

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: 3/11/26 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

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.

Price-Policy Scenarios

It might make sense to distinguish between scenarios that are good for stress-testing portfolios and scenarios that are good for the construction of portfolios. A high gas price/high carbon price provides information on how portfolios perform under extreme conditions, although stochastic analysis may provide value here too. We would suggest additionally building a portfolio around a medium or low gas price with a medium carbon price as a plausible future scenario.

[PacifiCorp Response]:

PacifiCorp is open to including another price-policy scenario in the 2027 IRP and would like to further discuss with stakeholders which price-policy scenario would best represent a plausible future.

Market Purchases

It is currently difficult to evaluate to which degree PacifiCorp's market purchase proposal for the 2027 IRP over- or under-exposes the system to risk. It would be important that the IRP uses market purchases not only to test the economics of resource options but also be able to inform an overall strategy in regards to market purchases. The IRP should explicitly answer two questions. Is the preferred portfolio overexposed to market volatility or scarcity? What portfolio and strategy would reduce exposure at a reasonable cost? There are many plausible approaches to answering these questions, but we think this would likely involve creating a portfolio optimized for more constrained markets (either in term of volumes or extremely high peak prices) and comparing costs. PacifiCorp should also assess the future availability of short-term market purchases and present this in the IRP. In terms of strategy, it would be important that the IRP compare the assumptions about market purchases to current operational practices and propose appropriate items in the Action Plan if there is a gap. For instance, if the Company's plan is make less FOTs for capacity in five years, the Action Plan should describe how this will be achieved. And what alternatives PacifiCorp will explore in case this is not achieved?

[PacifiCorp Response]:

* Required fields

PacifiCorp agrees that it is important to assess the risks of market volatility and scarcity within the IRP. The 2025 IRP introduced daily scalars for market prices, increasing market volatility in the normalized view. The 2025 IRP also removed all market purchase availability during key hours as a way of representing scarcity. PacifiCorp intends to include both of these improvements in the 2027 IRP.

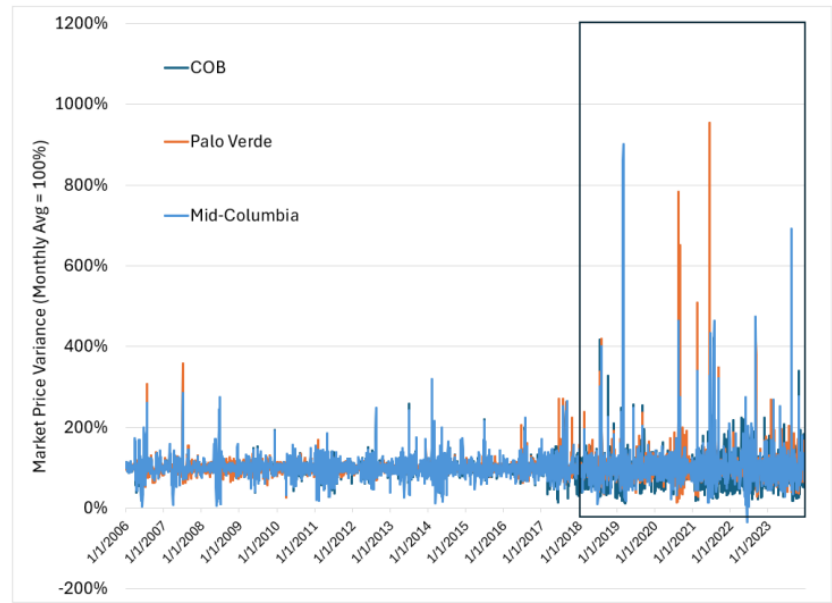
PacifiCorp presented a variety of concerns related to market exposure at the March 11-12, 2026 public input meeting. For any given assumption about market availability and cost, PacifiCorp’s IRP modeling approach can determine the portfolio that minimizes system cost while serving all system load. The difficult part is to choose one assumption about long-term market availability and cost as the base assumption, particularly given the evolving planning environment. PacifiCorp is joining the California Independent System Operator’s extended day-ahead market (EDAM) in 2026, and it will take some time to fully evaluate how this affects market conditions.

At the August 14-15, 2024 public input meeting, PacifiCorp included a slide (reproduced below) showing historical variation in market prices. Variation has increased significantly since 2018, but prices remain low in many hours. A more constrained market view that increases prices (or removes liquidity) during all hours may result in a portfolio that is overbuilt and unable to capture the benefits of low market prices.

Historical Market Prices Variation



- The variation in market prices across each month has increased since 2018.
- Increasing renewable resource penetration may drive prices down when resources are plentiful.
- While load is growing, a number of dispatchable resources have retired.
- More extreme weather may also be playing a role.
- This increased level of market price variation is expected to continue in the future.



PacifiCorp is interested in including an alternate assumption about market availability in the 2027 IRP, and would initially propose that this view double the number of key hours with no market purchase availability while not changing market prices or availability in other hours. PacifiCorp is interested in discussing this proposal with stakeholders and remains open to other ideas.

In response to Staff’s comment about the Action Plan, the alternative to front office transactions is procurement. PacifiCorp will consider how to make this tradeoff clearer within the Action Plan.

Stochastics

We have no suggestions on the specific mechanics presented but want to emphasize the need explain to Commissions and stakeholders what types of risks the analyses assessed and how that supports choosing one path over another.

[PacifiCorp Response]:

* Required fields

PacifiCorp agrees that it needs to explain how stochastics analyzes risk and which path is supported by the results of stochastics.

Variants and Sensitivities

We have no notes on the specific variant/sensitivities proposed but want to emphasize the need to incorporate the learnings from these analyses into portfolio choices and Action Plan. It is helpful for Commissions and stakeholders to see explicitly how sensitivities/variants have been used to arrive at a least cost, least risk plan.

[PacifiCorp Response]:

PacifiCorp made several additions to the narrative in the 2025 IRP Update to show how the sensitivities and variants affect the plan. In particular, PacifiCorp added a Robustness Analysis to Chapter 7 comparing each variant portfolio across selection criteria, PacifiCorp added a Robustness Assessment section to Chapter 8 which compares the performance of each variant portfolio across the sensitivity assumptions, and PacifiCorp devoted all of Chapter 9 to the Alternative Path Analysis. PacifiCorp looks forward to feedback from stakeholders on these substantial additions.

Demand Response:

We wonder whether the IRP should attempt to value large load flexibility/demand response to inform tariff development.

[PacifiCorp Response]:

PacifiCorp is interested in this idea and open to further stakeholder suggestions.

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.

* Required fields