

# 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 Feb 19, 2026

\*Name: Logan Mitchell

Title: Climate Scientist and Energy Analyst

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Phone: \_\_\_\_\_

\*Organization: Utah Clean Energy

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Public Meeting Date comments address: \_\_\_\_\_  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.

- Analysis of accelerated procurement in 2025 IRP Update draft

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.

In the Utah Public Service Commission's (PSC) Oct 17, 2025 Order<sup>1</sup> on Utah Clean Energy's Request for Expedited Investigatory Docket and Agency Action, the Commission stated:

"The PSC and stakeholders do, nonetheless, have a legitimate and compelling interest in ensuring RMP acts prudently in evaluating opportunities to procure resources with significant tax benefits. Therefore, the PSC directs RMP to include, in its next IRP Update, a thorough description of the analysis and actions it undertook to respond to the changed circumstances regarding the soon to be expiring tax credits."

In a Stakeholder Feedback Letter from Nov 20, 2025, Utah parties requested the following<sup>2</sup>:

- Create a model sensitivity that allows for endogenous selection of tax-advantaged wind and solar resources (with or without energy storage) with Commercial Online Dates in the next four years.

The 2025 IRP Update draft posted on January 30, 2026, does not appear to contain a "a thorough description of the analysis and actions [PacifiCorp] undertook to respond to the changed circumstances regarding the soon to be expiring tax credits" as the Utah Public Service Commission directed. Furthermore, there is no indication that PacifiCorp plans to conduct a model sensitivity as requested by Utah Parties in our Nov 20, 2025 Stakeholder Feedback Form. We therefore request a response to the following questions:

- 1) If a thorough description of the analysis and actions to evaluate accelerated procurement of tax advantaged resources was included in the 2025 IRP Updated draft, please indicate where it is located in the document.
- 2) If the analysis to evaluate accelerated procurement of tax advantaged resources is still being conducted and will appear in the final 2025 IRP Update, please explain why it was not included in the draft so that stakeholders could provide timely feedback.
- 3) Please share any model results that evaluated the economic impact of accelerated procurement of tax advantaged renewable energy resources with Commercial Online Dates before December 31, 2029.
- 4) Please indicate if PacifiCorp plans to conduct a model sensitivity consistent with current tax policy "that allows for endogenous selection of tax-advantaged wind and solar resources (with or without energy storage) with

\* Required fields

Commercial Online Dates in the next four years” as Utah Parties requested in our Nov 20, 2025 Stakeholder Feedback Form.

- 5) If PacifiCorp does not plan to conduct a model sensitivity that is consistent with current tax policy as Utah Parties requested, please explain why.

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**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.

<sup>1</sup> Utah Public Service Commission’s Oct

17, 2025 Order: <https://pscdocs.utah.gov/electric/25docs/2503552/3423362503552o10-17-2025.pdf>

<sup>2</sup> Utah Parties Stakeholder Feedback Letter, Nov 20, 2025

[https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2027-irp/2027-irp-comments/2027.008\\_UAE\\_UCE\\_DPU\\_OCS\\_WRA\\_11-20-2025\\_with\\_response.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2027-irp/2027-irp-comments/2027.008_UAE_UCE_DPU_OCS_WRA_11-20-2025_with_response.pdf)

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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](mailto:IRP@PacifiCorp.com)

Thank you for participating.

### **PacifiCorp Response:**

1. PacifiCorp’s response to the referenced order is provided in Appendix H of the 2025 IRP Update, filed March 31, 2026.
2. The analysis is highly dependent on information gathered through PacifiCorp’s procurement processes, which proved contemporaneous with the development of the 2025 IRP Update, only recently becoming available. PacifiCorp’s timing and approach are to ensure best available information for this analysis.
3. N/A
4. No, PacifiCorp is not conducting a model sensitivity. However, PacifiCorp’s relevant modeling assumes current tax policy.

For clarity, the order is notably broader than UCE’s original request and gives the company leeway to perform the analysis in the most useful manner available. There is no requirement in the order to perform this analysis or description via a model run. The order requires PacifiCorp to include “thorough description of the analysis and actions it undertook to respond to the changed circumstances regarding the soon to be expiring tax credits.” Furthermore, a model run would be ill-timed and inaccurate. The review PacifiCorp pursued in fulfillment of this order indicate that there is no meaningful differentiation between PTC and non-PTC resources currently available in the market. The best response to the order could not be found in an IRP Update model run. Rather, PacifiCorp surveyed the two distinct RFPs PacifiCorp recently initiated and executed resulting in actual opportunities and prices across the company’s six-state territory. This forms the basis of PacifiCorp’s analysis and description in the IRP Update, Appendix H. Both the completed analysis and all 2025 IRP Update modeling is entirely consistent with current tax-policy to the extent that there is no meaningful differentiation between PTC and non-PTC resources currently available in the market.

5. Please see the response to 4 for an explanation as to why no model run was needed for this analysis.