

PacifiCorp - Stakeholder Feedback Form
RESPONSE to PacifiCorp RESPONSE
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 3/2/2026

*Name: Jennifer Eden

Title: Sr Climate & Clean Energy Associate

*E-mail: Jennifer@utahcleanenergy.org

Phone: 801-590-3606

*Organization: Utah Clean Energy

Address: 215 S 400 East

City: Salt Lake City State: UT Zip: 84111

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

This document is being filed in response to PacifiCorp’s filed response to UCE’s Stakeholder Feedback Form dated 1/16/2026: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2027-irp/2027-irp-comments/2027.014_UCE_1-15-2026_with_response.pdf

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.

Utah Clean Energy’s previous request (from 1/16/26): 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.

PacifiCorp Response: “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.”

UCE Response to PacifiCorp Response:

In past IRPs, PacifiCorp has modeled a Max DSM variant (2023 IRP P13-Max DSM, pg 286, Fig 9-24, 9-25 https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023-irp/2023_IRP_Volume_I_Final_5-31-23.pdf) and in the 2015 IRP Utah Clean

* Required fields

Energy requested that PacifiCorp model DSM that reached 1.5% of retail sales which PacifiCorp did in their BASE+ scenarios. These 2015 scenarios showed positive PVRR. Acknowledging that a different model was being used in 2015, we recognize that PLEXOS may require some different inputs to achieve this. However, we are also aware that multiple states have energy efficiency resource standards (EERS) that require energy efficiency reductions that equal a certain percentage of retail sales. Utilities in these states successfully model DSM as a fraction of retail sales. PLEXOS is a commonly used Capacity Expansion Model which certainly has this capability. We, again, ask that PacifiCorp model 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.” For point of reference, PacifiCorp Utah achieved 0.96% savings as percent of sales in 2021; 1.15% savings as percent of sales in 2022; and 0.88% savings as percent of sales in 2023.¹ We welcome the opportunity to engage collaboratively on these DSM modeling scenarios as part of the Rocky Mountain Power DSM Steering Committee.

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:

PacifiCorp is supportive of conducting an additional high- or maximum-DSM sensitivity. We will collaborate with stakeholders in order to develop an approach, keeping in mind the analysis that is already available through the Conservation Potential Assessment and other studies, such as load sensitivities. It must be recognized that while this sensitivity may be informative, achievable potential will likely make this sensitivity unrealistic as a guide to near-term activity. In these conversations, it may be that placing a hard requirement is the best method, but at this time PacifiCorp would like to remain flexible to ensure we meet this modeling request in the most effective way. As with any proposed sensitivity, our ability to include the analysis will depend upon the availability of time and resources as studies are being developed.

¹ 2023 Utility Energy Efficiency Scorecard, ACEEE. <https://www.aceee.org/research-report/u2304>

* Required fields