

# SiePacifiCorp - Stakeholder Feedback Form

## 2025 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 2025 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 2/20/2026

\*Name: Rose Monahan, Attorney

Title: \_\_\_\_\_

\*E-mail: [Rose.monahan@sierraclub.org](mailto:Rose.monahan@sierraclub.org)

Phone: 415-977-5704

\*Organization: Sierra Club

Address: 2101 Webster Street, Suite 1300

City: Oakland State: CA Zip: 94612

Public Meeting Date comments address: 1/28-29/2026

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.

- Feedback on Draft 2025 IRP Update

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.

**This feedback form and the requests herein are being submitted jointly by Sierra Club, Western Resource Advocates, Utah Clean Energy, the Green Energy Institute at Lewis and Clark Law School, Mobilizing Climate Action Together (MCAT), Renewable Northwest, and NW Energy Coalition.**

### **IRP Topic: OR and WA Coal Shares Reallocation**

At the January 2026 Public Input Meeting, a PacifiCorp representative stated that starting in 2030, the PLEXOS model assumes that the UIWC jurisdiction takes on OR and WA's coal shares, which presumably also includes the unallocated coal shares that have never been in Washington rates, amounting to approximately 1 GW of new coal resources for the UIWC jurisdiction. It was noted that this likely explained why the UIWC jurisdiction is not forecasted to acquire *any* new solar, wind, or batteries for the next 20 years.

It is unclear whether PLEXOS has selected the additional coal shares for the UIWC jurisdiction based on economics or whether the shares were automatically assigned to UIWC. If automatically assigned, this modeling assumption is inappropriate for the IRP as it inhibits the PLEXOS model from selecting the least cost, least risk mix of resources for the UIWC jurisdiction. The additional coal shares may be seen within the model as being free, which is incorrect. Moreover, rather than a resource decision, this would be a cost allocation decision being forced into the PLEXOS model. Yet, no UIWC jurisdiction has accepted larger shares of any of PacifiCorp's coal units. If the coal shares are automatically assigned to the UIWC jurisdiction, our organizations request that this constraint be removed.

On the other hand, if PLEXOS is economically selecting additional coal shares for the UIWC jurisdiction, our organizations request that PacifiCorp disclose the pricing assumptions used for the coal shares, broken down by category (e.g., fixed O&M, variable O&M, decommissioning) and receive feedback on those price inputs before finalization of the 2025 IRP Update.

\* Required fields

## **IRP Topic: Replacement of Solar Resources for Wind Resources, Reduction in Storage, Block Products**

Table 7.10 in the Draft 2025 IRP Update highlights the reduction in solar resources projected throughout the planning horizon (a reduction of nearly 4 GWs of both utility scale and small scale solar), compared to an increase in wind resources (an increase of approximately 1 GW). There is further a reduction in storage (decrease of nearly 3GW) and the addition of “block products,” but none assigned to OR or WA.

Please provide a narrative explanation for why the model would select significantly less solar and more wind, given that solar is the lowest cost resource available and has more predictable generation than wind, predictable generation that can be paired with battery storage. Additionally, please provide a narrative explanation for why the model would select renewable peaking generation starting in 2028 over a stand-alone or hybrid battery facility that would likely be more economical, even after account for the effects of the OBBBA and tariffs.

Please confirm that a constraint was used in PLEXOS to prohibit block products for the OR and WA jurisdictions. Please explain why this constraint was imposed and whether PacifiCorp has investigated clean market products that can serve OR and WA. If no clean market products have been identified as currently available, please explain PacifiCorp’s decision not to assume that clean market products will be available by 2030, particularly in light of PacifiCorp’s decision to assume that “renewable peaking resources” will be available.

## **IRP Topic: System Level Resource Adequacy Run**

The draft 2025 IRP Update indicates that a System Level Resource Adequacy Run was completed (page 59), but the results are not presented. Multiple stakeholders requested not only a system-level resource adequacy run but also subsequent modeling that would build off of that run in order to incorporate binding state policies. It is unclear whether PacifiCorp intends to produce model results that align with these requests, despite indications in IRP comments that the Company would do so in the IRP Update.

