

# 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 2022-10-05

\*Name: Shannon Anderson

Title: \_\_\_\_\_

\*E-mail: sanderson@powderriverbasin.org

Phone: \_\_\_\_\_

Powder River Basin Resource

\*Organization: Council, also on behalf of Sierra Club & HEAL Utah

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Public Meeting Date comments address: \_\_\_\_\_  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.

Natrium nuclear plant in Kemmerer, Wyoming

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.

Our organizations remain concerned about the level of risk associated with the Natrium nuclear power plant project, and ask the company to fully disclose the answers to the following questions during a forthcoming public IRP meeting: Why has Natrium been selected as a resource when there is no identified fuel source? What is PacifiCorp doing to mitigate the risk that a fuel source may not be available? Please explain whether the 2023 IRP will assume that the Natrium plant will be online by 2028 or some later date. Please explain what year the 2023 IRP will assume that \u001Cproxy\u001D nuclear resources will be available. Has PacifiCorp entered into any power purchase agreements or other contracts with TerraPower for the project? If not, how can PacifiCorp be certain of the price to use for modeling purposes in the IRP? Would it be better to model a high/medium/low power purchase price? Do the power purchase costs assumed in the IRP include an \u001Call in\u001D price encompassing construction, O&M, fuel costs, transportation, decommissioning, waste disposal, etc.? If TerraPower will be responsible for any of these costs going forward, please explain. How much money has PacifiCorp already invested in the project? Have there been any regulatory approvals for the use of this money? Has PacifiCorp completed due diligence on the proposed project site? What is PacifiCorp\u0019s role in the \u001Claboratory\u001D that will test out the sodium cooled nuclear technology at the site? Is the \u001Claboratory\u001D located on PacifiCorp/Rocky Mountain Power property and if so, what is the land use and access agreement in place with TerraPower?

**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.

\* Required fields

Fuel source concerns: \u001CA reactor that doesn\u0019t have access to fuel is not a particularly useful piece of equipment,\u001D TerraPower Director of External Affairs Jeff Navin said. <https://wyofile.com/fate-of-natrium-nuclear-plant-may-depend-on-turning-bombs-into-fuel/> Oregon's partial non-acknowledgement of Natrium in the 2021 IRP Action Plan, and Utah's complete non-acknowledgement due to "Failed to Comply with Guideline 3 Because It Did Not Provide Ample Opportunity for Public Input and Exchange of Information" <https://wyomingtruth.org/blog-other-news/part-1-a-struggling-coal-town-looks-to-a-nuclear-future> (discusses the laboratory that will break ground next year)

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated. For the 2021 IRP, our organizations asked: Please provide an open and transparent range of cost estimates for this proposed plant as opposed to a single estimate. We renew that request. We also ask for full disclosure of answers to the aforementioned questions at public stakeholder meetings and in the text of the 2023 IRP narrative.

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## PacifiCorp Response (11/9/22)

### Question Set 1:

- Natrium was selected in the 2021 IRP as it was demonstrated to provide substantial savings to customers. TerraPower is responsible for providing fuel for the reactor and has received DOE grant funding to assist in the manufacturing of the fuel for the facility.
- PacifiCorp continues to monitor TerraPower and its overall progress and will continue to assess anticipated costs and risks in upcoming IRPs
- Currently, TerraPower has indicated that the demonstration reactor will be online within the decade. PacifiCorp will evaluate risks associated with potential delays to this schedule in its upcoming IRP. The 2021 IRP No Natrium Sensitivity is public, included in the sensitivity filing. IRP has not filed any analysis with a later date. We have the same type of sensitivity slated for the 2023 IRP. However, we also have a request for a sensitivity that assumes Natrum is delayed. We have one other request for an increased cost sensitivity; however, we think this sensitivity is unnecessary because our planned analysis will already tell us how much the cost can go up before the project becomes uneconomic.
- The IRP will assume the availability of proxy nuclear resources, including small modular nuclear within a decade.
- No power purchase agreements have been made with TerraPower. PacifiCorp has entered a land sale agreement with TerraPower for a parcel of land south of the existing Naughton Power plant.
- As with all future resources modeled in the IRP, there is no guarantee that modeled values will reflect future conditions. However, the Company is in negotiation to establish the cost and performance of the Natrium™ nuclear reactor demonstration project. PacifiCorp's 2021 Integrated Resource Plan (IRP) reflects information from TerraPower LLC's project discussions. The Natrium™ nuclear reactor demonstration project final capital cost is dependent on the amount of the United States (U.S.) Department of Energy's (DOE) contribution. Currently, the IRP provides an indicative price; the final price will not be established until a contract is successfully negotiated.
- The 2021 IRP did not evaluate a power purchase agreement for TerraPower.
- The 2021 IRP assumed PacifiCorp would purchase the unit at a fixed price upon completion. Other operating cost assumptions evaluated in the IRP analysis are based on confidential inputs provided by TerraPower.
- Yes, TerraPower is responsible for all development costs including cost overruns.
- How much money has PacifiCorp already invested in the project?
  - None
- Has PacifiCorp completed due diligence on the proposed project site?
  - PacifiCorp continues to conduct due diligence on the project.

\* Required fields

- It is presumed that the reference to ‘laboratory’ is in reference to the sodium test facility. The facility will not contain any nuclear material but will be used for the testing of the sodium cooling fluid. PacifiCorp is not involved in the construction or operation of this facility.
- The sodium test facility will be located on a parcel of land that PacifiCorp sold to TerraPower for construction of the facility

### Question Set 2:

- PacifiCorp has not received any cost estimates which identify molten storage costs in this manner.
- It is the understanding of the Company that Natrium would receive PTC benefits.
- The 2021 IRP was conducted assuming the facility would qualify for 45J Tax Credits. Pending further definitive guidance from the U.S. Treasury and/or the Internal Revenue Service, the passage of the Inflation Reduction Act provides alternative tax credits which provide additional customer benefits as compared to those modeled in the 2021 IRP. The company continues to work with TerraPower to identify the approach that will result in the greatest customer benefit.

Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.