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: 10/2/2026

*Name: Logan Mitchell, PhD

Title: Climate Scientist & Regulatory Manager

*E-mail: Logan@UtahCleanEnergy.org

Phone:

*Organization: Utah Clean Energy

Address:

City: State: Zip:

Public Meeting Date comments address: ☐ 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.

- Follow up regarding next generation geothermal supply side resource table

☐ 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.

In PacifiCorp's response to UCE's July 9, 2026 stakeholder feedback letter regarding geothermal parameters in the Supply Side Resource Table (SSRT), the IRP team stated:

"The 500 MW capacity of Cape Station is fully contracted with power buyers/offtakers. While PacifiCorp would be happy to consider low-cost firm capacity EGS opportunities like Cape Station, PacifiCorp has not been presented with such opportunities and does not believe that representing Fervo's aggressive cost reduction goals as the EGS proxy resource cost trend in the 2027 IRP supply-side resource table would accurately reflect the EGS opportunities in the market."

And recommended as a path forward the following:

"For the 2027 IRP supply-side resource table and PLEXOS modeling, PacifiCorp believes it would be reasonable to include a low-cost conventions geothermal or EGS resource option with limited availability in accordance with AEO's new geothermal cost estimates and Fervo Energy's EGS cost forecast, but for larger volumes of EGS, PacifiCorp plans to use 2024 NLR ATB EGS costs [of $7,353/kW] for use in the 2027 IRP supply-side table."

We are surprised by this response and do not think this is an adequate path forward and would like to provide further recommendations.

First, although we do not represent Fervo and are not making any claims on the company's behalf in this process, it is our understanding that Cape Station is not fully contracted with power buyers/offtakers. As evidence of that, within a couple of weeks of PacifiCorp's reply to our initial stakeholder feedback letter, Fervo announced another 396 MW PPA with Google, with the option of developing an additional 600 MW by 2030.[1] Beyond that, in Fervo's recent S-1 IPO filing with the SEC[2], they provided the following table about their generation portfolio, as of December 31, 2025 (with yellow highlighting indicating Utah resources):

As of December 31, 2025, our generation portfolio was comprised of the following:

GEOCLUSTER PORTFOLIO

GeoCluster	Location	Capacity Potential (MW)	Evaluated Land Position (Acres)	Phase	Status	Target COD	Size (MW)
Mature							
Cape	Utah	4,300	53,900	Cape I	Under Construction	2026/2027	100
				Cape II	Under Construction	2028	400
				Cape III+	Ready to Build	2029/2030	400
Corsac	Nevada	8,100	41,000	Corsac I	Ready to Build	2030	150
Pipeline							
Blanford	Utah	10,800	54,200				
Marble	Nevada	1,400	9,500				
Kit	Nevada	7,000	47,600				
Star	Idaho	1,700	7,100				
Fennec	Nevada	3,800	52,000				
Cross	Nevada	1,100	22,600				
Swift	Nevada	3,300	47,000				
Aspen	Nevada	600	5,000				
Prospects							
Additional Leases	California Idaho Nevada New Mexico Utah Washington	*Pending Review*	256,000				
Total		42,100	595,900				

Note: Capacity Potential estimates are based on "Best Estimate" HIIP estimates presented in reports prepared by D&M using assumptions regarding notional EGS development plans, ORC turbine efficiency, parasitic loads, and other assumed recovery factors, and are subject to change with additional data.

As shown, the Cape Station site has a Capacity Potential of 4,300 MW. With 900 MW now under contract (Cape I, II, and III+ Phases) presumably there is an additional 3,200 MW available for procurement at Cape Station. Even if Google procures an additional 600 MW by 2030, there would still be 2,600 MW of capacity available, which represents a significant available EGS resource.

Beyond Cape Station, the Blanford site, located near Delta, Utah, has a capacity potential of 10,800 MW. Fervo announced a successful appraisal well drilled at that site in February 2026 confirming the resource.[3]

Given that publicly available information, including Fervo's SEC filings, indicates there is *at least* 13,000 MW of EGS capacity potential in central Utah, it appears PacifiCorp's claim that those sites are "fully contracted" is inaccurate, which raises questions about whether the IRP team is fully accounting for recent industry developments in Utah. Therefore, our first request is for PacifiCorp's procurement team and IRP team to proactively reach out to Fervo to learn more about the status of Fervo's current project development portfolio. Or alternatively, PacifiCorp could issue an RFP or RFI for geothermal resources to invite all developers to provide updated information to inform the Company's assumptions.

