

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 4/27/2021

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Phone: Click here to enter text.

*Organization: Western Resource Advocates

Address: Click here to enter text.

City: Click here to enter text.

State: Click here to enter text. Zip: _____

Public Meeting Date comments address: 12/3/2020

Check here if not related to specific meeting

List additional organization attendees at cited meeting: _____

***IRP Topic(s) and/or Agenda Items:** April 23 public-input meeting

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. Please explain how coal fuel supply plans feed into IRP modeling. What information is provided by the fuels group to the IRP team? Are there additional assumptions used in modeling not provided by the fuels group?

PacifiCorp Response:

The fuels group provides the IRP team with fuel prices for each generator, many of them with price tiers defined at various fuel quantities. To see examples of input files, please reference the 2019 IRP Confidential data disk, under "Master Assumptions", within each case the coal unit and fuel assumptions are available. Note, that the modeling of fuel prices with price tiers is an improvement in the 2021 IRP model.

2. For coal plants with take-or-pay fuel contracts that include pricing tiers, please describe how these tiers affect dispatch and the determination of the MWh produced by each unit operating at the plant.

PacifiCorp Response:

For coal plants with take-or-pay fuel contracts, the incremental price decreases as the fuel volume increases once the contract required minimums are purchased or paid. This means that once a fuel quantity is met, additional fuel usage becomes more appealing to the model. There are other factors that impact dispatch, such as variable operation and maintenance costs, availability of market sales, and emissions costs in certain price scenarios.

* Required fields

3. For coal plants with take-or-pay contracts that include pricing tiers, please describe how these tiers are used to determine the PVRR of the plant's (units') annual operation.

PacifiCorp Response:

The take-or-pay coal contract provisions are modeled in Plexos. Also included are tiered fuel prices to recognize more coal can be purchased when economic. To the extent a coal unit is retired early, and the coal contract minimum take provision are not met, the model imputes the penalty coal cost provisions as required under the contract. These calculations are accounted for in the PVRR of the portfolios.

4. Does Plexos treat the minimum-take provisions of the take-or-pay contracts as fixed and assure that that these minimums are met in each year? Can the plant's total generation drop below the minimum-take requirements? If, so, are the costs associated with meeting the unmet minimums included in the PVRR?

PacifiCorp Response:

A plant's total generation cannot drop below the minimum take requirements unless it is more cost effective to retire the unit, including the decommissioning costs.

5. How does Plexos account for the fuel plans of the Company-owned mines? Does Plexos assure some minimum amount of fuel is burned in each year consistent with mine plans?

PacifiCorp Response:

Yes, Plexos accounts for the Jim Bridger mine plan, which is based on the number of units planned to be operated and operating characteristics. The life of the mine is also considered in the plan. The take or pay coal contract provisions are modeled in Plexos to recognize variability in the 2021 IRP modeling from coal unit retirements. Tiered fuel prices are included to recognize more coal can be purchased when economic.

6. Coal contracts have specified lives. How does the Company forecast the fuel cost forecasts to be used in the years following a contract expiration?

PacifiCorp Response:

PacifiCorp uses forward price curves prepared by third-party experts and management's best estimates for coal costs in the years following contract expiration.

7. How does the modeling of the coal fuel supply in Plexos compare with the modeling of the coal fuel supply in the ABB models?

PacifiCorp Response:

The coal fuel supply was modeled in ABB with an annual price per MMBTU. In Plexos, there will be multiple prices within each year depending on fuel quantity. Please see PacifiCorp's response to question 3 above.

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.

* Required fields