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 2025-12-22

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*Organization: rPlus Energies, LLC

Address: 201 S. Main St., Ste. 2100

City: Salt Lake City State: UT Zip: 84111

Public Meeting Date comments address: _____ ☐ 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.

Pumped Storage Hydro in IRP

☒ 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.

rPlus Hydro, LLC (\u001CrPlus\u001D), a subsidiary of rPlus Energies, LLC, offers the following comments regarding treatment of pumped hydro energy storage, or pumped storage, in the 2027 PacifiCorp IRP update process. rPlus is a leading developer of new pumped storage hydro capacity in the United States and is currently developing projects within PacifiCorp\u0019s service territory. rPlus strongly supports the inclusion of pumped storage in the evaluation of resource options to meet PacifCorp needs for reliable, affordable, and environmentally sustainable power. Pumped storage offers the following strong attributes as a resource option: 1. Unmatched useful life 2. Highly competitive capital cost at long duration storage (8+ hours) 3. No degradation of storage capacity or efficiency through cycling 4. Ability to contribute real inertia for grid stability 5. Higher domestic content 6. Technological diversification rPlus supports PacifiCorp\u0019s use of a 100-year design life assumption for pumped storage. This is validated by the longevity of the existing fleet in the US and worldwide and by the fact that the existing pumped storage plants in the United States reaching the end of their initial 50-year license period have gone back to FERC for license renewals with 40- to 50-year terms. rPlus also supports PacifiCorp\u0019s intention to assume applicability of the Investment Tax Credit for energy storage, as reaffirmed in Public Law 119-21, signed into law in July 2025. rPlus would additionally note that new pumped storage plants would likely meet the threshold for domestic content to qualify for the associated 10% bonus ITC. Thus, for projects located in Energy Communities (garnering another 10% bonus), the total ITC eligibility is likely to be 50%. Two of the most advanced projects in rPlus\u0019 portfolio are located in PacifiCorp service territory, and both are the most advanced in development of any new pumped storage projects proposed in PacifiCorp\u0019s service territory. Both are located in Energy Communities. These projects are briefly described below. 1. Seminoe Pumped Storage is a 972 MW project with 12 hours of full-output duration, located in Carbon County, Wyoming. The project is

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currently in the late Draft EIS phase in FERC licensing. A Final EIS is expected in spring 2026, with license issuance expected in July 2026. The planned point of interconnection for this project is the Aeolus Substation, which is the origination point of Gateway South and the hub of PacifiCorp wind energy resources. From this location, Seminoe Pumped Storage can also assist with the integration of Utah solar, help make more efficient use of Gateway transmission lines, as well as provide firm, dispatchable power, inertia and other ancillary services for grid support. It would also integrate well with any future nuclear energy developed in Wyoming. Seminoe\u0019s earliest potential in-service date is 2033. 2. Oquirrh Pumped Storage is a 500 MW project with 8 hours of full-output storage duration, located in Salt Lake County. This closed-loop project is uniquely located in the heart of PAC-East\u0019s load center and has a signed interconnection agreement with PacifiCorp going into the Oquirrh Substation. Another outstanding attribute of this project is that it is one of few proposed pumped storage projects that does not require a license from FERC, which affords a streamlined permitting process. Oquirrh\u0019s earliest potential in-service date is 2033. A third rPlus pumped storage project that may be relevant to PacifiCorp\u0019s system, although is not located within PacifiCorp service territory, is White Pine Pumped Storage. This is a 1000 MW x 8 hour closed-loop project located in eastern Nevada. White Pine has the outstanding characteristic of extremely high head (greater than 2,000 feet), which affords lower cost per kW and a smaller footprint. White Pine is advanced in the FERC licensing process, with its Final License Application filed with FERC in 2023 and license issuance expected in 2027. The project has a signed interconnection agreement with NV Energy at Robinson Summit. If the Cross-Tie transmission project is built, connecting PacifiCorp\u0019s Clover Substation with Robinson Summit, White Pine will have more direct relevance to PacifiCorp\u0019s system. White Pine\u0019s earliest potential in-service date is also 2033. In closing, rPlus supports the longstanding and continuing inclusion of pumped storage hydro in PacifiCorp\u0019s resource planning and appreciates the application of realistic assumptions when modeling the inclusion of this well-established technology. With some of the most developmentally advanced and strategically located new US projects located in PacifiCorp service territory, rPlus believes that pumped storage hydro can play a critical supporting role in PacifiCorp\u0019s future resource portfolio.

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:
Thank you for your feedback. PacifiCorp is committed to evaluating opportunities to procure new pumped storage resources to economically and reliably serve its customers while also achieving emissions reduction targets as required by state and federal regulatory obligations. PacifiCorp will continue to model new proxy pumped storage resource options in its 2025 IRP Update and 2027 IRP analyses. Regarding specific projects, the company is always interested in bids into its Request for Proposals processes that exceed IRP expectations.

PacifiCorp remains committed to using the best available data to represent the costs and characteristics of new proxy pumped storage resources in its 2025 IRP Update and 2027 IRP including appropriate state and federal tax credits at the time each analysis is conducted. In the 2025 IRP Update PacifiCorp will continue to use NREL's 2024 Annual Technology Baseline (ATB) to represent the costs and characteristics of new proxy resources options, where applicable. PacifiCorp plans to use the latest version of NREL's ATB if one becomes available in an appropriate timeframe for use in the 2027 IRP. If an updated NREL ATB is not available for use in the 2027 IRP, PacifiCorp will use other acceptable,

publicly available data sources to model new proxy resource options. As always, PacifiCorp welcomes suggestions for specific data sources to consider reflecting the costs and characteristics of new proxy resource options.

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