

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 8/9/2021

*Name: Rose Anderson

Title: Economist

*E-mail: Rose.anderson@state.or.us

Phone: Click here to enter text.

*Organization: Oregon Public Utility Commission

Address: Click here to enter text.

City: Click here to enter text. State: Click here to enter text. Zip: Click here to enter text.

Public Meeting Date comments address: 6/25/2021 Check here if not related to specific meeting

List additional organization attendees at cited meeting: Click here to enter text.

***IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Renewables load correlation, Supply Side Resources, Coal

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 the Natrium molten salt tank would provide power to the grid in engineering terms, including the expected approximate ramp rate of the molten salt storage.
2. Given that Oregon Senate Bill 1547 requires the company to acquire all cost effective demand response (DR) as directed by the Commission, and given that actual DR bids were found to be cost-effective in the 2020AS RFP, has PacifiCorp included any of the DR bids selected in the 2020AS RFP as existing resources in the indicative portfolio? Please explain why or why not.
3. Does PacifiCorp plan to ensure that its retail electricity customers have access to transmission capacity on the B2H line before committing to pay for the construction of the line? If so, please explain how PacifiCorp will ensure access for its customers before construction.
4. Does PacifiCorp include its rate of return on capital investments on utility-owned resources:
 - a. In IRP modeling? Please explain.
 - b. In RFP modeling of the final shortlist? Please explain.
5. Is the Plexos model capable of endogenously modeling economic cycling for coal/gas plants? If so, would it be possible to include this in at least one 2021 IRP portfolio? If not, would PacifiCorp please consider including at least one sensitivity that looks at economically cycling one of the more expensive coal units, beginning after the expiration of its current coal contract?
6. Please provide, as a part of the 2021 IRP, a graph of GHG emissions by year for top portfolios and sensitivities in the 2021 IRP.

* Required fields

7. Please provide, as a part of the 2021 IRP, GHG emissions in a 12x24 matrix for top portfolios and sensitivities in the 2021 IRP.
8. Are there any differences between the assumed O&M costs for coal plants in the PLEXOS modeling and the observed coal O&M costs disclosed in PacifiCorp’s power cost filings? If so, please explain what the differences are and why they are different.
9. What percent of PacifiCorp MWh sold to Oregon retail customers in 2020 were from zero emissions resources? (For purposes of this response, assume market purchases have WECC-wide emissions profile.) Will the 2021 IRP produce an estimate of the zero-emission MWh necessary to meet Oregon’s Clean Energy targets of reduced GHG emissions?
10. Staff’s expectation is that, while a Clean Energy Plan is not required in the 2021 IRP, PacifiCorp will include in the IRP an assessment of the most cost-effective way to meet the carbon reduction targets in Oregon’s House Bill 2021, which calls for a reduction in emissions of 80% by 2030 from baseline emissions. Please explain how the upcoming IRP will address how PacifiCorp plans to meet this target that is less than 9 years away.
11. In the 2021 IRP, Staff recommends that PacifiCorp demonstrate that the preferred portfolio is compatible with a least-cost, least-risk approach to providing enough zero-emissions energy to meet Oregon’s HB 2021 requirements during all hours, not only on an average annual basis.
12. For the purposes of assessing how the emissions profiles of any proposed IRP portfolio meets Oregon’s new energy policy landscape and targets, is the following data for PacifiCorp from DEQ’s publicly available emissions data¹ accurate? Are PacifiCorp’s average emissions for Oregon for 2010 through 2012 approximately 9,088,886 Metric Tons of CO2 Equivalent?

Year	Metric Ton of CO2 Equivalent (MTCO2e)
2010	9,248,689
2011	8,880,884
2012	9,137,084
2013	9,626,625
2014	9,582,985
2015	9,701,719
2016	8,422,662
2017	8,628,965
2018	8,696,220
2019	9,042,557

13. Will a design characteristic and/or parameter of PacifiCorp’s preferred portfolio in this IRP be Oregon-related annual emissions of 1,817,777 MTCO2e or less by 2030? Why or why not?
14. Given current planning cycles what is the earliest date that PacifiCorp believes it could deliver a Clean Energy Plan to the Oregon DEQ and PUC?
15. Please describe the emissions data and analysis that will be included in the IRP, including how granular the emissions analysis will be on a temporal basis and how it will impact portfolio scoring.
16. Please explain how PacifiCorp calculates the emissions associated with market sales in its GHG reporting to Oregon Department of Environmental Quality.

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.

¹ See <https://www.oregon.gov/deq/FilterDocs/ghgmissionselectBbase.xlsx>

* Required fields

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.