

PacifiCorp - Stakeholder Feedback Form

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 call, 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 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 post appropriate feedback on the IRP website based on your selection below.

Date of Submittal 2026-03-17

*Name: Nancy Kelly Title: _____

*E-mail: nkelly@westernresources.org Phone: _____

*Organization: Western Resource Advocates

Address: 307 West 200 South, Suite 200

City: Salt Lake City State: UT Zip: 84101

Public Meeting Date comments address: _____ Check here if 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.

Use of market purchases as a capacity product; derivation of UWIC allocation factor

Check here if you want your Stakeholder feedback and accompanying materials posted to the IRP website.

***Respondent Comment:** Please provide your feedback for each IRP topic listed above.

Use of market purchases as a capacity product; derivation of UIWC allocation factor

Slide 77 of the November PIM presentation states that PacifiCorp will include 1000 MW of FOT's as a capacity product in the 2023 IRP Update, stating that this is responsive to stakeholder comments asking for an evaluation of the tradeoffs between firm market purchases and resource procurement.

During the March PIM, PacifiCorp explained that the 1000 MW would be modeled as a block product that represents "unspecified" power and is therefore not eligible to meet Washington or Oregon's resource needs. The UIWC jurisdiction was allocated 64%, while the other 36% remained unallocated. So, for all practical purposes the decision to include 1000 MW of a block product was a decision to make available to the model 640 MW of block purchases to meet UIWC capacity needs.

- Please provide all comments requesting that PacifiCorp evaluate the tradeoffs between firm market purchases and resource procurement; identify which organizations sponsored the request(s) and the forum(s) in which the comments were received.
- Some experts are warning of a possible market cliff in 2030 as resource adequacy programs bind. What is the basis for assuming that 1000 MW of block product will be available over the 20-year planning horizon?
- Please explain the derivation of the 64% allocation factor used for assigning fixed resource shares to the UIWC jurisdiction. Which years are included in the development of the allocation factor used?
- Please identify all resources whose shares were fixed for the UIWC jurisdiction as of 2030 using the 64% allocation factor.

* Required fields

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:

- a) PacifiCorp provides the following as examples of formal stakeholder comments. PacifiCorp does not inventory “all” comments, especially if the comments are verbal.

In 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.”

- b) PacifiCorp has recently been able to transact in excess of 1,000 MW of forward market products to meet its peak requirements. Market liquidity may change substantially as a result of resource adequacy programs, but it is unclear whether market liquidity will increase or decrease. The advent of resource adequacy programs may lead to over-procurement of new resources, driving down market prices and increasing liquidity. There are risks associated with market reliance, but there are also costs implications and risks from incremental long-term resource procurement. Block products are specifically modeled to mitigate risk by representing advance transactions, inclusive of hours where the purchase may not be fully needed, similar to how actual transactions of this type are executed. For a more detailed discussion of this topic, please refer to PacifiCorp’s 2025 Integrated Resource Plan Update, filed on March 31, 2026. Chapter 9 (Alternative Path Analysis) includes a section discussing short-term market reliance. PacifiCorp is willing to reconsider the specific quantity of block product availability allowed over the full horizon and welcomes specific proposals from stakeholders.
- c) The 64% allocation factor was taken from PLEXOS database assumptions used in the 2025 IRP. The value was derived from projected system generation factors for Utah, Idaho, Wyoming, and California.
- d) The only resource fixed at a 64% allocation factor for UIWC in 2030 is the block product. All allocation factors used in the 2025 IRP Update are projections based on IRP retail sales and are not intended to match allocation factors used in other proceedings.