PacifiCorp - Stakeholder Feedback Form

2027 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 2027 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 11/25/2025

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Title:

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*Organization: Sierra Club; Renewable Northwest

Address: 2101 Webster Street, Suite 1300

City: Oakland State: CA Zip: 94612

Public Meeting Date comments address: 11/12/2025

☐ 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.

- 2025 IRP Update – Jurisdictional Modeling

☐ 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 November 12, 2025 public input meeting, PacifiCorp representatives described a planned jurisdictional approach for the 2025 IRP Update. Sierra Club and RNW understand that PacifiCorp intends to conduct at least four portfolios:

Portfolio 1: a system resource adequacy run that selects the portfolio of resources necessary for system RA compliance, regardless of state policies;

Portfolio 2: a system resource adequacy run that incorporates Oregon's exit from coal as required by SB 1547;

Portfolio 3: an OR jurisdictional model that includes HB 2021 and small-scale compliance obligations;

Portfolio 4: a WA jurisdictional model that includes CETA and compliance and the SCGHG.

Sierra Club and RNW are generally supportive of this approach for the 2025 IRP Update and expect it can be iterated upon and refined for the 2027 IRP. We provide two pieces of feedback for the 2025 IRP Update:

* Required fields

First, PacifiCorp should include B2H in all portfolio runs described above. By including B2H, we mean that B2H should be available in the model to serve load in PACW with resources located in PACE, up to 800 MW, and similarly be available to serve PACE loads with PACW-located resources, up to 300 MW. While this recommendation has been previously made, we stress that excluding B2H will undermine credibility of the final portfolio, as the model will be severely limited in its ability to site resources in PACE that may serve PACW needs and the purpose of B2H, which has been planned for decades, is to address this very transmission constraint. Even if PacifiCorp chooses to run the four portfolios described above without B2H, it must provide a counterfactual in which B2H is activated in the model.

Second, PacifiCorp should enforce reliability requirements at the system level in PLEXOS, i.e., across PACW and PACE, while simultaneously enforcing transmission constraints. This is necessary and appropriate because the PacifiCorp system is operated as a single integrated balancing authority. Systemwide resource adequacy enforcement ensures that Portfolio 1 accurately reflects the true baseline resource needs. State-specific portfolios should then build on this baseline by adding only those incremental resources required for policy compliance.

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
Thank you for participating.

PacifiCorp Response:

B2H will be able to serve PACW load via PACE resources. Acquisition of BPA redirects from Longhorn will not be assumed in the base modeling but will be included as a sensitivity.

Regarding the second recommendation, PacifiCorp is considering approaches to reliability for modeling efforts going forward. As discussed in the November 12, 2025, public input meeting, approaches that would “layer on” additional resources in response to state requirements were seen unfavorably in prior modeling efforts, where the “addition” of state requirements has the potential to drive different optimal resource selections of system resources once state requirements are applied. As expressed in the 2027 IRP public meeting series, a systemwide modeling baseline may be used for cost and emissions differentials, for example, but may have significantly less meaning regarding the selection and allocation of resources. PacifiCorp’s position is that any competitive approach must avoid the implied favoritism to any jurisdiction, should mitigate the risk of overbuild, and allow for each jurisdiction’s ideal selections to be fairly represented in final portfolios. PacifiCorp has not at this point received a recommendation that describes how this can be done procedurally in a way that would displace the current selection and integration methodology. However, PacifiCorp’s IRP team is keenly interested in ongoing improvements and welcomes ideas and feedback.

* Required fields