

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 April 9, 2026

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*Organizations: The Utah Parties: Division of
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Address: 307 West 200 South, Suite 2000

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.

Coal-cost allocation to jurisdictional portfolios

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.

Coal Cost Allocation Modeling Straw Proposal

With the removal of Washington from cost support for coal-fired resources, and with the exit in 2030 of Oregon from supporting the costs of coal-fired resources (and assuming California does not participate in coal-fired resources past 2029), the three remaining states' cost shares would increase significantly, significantly altering these states' risk profiles.

Based on 2025 allocation factors, Utah's cost share would grow from 45% to 71%; Wyoming's share would grow from 13.9% to 20.2%; and Idaho's share would grow from 6% to nearly 9%.

In negotiating the 2020 Protocol (expired December 31, 2025) parties intended that coal-fired generation that was removed from other states rates be evaluated like any other resource acquisition before being reassigned to the remaining states, and PacifiCorp entered into a side agreement with Utah regarding the type of analysis it would provide. This side agreement provided that any additional percentage of PacifiCorp's existing coal fleet proposed to be

* Required fields

assigned to Utah would be evaluated in light of Utah's specific load and resource balance. PacifiCorp also agreed to evaluate the coal units individually and in economic combinations.

However, in both the 2025 IRP and the 2025 IRP Update, PacifiCorp automatically reallocated coal-fired generation shown to be cost effective from a system view (based on endogenous coal retirement analysis) to the UIWC jurisdiction, without analyzing Utah-specific or even UIWC-specific load and resource needs. This approach does not align with PacifiCorp's past agreements or parties' intent in negotiating the 2020 Protocol.

As of the 2025 IRP, PacifiCorp-owned coal-fired generation operating beyond 2029 is located in Utah and Wyoming, with roughly 1,934 MW of summer peaking capacity concentrated in two Utah plants and 1,505 MW of summer peaking capacity concentrated in three Wyoming plants, or a total of 3,439 MW of summer peaking capacity. Washington's 2025 allocated share of the total based on a 2025 rolled-in allocation factor is roughly 260 MW and Oregon's share is roughly 900 MW, for a rough total of 1,160 MW of coal-fired capacity that these states have exited or will be exiting by the end of 2029. (The use of the 2025 SG factors is illustrative.)

Therefore, as of 2025, roughly 1,160 MW of coal-fired capacity must be evaluated as a resource option against other alternative resource procurement strategies rather than automatically being reallocated to the UIWC jurisdiction.

The proposed approach below is intended to be a conversation starter with PacifiCorp regarding how to achieve this modeling objective for IRP purposes only. For any other proceeding the analysis would need to be far more thorough than what we are proposing here.

We request that the Company perform the modeling described below even if the Company does not agree that the intent behind the 2020 Protocol is still relevant after the expiration of the protocol on December 31, 2025.

Proposed Modeling Approach

Step 1: Determine coal-fired generation to be included in UIWC Portfolio.

In order to understand the costs and risks to the UIWC jurisdiction from absorbing the shares of coal-fired generation exited by Washington and Oregon, the evaluation of these costs and risks must occur at the UIWC jurisdictional level. The following approach would identify the costs and stochastic risks of continuing to operate coal-fired capacity against the costs and stochastic risks of other alternatives. We are requesting four portfolio runs: an endogenous coal retirement run and three forced coal retirement/natural gas conversion runs to provide comparative metrics.

a) Identify endogenous coal retirements and natural gas conversions.

The first sub-step is a system optimization subject to reliability constraints that considers only UIWC load and allocated resource shares while allowing endogenous coal conversion or retirement. Any coal conversions or retirements identified in this initial run would count toward the 1,160 MW reduction in coal-fired generation needed to keep the MW of coal-cost responsibility unchanged for the UIWC jurisdiction when Oregon exits coal in 2030.

To the extent that less than 1,160 MW of retirements or conversion are identified in the endogenous coal retirement simulation, forced retirement or forced gas conversions will be required to understand how costs and risks might change if the UIWC avoided an increased share of coal-fired capacity.

b) Identify three alternative retirement/gas conversion options and compare costs and risks to endogenous retirement portfolio

We request that PacifiCorp develop three alternative retirement/conversion paths for portfolio analysis, each summing to approximately 1,160 MW of coal retirement by 2030. For example, since the Jim Bridger units have the highest operating costs, PacifiCorp would likely select Jim Bridger Units 3 and 4 along with an additional 455 MW for at least one of the alternative retirement paths. The units comprising the additional 455 MW would differ from one another and would be selected based on operating characteristics, costs, and alternative generating options available at the plant location. We would like to discuss retirement/conversion options and timing with PacifiCorp.

