

# 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 2025-11-12

\*Name: Phillip Russell

Title:

\*E-mail: prussell@jdrslaw.com

Phone: (801) 363 - 6363

\*Organization: Utah Association of Energy Users

Address: 545 East Broadway

City: Salt Lake City

State: UT

Zip: 84102

Public Meeting Date comments address: 11-12-2025

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.

Planned treatment of large loads & Utah Senate Bill 132

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.

With regard to the treatment of large loads and UT SB 132, PacifiCorp indicated in the Nov. 12, 2025 public input meeting that it would include "committed large loads" in the load forecast along with "dedicated proxy resources that enable them." Please provide responses to the following follow-up questions: (1) When is a load "committed" for purposes of IRP modeling (contract execution, contract effective date, etc.); (2) will it be assumed that the "dedicated proxy resources" that enable the committed large loads will be sufficient to serve all large load needs in all hours and, if not, what assumptions will be made about the use of system resources and/or market resources to serve those large loads?; and (3) what assumptions will be made about the ability of the dedicated proxy resources to be utilized to serve system load when not needed to serve the committed large load?

**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](mailto:IRP@PacifiCorp.com)

Thank you for participating.

\* Required fields

1. Generally, large loads are considered to be “committed” and able to be included in the IRP forecast at the time that the contract is formalized by both parties. There are practical limitations on loads being included in the current IRP cycle to allow time for the modeling.
2. The dedicated proxy resources will be selected endogenously by the model to ensure enough capacity is built to serve the committed large load. The capacity requirement will be based on each resource type’s capacity contribution and will be modeled following the methodology to model WRAP compliance in the 2025 IRP for various jurisdictions (consider committed load a jurisdiction in this sense). These resources will be dispatched endogenously by the model and there is no guarantee that enough capacity also means all hours of energy will be met with these resources. The system will be required to balance on an hourly basis, and all mechanisms for system balancing will apply to the committed loads as well.
3. The model will endogenously dispatch and balance the system with all available resources in a given portfolio. If there are hours where the resources dedicated to serve committed large loads can generate more energy than required, endogenous decisions will be made about storing energy, exporting to other parts of the system or curtailing these resources. As with all other load and resource considerations in IRP modeling, these factors are reported on a portfolio level for various metrics including market activity, energy not served, emissions, and present value revenue requirement. Relative impacts at varying volumes of large meter load are considered in portfolio sensitivities.