# 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: 1/16/2026


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Public Meeting Date comments address: 12/17/2025

☐ Check here if not related to specific meeting

List additional organization attendees at cited meeting: Kevin Emerson

***IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Conservation Potential Assessment – PacifiCorp 2027 Demand-Side Resource Potential Assessment Final Workplan

☐ 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.

ICF published a Final Workplan for "PacifiCorp 2027 Demand-Side Resource Potential Assessment."

According to the CPA workplan, "Previous studies have calculated costs within the potential study as a percentage of measure incremental cost. As part of this review, ICF will work with PacifiCorp to determine whether an alternate method (e.g., $/kWh saved) may be a better representation of on-the-ground experience."

> We agree with ICF's plan, and we believe that this is a better cost metric for DSM since it aligns with how RMP's DSM program costs are reported in the cost-effectiveness sections of its annual reports and it aligns with how the cost of supply side energy resources are reported in the IRP.

In this workplan, ICF states that supply curves will incorporate "updated forecasts" [*pg. 11*].

> Please provide information on how these updated forecasts will incorporate information about transportation electrification, building electrification, and new large loads.

The workplan discusses that ICF will analyze multiple scenarios: "For this study, the ICF Team will develop up to three (3) distinct Class 1 and/or Class 2 DSM potential scenarios in collaboration with PacifiCorp. The ICF Team and PacifiCorp discussed scenarios during the project kickoff meeting and anticipate identifying scenarios after initial results are in and stakeholders have an opportunity to provide feedback." [*Pg. 10*]

* Required fields

> Given that DSM programs are required to be cost-effective, we would like to see a "high DSM scenario" reflecting DSM levels of 2% of PacifiCorp's retail sales, a "moderate DSM scenario" reflecting 1.5% of retail sales, and a "business as usual DSM scenario", reflecting an average % of retail sales from the past 3-5 years based on actual DSM savings reported by the company.

The workplan addresses evaluating non-energy benefits and qualitative benefits of DSM resources. In the section ***Characterize Impacts and Implementation Costs***, the workplan states, "Where applicable and available, non-energy benefits (e.g., distribution system value) will be transparently used to offset costs to represent this benefit in the IRP model decision logic." [*Pg. 8*] In the section ***Estimate Program-Level Potential***, the workplan states, "In addition to estimating potential, the analysis will draw on Brattle's experience to highlight qualitative benefits of Class 1 and Class 3 DSM resources. These may include avoiding interconnection delays, mitigating tariff and trade risks, and enabling scalable flexibility, which are key advantages in today's uncertain regulatory and economic environment." [*Pg. 8*]

> Non-energy benefits and qualitative benefits of DSM programs are critically important to fully evaluate the benefits of DSM. We would like the opportunity to review the full list of non-energy benefits that Brattle and ICP plan to evaluate. Additionally, we request that detailed results of these subsequent analyses are shared with stakeholders as they are available. An accounting of the interaction between non-energy benefits and demand response programs can provide added information about the complete value streams due to each demand response program.

The workplan addresses income stratification of DSM programs in the section ***Characterize the Market***. Specifically, it states, "[T]he ICF Team will use the income-level segmentation from the energy efficiency analysis to expand the residential assessment of Class 1 and Class 3 DSM resources. This expansion will allow for the investigation of variations in price elasticities across income groups. This approach will help PacifiCorp better understand load flexibility opportunities in disadvantaged communities and support targeted, effective, and equitable program design." [*Pg. 7*]

> Up to this point, DSM programs have not been designed to benefit disadvantaged communities. We see this as a great opportunity to deliver the benefits of DSM to those who would benefit from it most. We support ICF's proposal to evaluate opportunities for innovations in DSM program implementation to serve low-income customers, and we request that the full results of this analysis are shared with stakeholders.

"**Define Program List**. The ICF team will collaborate with PacifiCorp to develop a comprehensive list of demand response and load flexibility program options, beginning with those characterized in the previous CPA. To ensure credible results, the analysis will **focus on programs with robust pilot or operational experience that support reliable assumptions for load impacts and participation**. The analysis will also explore an expanded Class 1 DSM portfolio, including emerging opportunities such as **bidirectional EV charging** and **flexible load** or **on-site generation from data centers**, both of which may become increasingly viable within the study horizon given development trends in PacifiCorp's service areas." [*Pg. 7-8*]

> We support the continued inclusion of "emerging opportunities" in addition to more mature programs, and we request that the CPA include results of the analysis of emerging opportunities. These results will be valuable for stakeholders.

**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.

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated.

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Please submit your completed Stakeholder Feedback Form via email to IRP@Pacificorp.com
Thank you for participating.

**PacifiCorp Response:**

1. Measure cost feedback
   Thank you for your input on this. PacifiCorp and ICF will be exploring the viability of this alternate method during this CPA cycle.

2. Updated forecasts
   The PacifiCorp Load Forecasting team provides projected sales data, distributed generation, EV forecast assumptions, building electrification assumptions (including SAE model outputs), and other forecast drivers (e.g., GDP, customer growth, etc.) separated by state and sector as part of the data request. This typically includes large loads, like data centers, separated out as well. An updated forecast from the Load Forecasting team is anticipated in June 2026. This will include any additional updated input streams that ICF will incorporate into the baseline model, to be reflect in the updated potential.

3. Scenarios
   PacifiCorp will be proposing scenarios for the 2027 IRP in subsequent public input meetings and will lay out options for incorporating DSM components, along with other variables. Since the amount of cost-effective DSM is determined as an output of PLEXOS, rather than as an input, the chosen scenarios will more likely need to vary DSM costs or other variables, instead of forcing fixed quantities.

4. Non-energy impacts
   Utah does not include non-energy impacts in its cost effectiveness guidance for DSM programs. Notwithstanding, PacifiCorp and ICF conducted a literature review in the 2023 CPA in an effort to quantify NEIs for Demand Response resources. While there were several qualitative findings, the team did not find anything defensible to warrant quantifying these impacts. At that point, ICF had consulted with The Brattle Group as well, who confirmed the findings. This review was published as Appendix K in the 2023 CPA report, Volume 2.[1] This was carried forward into the 2025 CPA the team continued to de-rate Class 1 (DR) costs by 10% in Washington to reflect these non-quantifiable NEIs. The 2027 CPA work plan does focus on highlighting qualitative benefits and incorporating quantitative values where they are readily available and the values that will be used and/or the findings of a refreshed review will be documented in the 2027 CPA report.

5. Income segmentation
   Thank you for the feedback.

6. Emerging technologies
   Thank you for the feedback.

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[1] Available online: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023-irp/2023-irp-support-studies/cpa/PacifiCorp_DSM_Potential_Report_Vol_2.pdf

* Required fields