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

*Name: Yao Yin Title:

*E-mail: yao.yin@puc.idaho.gov Phone:

*Organization: Idaho Public Utilities Commission

Address:

City: State: Zip:

Public Meeting Date comments address: January 29 X☐ 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.

Distributed Generation

☒ 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.

I have several questions regarding Distributed Generation.

1. Please list all the customer classes that have installed behind-the-meter Distributed Generation in the Company's system and explain whether all of the classes have net billing programs.

Across PacifiCorp's service territory, residential, commercial, industrial and irrigation customer-generators may take service under legacy net metering tariffs or successor net billing tariffs, depending on the state and the date of interconnection. Utah, Idaho and California have adopted successor net billing tariffs and also have legacy net metering schedules for grandfathered systems. Net metering tariffs are available to customers in Oregon, Wyoming and Washington.

2. Please list percentages of customers in each class that have installed Production Meters that can measure the total generation amounts.

* Required fields

Please refer to the table below for the percentage of customers in each class with distributed generation production meters.

Class	Percent of Class
Residential	0.02%
Irrigation	0.10%
Commercial	0.09%
Industrial	0.05%

3. Mr. Dan McNeil mentioned that about half of the generation output that customers get from the Net Billing program in Utah reduces their own consumption. How did the Company know the information if production meters are not universally installed?

PacifiCorp's estimates of generation volumes using production metering data if available, as well as production simulations such as NREL's System Advisor Model (SAM) or PVWatts to simulate production for an average system. When combined with export and consumption profiles which are available from metering for customers on Utah's Net Billing program (Schedule 137), this can provide a reasonable estimate of the share of generation and exports. The actual share of exports would generally be lower for customers with smaller system sizes or to the extent customers are able to shift their load into solar hours, forgoing the export rates during solar hours but avoiding higher retail costs in non-solar hours. For additional discussion, please refer to Table 3.1 on page 6 of the Supplement to Rocky Mountain Power's On-site Generation Study, filed in docket PAC-E-23-17 on June 29, 2023 and is copied below. Available at: https://lf-puc.idaho.gov/WebLink/DocView.aspx?dbid=0&id=81991. Net Billing uses Instantaneous Netting, shown in column 3.

Table 3.1: Comparison of Generation to Exports under Different Netting Scenarios

Export and Generation (kWh)	a. Monthly Netting	b. Hourly Netting	c. Instantaneous Netting	d. Generation
Residential Sch 1	2,111,780	8,062,620	8,554,724	16,422,970
Residential Sch 36	551,492	2,058,027	2,182,649	4,124,398
General Service Sch 23	244,599	534,099	565,335	1,512,638
General Service Sch 6	58,760	116,414	123,320	522,963
Total	**2,966,631**	**10,771,161**	**11,426,028**	**22,582,969**

Export % of Generation	a. Monthly Netting	b. Hourly Netting	c. Instantaneous Netting	d. Generation
Residential Sch 1	13%	49%	52%	100%
Residential Sch 36	13%	50%	53%	100%
General Service Sch 23	16%	35%	37%	100%
General Service Sch 6	11%	22%	24%	100%
Total	**13%**	**48%**	**51%**	**100%**

4. The Distributed Generation Adoption Model uses billing data. Please explain what kind of billing data are used.

Customer billing data is used to develop energy use profiles and characteristics for individual customer segments. This informs the development of 8760 load profiles used in the hourly analysis portion of our economic module (modeling hourly impacts before and after DG adoption). The actual billing data characteristics used to develop these inputs are monthly and annual energy use and customer building types (to assign technical feasibility factors).

5. What kind of results does the Distributed Generation Adoption Model generate? Is it a net load for each class that has installed Distributed Generation, OR is it total load and total generation for each class?

* Required fields

The adoption model produces the following results for each individual modeling permutation (state / customer segment / DG technology (configuration)) within each year over the analysis timeframe:

- Number adopters (customers)
- Incremental and cumulative capacity (MW & MWh)
- Hourly generation shapes (MWh/h)

The IRP team then takes this "total generation for each customer class" and incorporates it into their model to calculate net load for each class that has installed DG.

6. Distributed Generation customers are treated as a LOAD component in the load forecast, and they pay for reserves associated with load variability through their retail rates. Then why do they also need to pay for integration charges as RESOURCES to cover reserves associated with generation variability through ECR?

For the purposes of the IRP, the entirety of the forecasted distributed generation is deducted from load because that generation offsets either a customer's own load or assists in serving nearby load, generally on the same distribution circuit. Retail customers would only be paying retail rates for their own load, while export credit rates (and the associated integration costs) are only applied to output in excess of a customer's retail load. As a result, integration is applied separately to two distinct portions of the overall distributed generation volume and is not being charged twice for the same increment of output. For a discussion of integration of customer exports, please refer to the February 7, 2025, testimony of Daniel MacNeil in Idaho Docket No. PAC-E-25-02.

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