Our organizations request that PacifiCorp complete model runs as described below and in Sierra Club, et al.’s Round 2 Comments filed in Oregon PUC Docket No. LC 85, and provide the results of these runs prior to filing of the final 2025 IRP Update:

1. Baseline: system wide reliability modeling run that does not include any compliance mechanisms;
2. WRAP: a system wide model with WRAP compliance requirements applied across the entire system (while PacifiCorp has stated it intends to leave the WRAP, it remains a valid proxy for resource adequacy requirements in the interim);
3. A full system portfolio including both WRAP requirements and compliance with SB 1547;
4. A full system portfolio including WRAP requirements, compliance with SB 1547, and emission constraints to comply with HB 2021;
5. A full system portfolio including WRAP requirements, compliance with SB 1547, emission constraints, and run using the SCGHG to comply with WA requirements

The only objection we have heard for why these portfolios could not be run is that it is unclear which state policy to run first (i.e., either HB 2021 emission constraints or WA SCGHG requirements). Given the recent announcement that PacifiCorp will be selling its Washington service territory, it may no longer be necessary to model the system with CETA constraints for the 2027 IRP. For the 2025 IRP Update, we recommend that the Company run the portfolios both ways: first with an emissions constraint to represent HB 2021 requirements, followed by a subsequent portfolio including the emissions constraint *and* the SCGHG; and another set of runs that starts with the SCGHG followed by an emissions constraint.

## **IRP Topic: Variant Portfolios**

### *Hunter Retire and All Coal Retire*

In the 2025 IRP, the Retire Hunter variant portfolio replaced 1,100 MW of Hunter capacity in 2030 with over 1,100 MW of wind and solar coupled with 866 MW of storage, also in 2030. Through the end of the study horizon, 99 MW of new

\* Required fields

gas, 355 MW of energy efficiency and demand response, and over 1,400 MW of new renewables were selected. In the preliminary results for the Retire Hunter variant portfolio in the 2025 IRP Update, Hunter’s approximately 1,100 MW of capacity is replaced entirely with new gas (1,122 MW). A similar outcome is seen in the All Coal Retire variant in the 2025 IRP Update: coal is entirely replaced with gas, without any renewables, storage, geothermal, or other mix of resources. This outcome is surprising, given that the loss of federal tax credits for wind and solar would be expected to *reduce* renewable build out but not *eliminate* it.

Please explain:

- (1) Whether there were any constraints within these variant portfolios that would have limited the available replacement resources from which the PLEXOS model was able to select (e.g., a requirement that the coal units be replaced with firm capacity);
- (2) Whether the model runs took into account necessary pipelines and other major investments that would be needed to facilitate the new proxy gas, particularly in Utah where gas pipelines are not available to the Hunter and Huntington plants; and
- (3) Whether there were any material input assumption changes regarding resources, aside from the change in available tax credits, that were applied to these runs that were not applied in the 2025 IRP (e.g., a change the ELCC or capacity accreditation assigned to wind, solar, and storage; gas capital cost reductions; etc).

#### HH Price Policy Scenario

It is unclear from the Draft 2025 IRP Update whether PacifiCorp will be preparing a portfolio run under high gas, high CO2 price policy assumptions. Given that this scenario outperformed the preferred portfolio in the 2025 IRP, please complete a HH price policy scenario for the 2025 IRP Update.

#### **IRP Topic: Update on PacifiCorp Actions to Capitalize Upon Sunsetting Inflation Reduction Act Tax Credits**

The Utah Commission directed PacifiCorp to provide “a detailed explanation in its next IRP Update of the analysis and actions it undertook to evaluate and pursue any opportunities to procure needed resources that qualified for the expiring [Inflation Reduction Act] tax credits.” Dkt. No. 25-035-52, Order Dated Oct. 17, 2025. No such update is provided in the Draft IRP Update. Please provide such an update before filing the 2025 IRP Update for review and feedback from 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.

---

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

- (1) Remove constraint/assumption in PLEXOS that UIWC automatically accepts OR and WA coal shares. Make these coal shares available as resource options. Disclose assumed pricing for these coal shares in a stakeholder input meeting and receive feedback prior to finalizing cost inputs;
- (2) Provide a narrative explanation for why the PLEXOS model significantly reduced solar while increasing wind, as described above, why the model selects renewable peaking generation over alternative resources, and also explain whether block products were available for OR/WA and if not, why not, as discussed above;
- (3) Complete modeling runs that assess PacifiCorp’s system as a single whole rather than three individual jurisdictions, as detailed above, specifically by conducting portfolio runs as detailed above;
- (4) Disclose modeling assumptions, as detailed above, impacting the variant portfolios Hunter Retire and All Coal Retire;
- (5) Provide an update on PacifiCorp’s actions to capitalize upon sunseting IRA tax credits.

