

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 _____

*Name: Benedikt Springer

Title: _____

*E-mail: Benedikt.springer@puc.oregon.gov

Phone: _____

*Organization: Oregon Public Utility Commission

Address: _____

City: _____ State: _____ Zip: _____

Public Meeting Date comments address: 1/28/26, IRP Update Draft

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.

- 2027 IRP
- 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.

2027 IRP

- Staff defers to the upcoming Commission Order in LC 85 but want to share the following additional observations:

[\[PacifiCorp comments\]](#) Noted.

- Staff notices in every input meeting that PacifiCorp's IRP process would benefit from a fundamental shift in planning philosophy. The Company often frames the IRP as merely a signal that new resources are needed; however, if that were its sole purpose, the details of the modeling would be largely inconsequential. The true value of the IRP lies in using modeling to address critical strategic questions about the future—questions that should guide resource decisions and risk management. Currently, the process is dominated by incremental modeling refinements and additional sensitivities that rarely inform actionable strategy. To improve, PacifiCorp should begin by engaging stakeholders to identify the most important questions the IRP must answer. For example, understanding the Company's exposure to market purchase risk is a key strategic issue. Addressing such questions requires clarity on what analyses and information are necessary—not simply running additional Plexos scenarios. While least-cost, least-risk planning remains the stated goal, the Company must focus on defining these questions, conducting targeted analysis, and using the results to justify a coherent strategy. Without this shift, the IRP risks becoming a procedural exercise rather than a meaningful planning tool.

[\[PacifiCorp comments\]](#)

[Please refer to discussion of Reporting Enhancements in the 2027 IRP public input meeting #5, held on March 11-12, 2026.](#)

[The IRP operates by defining a reasonable set of studies and comparing their outcomes on pre-determined metrics. This analysis is surrounded by a host of additional considerations that comprise the majority of an IRP report. The targeted analysis staff suggests is valuable in the](#)

* Required fields

context of alternative studies and considerations, which must ultimately be represented by portfolios, one of which will be determined as the best planning assumption to guide downstream activity.

The company would caution against a philosophy that says the IRP is merely procedural simply because it is flexible, proxy-based, large-scale, and subject to change. While the IRP may not constitute an “actionable strategy” to which the company would presumably be held to, it provides important insight into the direction the company should take based on the time of modeling. There is a balance between planning certainty and adaptiveness. Planning necessarily becomes more certain through downstream process, which are indeed influenced and informed, but not dictated by, the guidance provided in the IRP.

The public input meeting series opens all topics regarding the IRP for public discussion. The company strives to answer all stakeholder feedback forms and incorporate input where appropriate. While alternative analytics may be of interest, long standing practice is to focus on translating the interests and concerns of stakeholders into inputs, assumptions and studies to inform portfolio analysis, and ultimately to allow the model to indicate, without bias, the least-cost, least-risk plan forward per regulatory requirements.

A long-term strategy must yield to real-world volatility in the planning environment. The company believes that outside of additional IRP models, the type of targeted analysis and coherent strategizing implied by staff are a feature of the larger planning context, which includes the IRP, procurement and RFPs, negotiations, prudency determinations, and the host of additional reports and requirements serving narrower purposes, all of which regularly occur throughout every IRP cycle. The company is resistant to efforts to bring these other processes under the umbrella of the IRP for very practical reasons. In order to make more specific strategic determinations in the IRP, the process would necessarily have to be expanded into a four-year cycle inclusive of these other reports and processes. It is the company’s view that doing so would place an even heavier strain than the expansions made to the IRP process thus far, transforming it outside of a proxy planning exercise and would drive the relevance of results to be out-of-date—given the inherent modeling mechanics and limitations of this proxy modeling exercise.

- For the 2027 IRP, PacifiCorp should conduct transmission-constrained resource adequacy analysis to inform any locational constraints placed on resource acquisitions that contribute to meeting Oregon’s resource adequacy need; Staff does not think it is justified to exclude any PACE proxy resource categorically from contributing to Western resource adequacy. Staff suggests exploring this together with developing portfolio-specific ELCCs instead of using WRAP-specific QCC values.

[PacifiCorp comments] For the 2027 IRP, PacifiCorp intends to conduct a transmission-constrained resource adequacy analysis that identifies the quantity of new proxy resources located in PACE that could contribute to Oregon’s resource adequacy need. PacifiCorp has already committed to conducting a deliverability analysis as part of the 2025 Oregon Sibus RFP. PacifiCorp is considering the possibility of developing portfolio-specific ELCCs. As discussed at the January 28-29, 2026, public input meeting, PacifiCorp has significant concerns about the volume of modeling required to produce portfolio-specific ELCCs. This could hinder PacifiCorp’s efforts to include other modeling changes identified by stakeholders.

- Staff requests more analysis and engagement regarding options for modeling resource adequacy in the 2027 IRP, and the role of market purchases should be determined. Information presented so far is insufficient to justify the Company strategy one way or the other.

[PacifiCorp comments] Please refer to the January 28-29 public input meeting slides 8 and 58-75, regarding resource adequacy, and the March 11-12 public input meeting slides 56-63 and 71-74. PacifiCorp will include more content on specific modeling assumptions for the 2027 IRP in the April 22-23 public input meeting.

- In 2027 IRP, PacifiCorp should include a realistic level of large load growth in its reference case load forecast and evaluate a meaningful range of high and low growth scenarios. As such, Staff does not find the Company’s “all-in” scenario very informative. A meaningful selection might include:
 - Committed existing and new loads.
 - Adding load requests that are more likely than not to happen (for instance, currently in negotiations).
 - An estimated guess of long-run load growth independently of actually received interconnection requests.

