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: September 3, 2026

*Name: Jennifer Eden & Kate Bowman

Title:

*E-mail: jennifer@utahcleanenergy.org
kbowman@votesolar.org

Phone: 801-647-6139

*Organization: Utah Clean Energy and Vote Solar

Address: 215 S 400 East

City: Salt Lake City State: UT Zip: 84111

Public Meeting Date comments address: July 15, 16, 2026 and August 26, 2026 ☐ Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Logan Mitchell, Jenn Bodine, Kevin Emerson

*__IRP Topic(s) and/or Agenda Items:__ List the specific topics that are being addressed in your comments.

Optimizing Distributed Energy Resources (DER) including Distributed Generation (DG) and Demand Side Management (DSM), discussed in Public Input Meetings (PIM) #8 and #9 on July 15-16, 2026 and August 26, 2026.

Section VI. 2., (page 44 of the Order of PacifiCorp's 2025 Integrated Resource Plan, entered by the Utah Public Service Commission (hereinafter "PSC") on June 25, 2026, Docket No. 25-035-22) states, "10. **We direct PacifiCorp to** share and discuss the updated distributed generation (DG) study with stakeholders in PIMs in preparation of the 2027 IRP and **consider innovative ideas for attaining a system-optimal amount of DG and DSM** in both PIMs and DSM committee meetings. In addition, **we direct PacifiCorp to explore how to optimize incentives** for customers' use of DG and DSM resources such as Subscriber Solar and Blue Sky to mitigate customer rate increases" (emphasis added).

☐ 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.

We appreciate PacifiCorp's initial discussions of the updated DG study at the 8th PIM on July 15-16, 2026 and follow-up discussions during the 9th PIM on August 26, 2026. During PIM #9, PacifiCorp presented a plan to complete additional analysis of DSM and DG, including an additional sensitivity analysis in the 2026 DG Study. We appreciate PacifiCorp's timely effort to analyze this issue in the 2027 IRP, and provide feedback on the proposed testing variables. We also request a more thorough discussion on this multi-faceted topic to fully explore the Commission's directive in future PIMs.

(1) Feedback and Request Regarding DG Study Sensitivity Analysis presented during PIM #9.

* Required fields

The stated purpose of the additional DG analysis PacifiCorp introduced during PIM #9 is to "model the impact of PacifiCorp levers for influencing Distributed Generation adoption."[1] Utility rates and programs impact adoption of distributed energy resources, including DG, and we agree that it is worthwhile to test and understand how changes to utility rates and programs are likely to impact adoption of DG.

In PIM #9, PacifiCorp proposes a relatively narrow analysis to evaluate how a single lever - the Export Credit Rate (ECR) - affects DG adoption, and corresponding reduction in forecasted load and peak demand. The ECR is only one lever available to PacifiCorp to influence DG adoption. There are many other levers, in the form of rates, programs, and incentives, that influence customer DG adoption. To more fully explore the impact of PacifiCorp levers for influencing DG adoption, we propose the following sensitivity analyses. These sensitivities are not chosen due to any preconceived notion as to outcome, but rather to more fully understand the interaction between PacifiCorp rates and incentives and customer adoption of DG.

- Varying the Export Credit Rate (for example: increasing the ECR by 25% and 50%)
- Varying the Wattsmart Battery incentive (for example: returning the incentive to 2025 levels; increasing the participation incentive to have no cap)
- Placing DG and storage customers on Schedule 2, the optional time of day rider

PacifiCorp Response:

Since the PSC order (cited above) was issued, PacifiCorp has considered several concepts, or innovative ideas, surrounding how to optimize DG and DSM, including evaluating these resources from a utility perspective; considering them from the customer perspective; testing the adoption impacts of varying the export credit rate; and reviewing how the Wattsmart Battery DR program promotes adoption of battery energy storage system (BESS) technologies and is ultimately optimized via the existing DSM frameworks in place.

PacifiCorp anticipates posting the underlying workbook of this analysis on the IRP Studies & Support webpage for interested stakeholders to review.

PacifiCorp appreciates the suggestions for additional sensitivity analyses to consider.

Varying the Export Credit Rate: The results of the initially-proposed sensitivity analysis are now available, new since the last IRP PIM meeting. These results show that a 10% increase in the Utah export credit rate yields 1.3% additional DG adoption at a cost of $227/kW of nameplate capacity. Since this is already more expensive than acquiring one new kW of demand response or other existing DSM resources, it is possible that increasing the costs up to levels of 25% or 50% would result in even more costly outcomes, assuming the incremental adoption rate / price elasticity remains constant.

Varying the Wattsmart Battery incentive: Thank you for the reminder that PacifiCorp does already incentivize the adoption of BESS technologies via the Wattsmart Battery Demand Response program. In this way, this important DG resource is also modeled endogenously in the IRP since it is currently being classified as a demand response resource included in the Conservation Potential Assessment. Additionally, this program's incentives are also already being captured in the Low, Base, and High cases of the DG Study's adoption model.

