

# 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	2023-04-27
*Name:	William Malcolm	Title: Mr.
*E-mail:	wmalcolm@aarp.org	Phone: (202) 746 - 7590
*Organization:	AARP	
Address:	601 E Street NW	
City:	Washington	State: WA
		Zip: 20049

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.

All

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.

TO: ROCKY MOUNTAIN POWER/PACIFICORP FROM: AARP Wyoming and AARP Utah RE: Draft Integrated Resource Plan Comments April 28, 2023 AARP provides these initial comments consistent with the schedule set forth in the stakeholder process and various state dockets. AARP has offices in all states in which the company operates. AARP members are focused on dependable, affordable, and sustainable utility services. Many are on low- or fixed-incomes. and struggle to make ends meet especially given the high inflation in utility, drug, and food prices. We urge the company to make the following changes listed below before filing with the regulatory commissions. We ask that RMP disclose in the IRP the short term retail rate increase impact to be shown per year for the IRP. Vague promises of cost savings over 30 year time frames are not enough. What kind of rate increase filings can we expect due to the IRP for each year and for each customer class will be needed to implement the plan? AARP supports the comments of other parties including providing a business as usual plan alternative and a plan alternative that allows modelling of all resources including those fired by natural gas, by hydrogen, etc. Further, we urge Federal infrastructure dollars be used to supplant any ratepayer funding for hydrogen technologies, transmission spending, storage projects, experimental nuclear power plant projects and the like. DOE has \$63 billion to award and is managing \$478 billion. RMP should apply to DOE to fund as much of its eligible spending as possible. This includes the Wattsmart battery project and the Terra Power advanced nuclear technology plants. AARP has successfully pushed for this as an alternative in many states including New York where utilities avoided \$288 million in rate increase requests by using Department of Energy dollars instead of ratepayer dollars. Also, the impacts on reliability (if any) of shuttering existing power plants prematurely should be delineated. AARP has found that other states (Indiana, California, New York, Texas) are now having reliability issues due to existing power plants closing before new ones (and

\* Required fields

associated transmission lines) are on line. This is due to a number of factors, but it is a valid concern. While AARP supports the transition to sustainable technologies, we need to ensure this is done in a manner that protects customers from rate shocks or reliability problems. This is especially true for new or experimental technologies like nuclear which historically have been prone to delays. Finally, while not part of the IRP per se, AARP does not support RMP/Pacificorp joining a regional transmission organization like SPP or CAL ISO due to concerns over rate impacts, reliability, loss of state regulatory control, and many other concerns. In summary, RMP should revise the IRP to show the retail rate impact of its preferred plan and disclose how it compares with other alternatives such as the business as usual scenario, allowing options like natural gas and hydrogen plants to be considered, etc. Most importantly, RMP should apply to DOE to use Federal funds for as much of the spending as possible including new transmission lines, new experimental nuclear technologies, and storage projects. Finally, AARP does not support RMP joining an RTO. We appreciate the opportunity to comment. (sent to- IRP@Pacificorp.com and uploaded to <https://csapps.pacificpower.net/public/stakeholder-feedback-form>)

---

**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.

TO: ROCKY MOUNTAIN POWER/PACIFICORP FROM: AARP Wyoming and AARP Utah RE: Draft Integrated Resource Plan Comments April 28, 2023 AARP provides these initial comments consistent with the schedule set forth in the stakeholder process and various state dockets. AARP has offices in all states in which the company operates. AARP members are focused on dependable, affordable, and sustainable utility services. Many are on low- or fixed-incomes. and struggle to make ends meet especially given the high inflation in utility, drug, and food prices. We urge the company to make the following changes listed below before filing with the regulatory commissions. We ask that RMP disclose in the IRP the short term retail rate increase impact to be shown per year for the IRP. Vague promises of cost savings over 30 year time frames are not enough. What kind of rate increase filings can we expect due to the IRP for each year and for each customer class will be needed to implement the plan? AARP supports the comments of other parties including providing a business as usual plan alternative and a plan alternative that allows modelling of all resources including those fired by natural gas, by hydrogen, etc. Further, we urge Federal infrastructure dollars be used to supplant any ratepayer funding for hydrogen technologies, transmission spending, storage projects, experimental nuclear power plant projects and the like. DOE has \$63 billion to award and is managing \$478 billion. RMP should apply to DOE to fund as much of its eligible spending as possible. This includes the Wattsmart battery project and the Terra Power advanced nuclear technology plants. AARP has successfully pushed for this as an alternative in many states including New York where utilities avoided \$288 million in rate increase requests by using Department of Energy dollars instead of ratepayer dollars. Also, the impacts on reliability (if any) of shuttering existing power plants prematurely should be delineated. AARP has found that other states (Indiana, California, New York, Texas) are now having reliability issues due to existing power plants closing before new ones (and associated transmission lines) are on line. This is due to a number of factors, but it is a valid concern. While AARP supports the transition to sustainable technologies, we need to ensure this is done in a manner that protects customers from rate shocks or reliability problems. This is especially true for new or experimental technologies like nuclear which historically have been prone to delays. Finally, while not part of the IRP per se, AARP does not support RMP/Pacificorp joining a regional transmission organization like SPP or CAL ISO due to concerns over rate impacts, reliability, loss of state regulatory control, and many other concerns. In summary, RMP should revise the IRP to show the retail rate impact of its preferred plan and disclose how it compares with other alternatives such as the business as usual scenario, allowing options like natural gas and hydrogen plants to be considered, etc. Most importantly, RMP should apply to DOE to use Federal funds for as much of the spending as possible including new

\* Required fields

transmission lines, new experimental nuclear technologies, and storage projects. Finally, AARP does not support RMP joining an RTO. We appreciate the opportunity to comment. (sent to- IRP@PacifiCorp.com and uploaded to <https://csapps.pacificpower.net/public/stakeholder-feedback-form>)

---

**PacifiCorp Response (6/2/23):**

The 2023 IRP filing on May 31, 2023, selected the preferred portfolio after substantial analysis based on lowest cost and lowest risk. As such, this portfolio is in the interest of customers and stakeholders. The action plan described in Chapter 10 reflects specific actions the company will address over the next 2 to 4 years. The 2023 IRP is a long-term plan and not a rate-making process. Rate-making processes are significantly informed by state allocations which are an outcome of the multistate planning process and not the IRP, for example. While specific measurements such as present value revenue requirement (PVRR) can indicate systemwide impacts on magnitude and direction of costs, the IRP does not perform a rate analysis, nor does it look at rate analysis by customer class in each of the company's six states. PVRR is analyzed primarily in Chapter 9 of the 2023 IRP and is measured relative to the preferred portfolio. The company appreciates the comments provided. With regard to grants, the Company has already submitted multiple applications for funds being made available by the DOE under initiatives such as the Grid Resilience and Innovation Partnerships (GRIP) Program. Additional applications are in process, and the Company continues to monitor a pipeline of funding opportunities from various federal and state agencies.

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

Thank you for participating.