[PacifiCorp comments] This recommendation has been incorporated in IRP planning as discussed in the January 28-29 public input meeting. This plan seems aligned with staff’s specific request presented here. Please refer to slides 9-12 from the meeting. As explained in these slides, PacifiCorp intends to include additional load growth sensitivities in the 2027 IRP that evaluate intermediate quantities of large load growth. PacifiCorp will continue to discuss load growth sensitivities and will present specific load growth forecasts at a future public input meeting.

2025 IRP Update:

- The methodological section should focus on key changes, including mechanics, reasoning, and justification. As such, Staff believes the Draft is short on content regarding topics such as jurisdictional modeling and resource adequacy. From the draft, it is unclear whether Staff’s concerns regarding the 2025 IRP jurisdictional methodology are addressed. Staff expects PacifiCorp to be able to distinguish policy from system reliability needs, avoid overbuilding, and create a system-optimized portfolio.

[PacifiCorp comments] PacifiCorp appreciates Staff’s feedback and has made a concerted effort to include additional narrative on jurisdictional modeling and resource adequacy in the final 2025 IRP Update. PacifiCorp also addressed these topics in the March 11-12 public input meeting. In the 2025 IRP Update, all jurisdictional models are required to meet system load using specific jurisdictional requirements. PacifiCorp also included a system reliability model in the 2025 IRP Update.

- Staff does not understand why a deliverability constraint for Oregon resource adequacy is necessary. Staff believes that absent specific analysis supporting such a constraint, the optimization model should be allowed to allocate transmission, however it is most valuable; Alternatively, the Company should conduct transmission-constraint resource adequacy analysis to calibrate resource adequacy constraints properly.

[PacifiCorp comments] PacifiCorp did not address concerns around the deliverability constraint in the 2025 IRP Update. However, as stated above, PacifiCorp is currently conducting additional deliverability analysis for the 2025 OR Situs RFP, and intends to refine its assumptions for the 2027 IRP.

- Staff appreciates the inclusion of a sensitivity that explores the effects of B2H achieving connection to PACW via BPA redirect rights. As stated in the November 2025 feedback form, it would be important to use that analysis to determine PacifiCorp’s strategy regarding B2H and update the Company’s action plan appropriately. For instance, Staff expects the IRP Update to explain what proactive steps the Company is taking to pursue PACW redirect rights, and how decision-making will look like over the next few years.

[PacifiCorp comments] PacifiCorp will include a discussion about BPA redirect rights in the 2025 IRP Update.

- Staff is very concerned about the re-introduction of market purchases for resource adequacy purposes, given that no justification or analysis is found in the 2025 IRP Update Draft. Additionally, Staff is confused about the Company’s statement that this has been done in response to Stakeholder feedback. Staff looked back through input forms and has not found any such suggestion. For instance, Sierra Club only suggests the Company allow unlimited economic market purchases, conditional on having met resource adequacy requirements through long-term owned and contracted resources. While stakeholders have long advocated for less market exposure, Staff is not fundamentally opposed to market purchases. Instead, PacifiCorp must present analysis supporting its strategy shift from the 2025 IRP. Furthermore, the Company should describe in its Action Plan how/why this is now a part

of the least cost, least risk strategy, but was not in 2025. Lastly, the Company should explain the logic of allocating block purchases to UWIC, instead of following current cost allocation practice.

[PacifiCorp comments] In their comments on PacifiCorp’s 2025 IRP, Idaho Public Utility Commission Staff wrote that “Staff believes that not counting FOTs in the integrated PP could result in overbuilding resources. Therefore, Staff recommends that the Commission direct the Company to meet with Staff to explore how to balance between meeting the WRAP resource adequacy compliance and avoiding overbuilding resources.”

Additionally, Oregon Public Utility Commission Staff questioned PacifiCorp’s restrictions on market purchases on page 33 of their Round 1 comments: “Staff wonders whether preventing all short-term market products from counting towards WRAP compliance is overly restrictive given that there are resource-specific products that can be used for WRAP compliance.”

PacifiCorp explained on page 105 of the 2025 IRP that it was not allowing market purchases to count towards resource adequacy requirements because of concerns related to WRAP. Subsequent to the 2025 IRP, PacifiCorp announced that it was exiting binding participation in WRAP. As a result, PacifiCorp is no longer concerned about the mechanics of WRAP compliance. PacifiCorp did not require that any quantity of market purchases be selected for resource adequacy in the 2025 IRP Update preferred portfolio. The endogenous selection of market purchases is an indication that market purchases are part of PacifiCorp’s least-cost, least-risk strategy

PacifiCorp addressed the allocation of block purchases to UIWC and concerns around the existence of clean market products at the March 11-12 public input meeting, specifically on slide 63.

- Regarding large load, Staff believes PacifiCorp should address in the IRP Update:
 - Definition of large load.
 - Definition of committed.
 - A list of included large loads.
 - A list of not committed but likely large loads. For instance, load requests in active negotiations.
 - The reason large loads are added after optimization instead of optimizing the system with all load. The Company should also explain how large load is served in the short-term model and how that influence build, dispatch, and emissions.

[PacifiCorp comments] Noted.

- Staff believes the IRP update should present a resource acquisition plan that addresses system reliability as well as state-specific needs and includes annual targets and important milestones.

[PacifiCorp comments] Noted.

- For HB 2021 compliance, the IRP update should provide a structured execution strategy with time-bound deliverables regarding procurement, allocation of existing resources, clean market purchase, and gas dispatch.

[PacifiCorp comments] Noted. PacifiCorp plans to make a supplemental filing in OPUC docket LC 85 in response to Commission Order No. 26-054 that will include a structured execution strategy for HB 2021 compliance (in fulfillment of Recommendation 10).

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.

* Required fields

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

PacifiCorp Response:

Please see in-line responses to specific topics above.