[1] Slide 27, PIM #9, https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2027-irp/PacifiCorp_2027_IRP_PIM_9.pdf.

* Required fields

Since this program's total expenditures, including customer incentives, are recovered via the DSM tariff in Utah, Schedule 193, its costs and benefits are therefore also included in the overall DSM portfolio's cost effectiveness testing. The IRP's avoided cost values for demand response programs offer the effective ceiling for incentives and other program costs. And so, increasing this program's incentives beyond the point of cost effectiveness would work to both increase the Schedule 193 budget while simultaneously reducing the overall DSM portfolio's cost effectiveness results. PacifiCorp opposes this outcome as it is not in the best interest of customers.

Placing DG customers on Schedule 2: Customers who install DG technologies and/or participate in Wattsmart Battery DR program are already eligible to enroll in the available opt-in time of use rate and have begun to do so. To the extent that DG resources allow participants to reduce their usage during the more expensive peak hours, they would experience cost savings on their bills, which arguably reflects another avenue customers have to enable DG, another way PacifiCorp is currently incentivizing DG via existing frameworks.

(2) Request for a Distributed Energy Resource (DER) Stakeholder Engagement Process.

The Utah PSC's Order to identify a system-optimal amount of DG and DSM requires iterative modeling that seeks to co-optimize customer-sited DG and DSM, exploring the ways that resources like distributed solar and storage work together to shape and shift customer load. This is a complex process that requires that both DG and DSM be modeled such that they can be evaluated alongside utility-scale resources, while also evaluating the unique system attributes of customer-sited resources located on the distribution system. While PacifiCorp models DSM, including distributed storage, as an endogenous resource, DG is applied as a blanket load reduction based on forecasted adoption rates of DG. In reality, adoption and dispatch of storage is often coincident with distributed generation and should be addressed together with DG.

As such, we request that PacifiCorp conduct a series of four dedicated stakeholder meetings focused on distributed energy resources (DER), including distributed generation (DG), distributed storage, and demand side management (DSM), in order to comply with the Commission's directive. We appreciate Rocky Mountain Power's scheduling of the Utah DSM Advisory Group meeting on September 28, 2026 to discuss this topic. However, we feel that this one-hour meeting will not be sufficient for thorough exploration of system-optimal DG, and therefore request a series of meetings. The purpose of these meetings is to help the Company, stakeholders, and the Commission understand where relevant analysis of DG and DSM is already taking place, identify gaps in existing efforts, and explore innovative approaches and best practices that can be implemented for PacifiCorp to meet the Commission's directive. We further request that the Company solicit stakeholder input on the agenda topics for each of these meetings.

We believe dedicated meetings on this topic are necessary because:

1. The PIM process insufficiently explores the complexities of DG modeling in the IRP. While the Utah DSM Steering Committee has long been a robust forum for both energy efficiency and demand response programs, it is not a forum to explore DG.
2. The Utah DSM Steering Committee is not open to the public as the IRP PIMs are. While the Utah DSM Advisory Group is an open forum, it has not typically been a venue used to discuss IRP-related analysis and processes. It may be possible to expand the scope of, and time allocated to, the DSM Advisory Group to include consideration of how DG is evaluated in the IRP process.
3. Because DG is not treated as an endogenous resource in the IRP PLEXOS modeling as DSM is, we do not currently have a way to determine "system-optimal amount[s] of DG" as we have for DSM. Meeting

the Commission's directive in this regard will take concerted effort to identify analytical best practices and paths forward.

For these reasons, we request a collaborative process during at least four meetings to discuss how best to determine system-optimal amounts of DG and DSM, and inform customer-facing programs and incentives, per the Commission's Order. We request the opportunity to discuss with PacifiCorp how best to structure the cadence and topics of these meetings in advance of the September 28, 2026 DSM Advisory Group meeting.

PacifiCorp Response: Thank you for the suggestion. PacifiCorp anticipates continuing to follow the PSC order's directive to address this topic in the IRP Public Input Meeting series (which occur approximately every 5 to 7 weeks during the IRP process) and the DSM committee meetings (which occur at least quarterly). These meeting venues are designed to solicit input from interested parties, as well as offer the chance to provide additional written comments.

(3) Request that PacifiCorp model DG endogenously in PLEXOS for the 2027 IRP.

