

PacifiCorp - Stakeholder Feedback Form

2023 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 2023 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

*Name: Sophie Hayes

Title: _____

*E-mail: Sophie.hayes@westernresources.org

Phone: _____

*Organization: Western Resource Advocates

Address: _____

City: _____

State: _____

Zip: _____

Public Meeting Date comments address: June 10, 2022

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.

Jim Bridger modeling, energy mix disclosure, GHG reporting, confidentiality designations, load forecasting, natural gas resources, hydrogen

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. Reiteration of Recommendations from WRA's Comments on the 2021 IRP

Modeling the Jim Bridger plant:

- Address Idaho Power's intended 2028 exit from the Jim Bridger plant by assuming that any future costs beyond Idaho Power's exit are borne entirely by PacifiCorp customers.
- Evaluate options for Jim Bridger other than retrofitting the plant to continue to burn coal (from the Powder River Basin), including early retirement scenarios.
- Model only existing take-or-pay contracts. Projected take-or-pay contracts should not be assumed.
- Develop an alternative mine plan with lower minimum-takes to mitigate the fuel cost risk borne by customers.

Energy mix disclosure with transparency about null power: PacifiCorp should not infer that null power is renewable in its energy mix reporting. PacifiCorp should visually identify the amount of forecast energy generation from null power (that is, Idaho, Utah, and Wyoming's allocated shares of eligible generation). This amount should not be labeled as renewable in any figures representing PacifiCorp's projected energy mix (unless and until PacifiCorp is directed to retain the renewable attributes associated with that energy); rather, it should be designated as null power. Without this clarification, PacifiCorp is misleading the public, and it is impossible to accurately understand the energy mix projected to serve PacifiCorp customers over time.

* Required fields

GHG reporting: PacifiCorp’s GHG accounting assumes that direct emissions associated with renewable energy generation is zero. However, when PacifiCorp sells RECs, it loses the right to claim these zero emissions attributes (someone else has purchased the exclusive right to claim them). This practice leads to emissions double-counting because both PacifiCorp and off-system REC purchasers are claiming the zero-emissions attributes of generation from PacifiCorp’s renewable resources. For example, corporations with sustainability goals frequently use unbundled RECs as emissions offsets against their grid-supplied energy mix in reporting emissions reduction progress. This issue may be remedied by assigning an emission factor to null power, which would increase the overall emissions intensity of PacifiCorp’s resource mix but would avoid double-counting. WRA recommends that PacifiCorp make reasonable efforts to forecast annual MWh of null power (consistent with Commission direction to sell RECs) and apply an emissions factor to those annual MWh. WRA recommends PacifiCorp use the most current fossil fuel emissions rate for the WECC region as reported by the EPA (available at <https://www.epa.gov/egrid/data-explorer>).

2. Questions & Requests for Additional Information

Confidentiality designations. At what level of granularity can PacifiCorp provide non-confidential information about the capacity factors of its coal units/plants over the planning horizon?

Load forecasting. Please provide more information about how the 20-year normalized weather forecast relates to the climate change/Reclamation Study case. For example, does PacifiCorp use the temperature estimates in the Reclamation Study to increase temperatures relative to the 20-year normalized case, or is the climate change case developed independently of the 20 year normalized weather case?

Natural gas resources. The Utah Commission has directed PacifiCorp to allow the capacity expansion model to select new natural gas resources. Given the growing risk of investing in fossil fuel infrastructure and the climate impacts of continuing to burn fossil fuels, we recommend that any new natural gas resource additions be modeled with a depreciable life that ends by 2050.

Hydrogen. Please provide detailed information on when different types of natural gas facilities can be accommodated to burn clean hydrogen. Please explain how this timeline corresponds to when PacifiCorp can have a reliable supply of clean hydrogen delivered to hydrogen-burning plants. Please provide additional information about how PacifiCorp might use excess renewable energy to produce hydrogen. Where would production facilities be? What is a feasible timeline of the Company’s ability to produce clean hydrogen with excess renewable energy? What are the cost and load assumptions the Company is using to model this?

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.

* Required fields