Cost and risk metrics would be developed for each forced retirement/conversion portfolio to be compared to the cost and risk metrics from the endogenous retirement case.

c) *PacifiCorp determines the coal-fired generation to be included in the UIWC jurisdictional portfolio*

Using the cost and risk metrics developed above plus any other relevant considerations, PacifiCorp identifies the coal-fired generation to be included in the UIWC jurisdictional portfolio.

Step 2: System optimized reliability run that includes UIWC identified coal generation

A system simulation that includes all system loads and resources is undertaken. Existing coal resources available to the model for selection include only the coal-fired generation selected as a result of the analysis in Step 1.

This becomes the base reliability portfolio against which the costs of Oregon and Washington policies are compared.

Step 3: Optimize Oregon and Washington Portfolios (Taken from slide 31 from the January PIM)

Oregon policies are inputted into the model as well as the coal resources identified as cost effective in step 2. No resource selections are “locked.”

Washington policies are then inputted into the model, as well as Oregon policies and the coal resources identified as cost effective in step 2. No resource selections are “locked.”

The resource additions selected in this (these) step(s) comprise the Oregon and Washington Portfolios.

Step 4: Combine Selections (From slide 31 from the January PIM)

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:

* Required fields

PacifiCorp appreciates the detailed modeling plan presented by Utah parties. PacifiCorp agrees that an analysis evaluating the cost-effectiveness of the UIWC jurisdiction absorbing the shares of coal-fired generation exited by Washington and Oregon is a worthwhile endeavor. PacifiCorp has developed a counterproposal that the Company believes achieves the desired analysis but avoids some concerns the Company has with the proposal by Utah parties. This counterproposal assumes the transfer agreement of Washington assets as a base assumption. Model inputs and assumptions will be appropriately adjusted to reflect this change.

The primary concern PacifiCorp has with Utah parties' proposal is the request to run a UIWC jurisdiction-only load and resource study to determine thermal resource selections. PacifiCorp operates as a multistate system and has developed the jurisdictional portfolio and integration process to avoid running subsets of its system which presents a distorted version of reality. As an example, including only UIWC load in a run may alleviate transmission congestion on the system that is present when the rest of the system load and resources are present, providing an inaccurate picture of the value of resources present in the UIWC load only run. Additionally, PacifiCorp has concerns with combining resource selections from Oregon and Washington jurisdictional portfolios after the system optimized reliability run because the value of resources, including thermal resources, may be impacted by the decisions made in Oregon and Washington jurisdictional runs.

Acknowledging the concerns outlined above, PacifiCorp offers the following counterproposal to evaluate the cost-effectiveness of the UIWC jurisdiction absorbing the vacated Oregon and Washington shares of coal-fired generation. In all endogenous modeling, PacifiCorp proposes to consider the thermal options presented at the April 22nd, 2026, public input meeting.

Step 1: Optimize the Oregon jurisdictional portfolios.

Consistent with the 2025 IRP Update, Oregon jurisdictional portfolio including all Oregon requirements is optimized.

No resource selections, including thermal resources, are locked, meaning thermal options and retirements are selected endogenously. Thermal selections from the Oregon jurisdictional portfolio do not determine thermal selections in the system run.

Step 2: System optimized run with UIWC only resource adequacy constraint to determine UIWC resources and thermal resource outcomes.

Start by locking Oregon proxy resource selections from the Oregon jurisdictional portfolio (Step 1).

Run an endogenous system portfolio inclusive of all system load and resources. Include a UIWC-only resource adequacy constraint so incremental proxy resource selections and thermal resource decisions are determined based on UIWC needs only. Beginning in 2030, each existing coal unit will be separated into two units in PLEXOS: one that represents UIWC's current share (UIWC combined SG share), and one that represents the assumed to be unallocated share (equivalent to Oregon and Washington's SG shares). The total capacity from both units will count towards UIWC's resource adequacy target, but the model will be allowed to retire the unit representing the combined Oregon and Washington share while keeping the UIWC share. This allows the model to evaluate the economics of assigning the vacated share of the coal units to UIWC. This portfolio will exclude Oregon requirements as proxy resources (selected in Step 1) satisfying those requirements are already included in the portfolio.

This portfolio identifies the optimal combination of proxy resources and existing thermal resources that satisfies UIWC resource adequacy requirements.

Step 3: Run variants forcing specified retirements.

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Develop three alternative retirement variant portfolios to compare to the endogenous system optimized run. PacifiCorp is open to feedback around the determination of which resources should be retired in each variant portfolio. Replacement resources for lost capacity will be selected by the model endogenously.