

# 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 2024-11-18

\*Name: Kevin Emerson

Title: Director of Building Efficiency

\*E-mail: irp@pacificorp.com

Phone: (801) 608 - 0850

\*Organization: Utah Clean Energy

Address: 215 S. 400 E.

City: Salt Lake City

State: UT

Zip: 84129

Public Meeting Date comments address: 09-25-2024

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.

Baseline building energy code assumptions in the 2025 IRP Conservation Potential Assessment

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.

According to the presentation slides used at the 2025 Integrated Resource Planning Public Input Meeting on September 25, 2024, AEG is using an inaccurate code baseline for residential new construction in Utah. Slide 14 indicates that AEG is using the 2015 IECC as representing Utah's energy code baseline for residential construction in the state (see Note 1). While Utah's residential energy code was updated by the Utah Legislature in March 2024 (see Note 2), the legislation maintained the numerous weakening amendments in Utah's residential energy code, which has been previously recognized as equivalent to the 2009 IECC. As per U.S. Department of Energy's Status of Energy Code Adoption map, despite the 2024 legislation, Utah's residential energy code is still recognized as equivalent to the 2009 IECC (see Note 3). The U.S. Department of Energy estimates that Utah's residential energy code is 29% less efficient than the 2021 IECC, the most recent model energy code. Using the correct residential energy code baseline will impact the cost-effectiveness of new homes programs and more accurately reflect the potential energy savings achievable through Rocky Mountain Power's New Homes rebate 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.

AEG's Conservation Potential Assessment modeling processes should be adjusted to reflect the 2009 IECC as Utah's baseline residential energy code to capture the

\* Required fields

realistic level of energy saving potential associated with utility-sponsored new homes rebate programs.

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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.

**PacifiCorp Response:**

Thank you for providing the information. Applied Energy Group (AEG) reviewed the US Department of Energy webpage that Utah Clean Energy provided during the September 2024 Public Input Meeting, as well as text from Utah’s House Bill 0518, passed in March 2024. AEG verified that the building envelope parameters now being used in the CPA are “consistent with the latest Utah code *plus amendments*.”

AEG noted that they primarily lean on the insulation and fenestration requirements in the component tables and other key parameters such as duct insulation/air leakage requirements for residential measures. The commercial codes tend to have much more complicated rules regarding controls and measure eligibility in new construction but were also verified against the latest Utah code plus amendments.