

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 2024-05-03

*Name: Katie Chamberlain

Title: _____

*E-mail: katherine@renewablenw.org

Phone: _____

*Organization: Renewable Northwest

Address: _____

City: _____

State: _____

Zip: _____

Public Meeting Date comments address: 05-02-2024

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.

Distributed Generation Study

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.

At the May 2 public input meeting, PacifiCorp and its consultant DNV discussed the methodology and assumptions behind the distributed generation (DG) study. The goal of the study is to estimate the market potential for DG resources by customer segment and by state across the 20-year planning horizon. The study uses three different scenarios: a base case, a low adoption scenario, and a high adoption scenario. It's important that the forecast is as accurate as possible given that the results will inform the 2025 IRP. Meeting participants also discussed the need to ensure that the low, base, and high DG adoption scenarios actually presented different possible futures, and PacifiCorp reiterated that the high case should result in materially higher adoption rates than the base case. It is unclear if the current assumptions will have that effect. RNW is following up on a few of the questions we posed in the meeting to better understand some of the assumptions behind the study. Why did DNV/PacifiCorp choose to use the average of the 'conservative' and 'moderate' NREL ATB cost forecasts for the base DG adoption case? NREL's 'moderate' forecast is the expected level of technology innovation, which could be a more appropriate assumption for the base case. The DNV consultant suggested that he could connect with PacifiCorp to provide documentation on the selection of these cases, which we would appreciate. Why did DNV/PacifiCorp choose to use the 'moderate' NREL ATB cost forecast for the high DG adoption case? It may be more appropriate to use NREL's 'advanced' forecast for this scenario to sufficiently capture expected adoption levels if technology costs decline more rapidly. As above, we would appreciate any further reasoning or documentation on the selection of this cost forecast. Why did DNV/PacifiCorp use the base case assumption (applicable state and federal incentives based on current legislation) for the high DG adoption scenario, instead of assuming a higher level of incentives or an extension of existing incentives?

* Required fields

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.

PacifiCorp Response (5/23/24):

Thank you for your comments and feedback on the Distributed Generation (DG) Study. PacifiCorp agrees that it is important to develop the most accurate forecast for the 2025 IRP ensuring that variables informing DG adoption are accurately represented in our modeling. To the extent practical, DNV/PacifiCorp is working to improve modeling by incorporating the most recent adoption data, export rates, and relevant stakeholder feedback into base, low, and high cases in the modeling approach. Additionally, during the upcoming June 26-27th public input meeting we will share the study's specific assumptions for each case based on feedback from stakeholders. PacifiCorp responds as follows to the questions raised by RNW:

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- **Stakeholder Question 1:** RNW is following up on a few of the questions we posed in the meeting to better understand some of the assumptions behind the study. Why did DNV/PacifiCorp choose to use the average of the conservative and moderate NREL ATB cost forecasts for the base DG adoption case?
 - **Response 1:** DNV reviewed the cost forecasts in the NREL ATB data and found that the moderate cost decline forecast for solar PV was more aggressive than DNV's internal national cost models and what the market has experienced historically (~10 years). Recent cost increases or a general leveling of cost declines also adds to this assumption. The technology cost forecast used in the DG study base case has a ~35% price decrease through 2035, as opposed to the ~50% decrease forecasted in the NREL moderate case.
 - **Question 2:** Why did DNV/PacifiCorp choose to use the NREL ATB cost forecast for the high DG adoption case?
 - **Response 2:** DNV/PacifiCorp used the moderate NREL ATB cost forecast for the high scenario to maintain consistency with the other scenarios. The high scenario in this study is more focused on other market factors that could stimulate market growth and adoption, which are contained in the model's adoption parameters. These factors are changed in the high scenario to reduce market barriers over time and simulate the effects of a wide array of factors, which could also include components of technology cost. Moving forward, DNV and PacifiCorp will evaluate whether to incorporate a more aggressive NREL ATB cost forecast to inform the high scenario; this may be represented by using either advanced ATB cost forecast or a blend of the advanced and moderate ATB cost forecasts.
 - **Question 3:** Why did DNV/PacifiCorp use the base case assumption (state and federal incentives based on current legislation) for the high DG adoption scenario, instead of assuming a higher level of incentives or an extension of existing incentives?
 - **Response 3:** PacifiCorp elected to use the base case assumption for federal and state tax incentives for all scenarios as these assumptions are not easily predictable and challenging to develop trends around. Therefore, the company believes it is more appropriate to look at other variables to inform the high and low case as these variables seem more likely to change in the near-term.
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Please submit your completed Stakeholder Feedback Form via email to IRP@PacifiCorp.com

Thank you for participating.

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