

# PacifiCorp - Stakeholder Feedback Form

## 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 call, 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 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 post appropriate feedback on the IRP website based on your selection below.

Date of Submittal 2024-07-19

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Title:

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\*Organization: Wyoming Office of Consumer Advocate

Address: 2515 Warren Ave, Suite 304

City: Cheyenne

State: WY

Zip: 82002

Public Meeting Date comments address: 07-18-2024

Check here if 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.

Chehalis natural gas plant, Washing Climate Commitment Act cap-and-invest program, modeling scenarios

Check here if you 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 July 18, 2024 IRP meeting PacifiCorp stated that for all scenarios that will be modeled, emissions from the Chehalis natural gas plant will incur the forecasted cost of allowances under the cap-and-invest program established in the Climate Commitment Act (CCA) passed by the Washington Legislature in 2021. Given that several states have already rejected the inclusion of these costs in rates, and that PacifiCorp has challenged these costs in court, we find it concerning that the Company's modeling strategy does not include any scenarios in which Chehalis is modeled without the cost and dispatch impacts of the cap-and-invest program.

**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.

We would recommend the Company provide resource selections modeled without the cost and dispatch impacts of the WA CCA cap-and-invest program on the Chehalis natural gas plant.

PacifiCorp Response (8/1/2024):

Thank you for your recommendation. We have not modeled Chehalis without considering the cost and dispatch impacts of the WA CCA cap-and-invest program. Notwithstanding that certain commissions have declined to allow the company to recover these cost, the company continues to incur these costs. The company is monitoring ballot measures that could

\* Required fields

appeal the CCA. Chehalis provides capacity to the system and demonstrated cost-effectiveness in the 2023 IRP.

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

Thank you for participating.

\* Required fields