

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 8/3/2021

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Public Meeting Date comments address: 7/30/2021 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.

Portfolio Optimization, slide 5

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. In its July 30th IRP presentation PacifiCorp presented slides discussing the IRP modeling and PacifiCorp's assumptions. On Slide 5 of that presentation, PacifiCorp noted, "Driven by anticipated permitting challenges and federal policy risks, PacifiCorp is focused on alternatives to new natural gas plants." This was presented without further explanation and no discussion of the challenges alluded to.

PacifiCorp should not dismiss natural gas as an option for future generation resources. PacifiCorp should allow the model to select natural gas plants as a resource option. While challenges exist, all resource types have permitting challenges and federal policy is always changing. Gas plants have been a key part of a reliable portfolio. Given recent reliability concerns throughout the western US, dismissing gas plant additions in the IRP process is imprudent. This up front decision to exclude gas plants from the modeling risks not illuminating a least cost, least risk portfolio and appears to reflect other policy and resource considerations that PacifiCorp has not adequately explained and that are not obvious.

PacifiCorp Response

Thank you for this feedback. PacifiCorp's modeling and portfolio outcomes demonstrate reliability and is based on a least-cost, least-risk assessment and selection process. PacifiCorp is modeling gas conversion options on certain existing coal units. However, when considering the potential for future greenhouse gas policies,

* Required fields

PacifiCorp has noted there are considerable stranded-cost risks associated with planning a system that is reliant on new natural gas resources with depreciable lives ranging between 30 to 40 years (i.e., a new gas-fired resource placed in service in 2030 would be depreciated as late as 2070). Further, when considering current state policies, it is not feasible to assume new natural gas resources can get the permits needed to site and operate such a facility in many parts of PacifiCorp's service territory. Finally, PacifiCorp has observed that there is very limited development activity for new natural gas facilities. This was most recently evident in the 2020 All Source Request for Proposals, which did not result in a single bid for new natural gas resources. Nonetheless, PacifiCorp anticipates producing a sensitivity to allow new natural gas proxy resources.

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.