Determining "system-optimal" amounts of DG and DSM requires modeling of DG and DSM endogenously in PLEXOS, where both DG and DSM compete on a cost-basis against other resource options including generation, storage, and transmission. While PacifiCorp currently models DSM endogenously, PacifiCorp stated in PIM #8 that they only incorporate DG into the IRP process as a blanket reduction in load rather than as a resource that can be chosen. While many utilities have historically modeled DG in this manner, modeling capabilities have improved substantially as utilities gain more experience with DG. New methods and capabilities [see Data Support for reference] are moving toward endogenous or at least iterative treatment of DG adoption in order to incorporate the time-varying and location-varying value of the resource, as well as the costs and benefits of DG to the system.

For example, the vendor for PLEXOS, Energy Exemplar, published a report about Integrated System Planning, which provides a framework for treating the energy system as a holistic, unified, and interrelated network. The Report [https://www.energyexemplar.com/blog/integrated-system-planning] states that utilities should model DG endogenously because, among other reasons, modeling DG allows the system to better respond to price signals, which will provide a more accurate least cost, least risk portfolio. Currently, iterative modeling between DG forecasts and capacity expansion modeling may be the first step to reaching a system-optimized amount of DG, as is done by National Lab of the Rockies when running ReEDS, their Capacity Expansion Model, iteratively with dGen, their DG forecast model. This iterative process allows the DG forecast to respond to price signals obtained from the IRP PLEXOS model. Additionally, a new open-source model called OpenBCA is designed to evaluate costs and benefits of distributed energy resources based on National Standard Practice Manual (NSPM) evaluation processes which can feed into Capacity Expansion Models such as PLEXOS.

Finally, the PSC directed PacifiCorp to provide committee meetings to explore "how to optimize incentives for customers' use of DG…" and "**consider innovative ideas** for attaining a system-optimal amount of DG…". While PacifiCorp has briefly touched on this topic at PIM #8 and PIM #9 and has indicated that this will be discussed at the upcoming September 28, 2026, Utah DSM Advisory Group Meeting, there has not been sufficient discussion to determine "system-optimal" amounts of DG.

PacifiCorp Response: Thank you for the suggestion. In response to this request, PacifiCorp intends to include a micro version, i.e., having a 0.1-megawatt nameplate capacity, of a distributed generation resource in the IRP model for the 2027 IRP. Including this in the model will facilitate the quantification of system benefits associated with its hourly shape. While not constituting endogenous modeling per se, given that this micro resource would be forced in the model, the company sees this pilot approach as

part of the commitment to continuous improvement based on public feedback, while having in mind that adding new resources to the model would normally not be admitted after the July 31st assumption lockdown.

(4) Request for PacifiCorp to provide Distribution System Costs and Resources to states outside of Oregon.

During the PIM #9, Shauna Thomas, the manager of the Distribution System Planning (DSP) group, presented on their work in Oregon. She indicated that the DSP resources developed for Oregon are available to all PacifiCorp states. We request that PacifiCorp present to stakeholders on how these resources are being used in PacifiCorp states outside of Oregon. In particular, hosting capacity maps, which are available in some areas in Oregon, are an important tool for determining locational value of DG. We request that PacifiCorp provide a timeline when such maps will be made available for Utah.

The Distribution System Planning (DSP) tools, methodologies, and analytical capabilities developed by PacifiCorp are available for use across the company's service territories. However, the Oregon DSP team was established to support compliance with Oregon's distribution system planning requirements under UM 2005 and therefore focuses its activities on Oregon-specific analyses, stakeholder engagement, and regulatory obligations. Expansion of DSP-related analyses or public-facing tools, such as hosting capacity maps, to other states would be subject to state-specific regulatory requirements, priorities, and funding decisions.

Shauna Thomas also said that "distribution spending is high." We request that PacifiCorp provide annual distribution system spending (in dollars and as a percent of total system costs) over time to demonstrate how these costs are changing. We suggest that using a decade of data would be informative (2015 through 2025). We request this data to be presented for the entire PacifiCorp system as well as for individual states in a future Public Input Meeting and in the 2027 IRP.

PacifiCorp does not publicly disclose distribution system investment data at the level of detail requested. Information regarding capital investments is addressed through applicable regulatory proceedings and reporting requirements.

The scope of PacifiCorp's Oregon Distribution System Planning (DSP) program is to support Oregon-specific planning activities and regulatory requirements under UM 2005. Accordingly, requests regarding distribution investment levels across PacifiCorp's multi-state system are outside the scope of the Oregon DSP program.

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.

Synapse Energy Economics and Lawrence Berkeley National Laboratory, *Best Practices in Integrated Resource Planning: A Guide for Planners Developing the Electricity Resource Mix of the Future* (January 2025). https://eta-publications.lbl.gov/sites/default/files/2024-12/irp_best_practices_2024_synapse_lbnl_24-061_0.pdf

---

Recommendations: Provide any additional recommendations if not included above - specificity is greatly appreciated.

* Required fields

Please submit your completed Stakeholder Feedback Form via email to IRP@Pacificorp.com
Thank you for participating.

* Required fields