

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 2022-10-18

*Name: Lindsay Beebe Title: _____

*E-mail: lindsay.beebe@sierraclub.org Phone: 8604907828

*Organization: The Sierra Club

Address: 824 South 400 West, Suite A105

City: Salt Lake City State: _____ Zip: 84101

Public Meeting Date comments address: 10-13-2023 Check here if not related to specific meeting

List additional organization attendees at cited meeting: Rose.monahan@sierraclub.org

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

Reliability resources, coal capacity factors, CCUS, load forecast adjustments, supply side resource adjustments, IRA, Jim Bridger fuel contract

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) Reliability resources: Please confirm that in the ST model, all resources included in the 2023 IRP will be available for model selection to fill identified reliability gaps. If this is not the case, please clarify. 2) Coal capacity factors: In order to inform our comments on the current IRP we would like to understand how previous PLEXOS modeling projected coal capacity and if that matched with current operations. Please provide projected capacity factors for the coal fleet, in the aggregate and by individual coal plant, from the 2021 IRP preferred portfolio (in MW and MWh). Or if unavailable, provide the difference between 2021 IRP projected capacity in the year 2022, and 2022 actual capacity, on aggregate and by individual coal plant. 3) CCUS: In evaluating CCUS for certain Wyoming coal plants, explain how PacifiCorp intends to meet Ozone Transport Rule and Regional Haze requirements for NOx and SOx for coal plants with CCUS installed. For instance, is PacifiCorp assuming operational limits, new pollution control technology, or some other compliance strategy? 4) Load forecast adjustments: Please detail which sections of the IRA have been incorporated into the updated forecast, by section number. 4a) Please clarify whether customer adoption of energy efficiency measures due to new rebates and tax credits in the IRA has been incorporated into PacifiCorp's load forecast. 4b) Please detail which segments of the industrial and commercial sector account for the 20% increase in load forecast, as mentioned on the October PIM. What supporting analysis has PacifiCorp used to justify that increased projection? 5) Supply side resource adjustments: Please detail which sections of the IRA have been incorporated into the updated supply side table, by section number. 6) Inflation Reduction Act: Please detail any other provisions of the IRA that PacifiCorp intends to include in modeling assumptions. Example; Will you be considering Section 50144; DOE 1706 loans? 7) Jim Bridger fuel contract: Based on the conversation about sensitivities in the October PIM, please confirm that in the base 2023 IRP portfolio modeling, Jim Bridger

* Required fields

will be modeled without minimum take requirements, with the exception of minimum take requirements under current coal supply agreements with third parties. If this is not correct, please clarify.

PacifiCorp Response (11/28/2022):

- 1.) The Company has not finalized its reliability assessment process for the 2023 IRP, but generally expects to identify reliability resources from among all available resources.
- 2.) Coal capacity factors can be calculated from data provided on the 2021 IRP confidential data disk. The ST Cost Summary reporting provides the best representation of expected output. The MT Cost Summary reporting provides an indication of the potential range of likely output. For historical capacity factor information, please refer to PacifiCorp's FERC Form 1 reporting.
- 3.) An operational CCUS resource is required to meet all applicable EPA, federal and state emission requirements. Achieving the required emission limits may necessitate the installation of additional pollution control equipment or the use of other compliance strategies. 2023 IRP modeling will select the least-cost least-risk alternative for achieving compliance with all requirements, including all modeled options for pollution controls, CCUS and dispatch strategies as discussed in the September 1-2, 2022 public input meeting for the 2023 IRP. The Ozone Transport Rule has been discussed in public input the April, July and September public input meetings for the 2023 IRP meeting series, and OTR compliance is expected to influence portfolio outcomes. The OTR is in the process of being finalized.
- 4a.) The load forecast incorporates impacts resulting from new or updated tax credits for customer sited small scale renewables (sec. 13102, 13301, 13302) and tax credits for electric vehicles (sec. 13401, 13402). Customer adoption of energy efficiency measures due to new IRA tax credits is currently not included in the load forecast. Future energy efficiency adoption will be assessed via the Conservation Potential Assessment.
- 4b.) The Company does not produce its load forecast at the segment level and individual customer information is highly confidential and commercially sensitive. The Company prepares individual forecasts, based on input from the customer and information provided by the Company's Regional Business Managers. These forecast are created for a small number of the very largest industrial and commercial customers. These individual forecast are included since specific knowledge of the customers future plans provide enhanced information not available in state-level economic projections and historical load.
- 5.) There are no IRA components included in the SST table construction costs presented at the 2023 IRP public input meeting series, as the potential cost offsets are dependent on dispatch or related to the accounting and tax treatment over the life of the asset, and are thus not related to the construction costs thus far. The variable cost impacts associated with the PTC, and annualized fixed cost recovery impacts associated with the ITC will be identified at a future meeting.
- 6.)The Inflation Recovery Act is a comprehensive bill that extends beyond electric utilities. The supply-side resource table in the 2023 IRP focuses on sections 45 and 45Y relating to production tax credits (PTC) and sections 48 and 48E relating to investment tax credits (ITC). Any facility owned by the taxpayer (1) which is used for the generation of electricity, (2) which is placed in service after December 31, 2024, and (3) for which the greenhouse gas emissions rate is not greater than zero, is eligible for the PTC under section 45Y or ITC under section 48E. ITC benefits were extended to energy storage property. Pending further guidance from the U.S. Treasury and/or the Internal Revenue Service, the IRP assumes electric generation facilities using wind, solar, nuclear, hydrogen and geothermal are eligible for PTC or ITC. Section 45Q relates to tax credits for CCUS resources and is also included in the IRP. Section 50144; DOE 1706 loans are noted but beyond the scope of the 2023 IRP modeling, so these financing provisions are not included.

With this understanding, appropriate IRA credits are applied to resources to reflect PTC or ITC benefits.

The load forecast was updated to include Private Generation and Electric Vehicle forecasts to reflect the IRA. Private generation included the extension of the residential clean energy credit, and extension nonbusiness energy property credit in the IRA. Electric vehicle tax credit was considered in the electric vehicle forecasts. The CPA assessment based on load

* Required fields

forecast, incorporated new energy efficiency home credit, and energy efficient commercial buildings deduction are benefits of the IRA.

7.) PacifiCorp's base 2023 IRP portfolio modeling will not include a minimum take requirement for Jim Bridger beyond the existing agreements with third parties.

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