imposed by a regulatory agency. In this case, PacifiCorp has proposed operating limits, which the Company refers to as reasonable progress emission limits ("RPEL"). RPELs provide a cap to NOx and SO₂ emissions as a control measure to satisfy reasonable progress requirements for the second and third planning periods of the Regional Haze Rule. RPELs are proposed as an alternative to mandatory emission control retrofits.

2. If an "operating limit" is defined, in whole or in part, as a reduction in capacity factor, please provide the capacity factors under consideration for each coal unit that would be required to comply with Clean Air Act requirements.

PacifiCorp Response:

* Required fields

The operating limits, or RPELs are proposed as plant-wide emission limits. The RPELs may be achieved by numerous measures, including reduced usage, installing additional controls, or any other measure which complies with applicable requirements. These operating limits function the same as any other emission limit, where the company cannot exceed a particular emission threshold for a particular time. Additional per-unit information can be found in the [December public-input meeting materials](#), beginning on slide 5.

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@Pacifcorp.com

Thank you for participating.