---

Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.

#### **PacifiCorp Response:**

#### **UIWC Assumption of OR and WA Coal Shares**

\* Required fields

PacifiCorp clarifies that there is no constraint in PLEXOS which forces any coal units to continue to operate. The model is able to endogenously retire all existing thermal units or select other options for future operations as appropriate. Oregon Senate Bill 1547 requires the removal of coal-fired resources from Oregon's allocation by 2030. Washington's Clean Energy and Transformation Act similarly requires the removal of coal-fired resources from Washington's allocation by 2026. As a result, coal-fired resources can only be allocated to the four remaining states (Utah/Idaho/Wyoming/California) in PacifiCorp's service territory. As such, it would be inappropriate to consider them in Oregon or Washington's reliability position when all costs for those units have been specifically disallowed. If the model selects coal units to continue to operate, the only valid assumption is that these units contribute to UIWC. If new proxy wind, solar, geothermal, gas, pumped storage, nuclear or battery storage resources are less costly than the thermal units, they will be selected and potentially cause existing thermal units to retire, regardless of the reliability allocation of the existing thermal units.

Costs for existing thermal units are already locked down for the 2025 IRP Update. PacifiCorp's IRP team receives cost inputs for these units from subject matter experts who are on the ground managing units, building budgets/overhaul schedules, receiving bids for materials and labor, negotiating potential coal contract and other unit-specific items. Given the confidential nature of many of these costs (in order to protect PacifiCorp in the procurement process and ensure competitive costing), having a public conversation to get input on these costs would raise significant risks and jeopardize the interests of PacifiCorp's customers.

#### **Solar versus Wind and Block Products**

As discussed in the January 28<sup>th</sup>, 2026, public input meeting, an error was discovered in the cost inputs for wind, solar and battery items. Please see slide 33 for an explanation of the expected results of these corrections. Block products were not eligible to be selected in the Oregon and Washington Jurisdictional runs in the draft IRP Update. Block products are not eligible to serve Oregon and Washington in base assumptions as the current assumption is that these are unspecified, non-REC generating purchases. As such, under current methodology an unspecified purchase would contribute to Oregon emissions and harm compliance and would not contribute RECs to Washington's CETA position. PacifiCorp is open to revising this assumption for the 2027 IRP. PacifiCorp is concerned about the specific treatment of clean market products under Oregon and Washington law and intends to discuss this topic with stakeholders during the 2027 public input meeting series.

#### **System Resource Adequacy Run**

All jurisdictional portfolios include all loads and resources in the system and must meet reliability standards based on total system load. PacifiCorp's system resource adequacy run produced in the Draft 2025 IRP Update served all system load and met a system resource adequacy constraint. Because workpapers were not provided for the draft IRP update, PacifiCorp has not supplied the various iterations and runs. PacifiCorp will be supplying workpapers for the final 2025 IRP Update.

PacifiCorp has locked down its jurisdictional methodology for the 2025 IRP Update and cannot accommodate requests for changes at this time. PacifiCorp continues to be open to all stakeholder requests made regarding the 2027 IRP and looks forward to further discussions with stakeholders.

#### **Variant and Price Policy Portfolios**

1. There is no specific constraint requiring that a coal resource be replaced by any specific proxy resource. Coal resources are eligible to be replaced by all resource types. Gas prices contain variable pipeline costs.
2. Subsequent to the finalization of the draft 2025 IRP Update, PacifiCorp discovered that proxy gas resources did not include pipeline costs. PacifiCorp has corrected this error, and final modeling results for the 2025 IRP Update will reflect pipeline costs for proxy gas resources.
3. PacifiCorp confirms that removal of IRA tax credits is the only material change to proxy resource treatment.

For the draft, PacifiCorp was not able to complete all jurisdictional HH and LN model runs due to infeasibilities. This has been resolved and PacifiCorp anticipates completing LN, MN, HH and SCGHG price-policy base portfolios and applicable variants under MN.

#### **Utah Commission Order**

PacifiCorp will comply with commission orders and is completing this analysis.

\* Required fields