Regarding PacifiCorp's proposed path forward for the SSRT and PLEXOS IRP modeling, it appears inconsistent with how PacifiCorp treats other resources in the IRP. PacifiCorp proposed creating two geothermal options. The first geothermal option represents low-cost (LCOE $37.58/MWh, overnight capital costs of $3,175/kW from AOE EMM) conventional geothermal with limited availability, but PacifiCorp did not specify what this availability is, nor whether the cost includes federal tax credits. We request that PacifiCorp provide their assumptions regarding conventional geothermal availability and invite feedback from stakeholders and the geothermal industry to determine whether it is a reasonable

assumption. We also ask that PacifiCorp provide the full details of the SSRT for these resources in their response so it is clear whether or not they are accounting for tax credits.

The second geothermal option is for larger volumes of EGS and PacifiCorp "does not believe" that Fervo's cost reduction goals accurately reflect the EGS opportunities in the market, so PacifiCorp is proposing to use the 2024 NLR ATB EGS overnight capital costs of $7,353/kW, which would imply an unsubsidized LCOE of around $100/MWh. However, with Fervo's 3.0 well design announced this summer, Fervo has claimed that they have successfully drilled wells that are wider diameter, deeper, and hotter than their prior wells. Fervo CEO Tim Latimer stated that "With this momentum from initial Phase II drilling, we expect Fervo's 3.0 well design to produce substantially more megawatts per well and significantly improve the unit economics of future GeoBlocks™. Based on our performance to date, we believe Cape Phase II is on track to deliver at $5,500 per kilowatt, and we remain firmly committed to our goal of achieving $3,000 per kilowatt."[4] Using capital costs of $5,500/kW would imply an unsubsidized LCOE of around $78/MWh. Applying the federal investment tax credit would reduce the CAPEX to approximately $3,850/kW, implying a subsidized LCOE of around $59/MWh. Fervo anticipates that Cape Phase II will have a commercial online date of 2028 (as shown in the table above).

Given this information, we request that PacifiCorp use the most relevant, up-to-date publicly available data on geothermal resources in the IRP model, with CAPEX cost of $5,500/kW in 2028 (which will likely decline into the future as the technology scales and more projects come on-line). Since this is an early-stage technology, it may be appropriate to provide additional resource characteristics in the SSRT. For example, in Public Input Meeting #5 from March 2026, on slide 118, additional resource characteristics were provided for 100-hour Iron Air storage resources, including an "Annual Production Limit" and "Production Expansion Rate."[5] We recommend PacifiCorp reach out directly to Fervo and determine reasonable values based on their known development capacity, including any supply chain constraints, for approximately five years into the future. For example, in April this year Fervo announced a framework agreement with Turboden (a Mitsubishi Heavy Industries Group company) to supply 1,750 MW of Organic Rankine Cycle (ORC) turbines over the next three years,[6] which would limit overall deployment capacity through 2029. Beyond five years, however, these limits should be lifted since there would be sufficient time for the industry to adapt to changing conditions.

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.

[1] Fervo-Google PPA announcement, Sept 1, 2026: https://fervoenergy.com/fervo-energy-and-google-sign-396-mw-ppa/
[2] Fervo IPO S-1, April 17, 2026: https://www.sec.gov/Archives/edgar/data/1853868/000162828026025821/fervoenergy-sx1.htm
[3] Blanford Appraisal well press release, Feb 9, 2026: https://fervoenergy.com/fervo-energy-drills-hottest-well-to-date-at-new-giga-scale-geothermal-project-site/
[4] Fervo's third generation well design press release, July 8, 2026: https://fervoenergy.com/fervo-energy-learning-curve-continues-on-3rd-generation-well-design-boosting-drilling-rates-by-143-since-its-first-cape-station-well/
[5] March 11-12 Public Input Meeting: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2027-irp/PacifiCorp_2027_IRP_PIM_5.pdf
[6] Fervo's framework agreement with Turboden, April 7, 2026: https://fervoenergy.com/fervo-energy-and-turboden-announce-new-1-7-gw-turbine-supply-framework-agreement/

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

1. PacifiCorp's procurement team and IRP team should proactively reach out to Fervo to get more information on Fervo's project pipeline and development status. Or alternatively, PacifiCorp could issue an RFP or RFI for geothermal resources to invite all developers to provide updated information to inform the Company's assumptions. This information should be used in the 2027 IRP process.
2. We request that PacifiCorp clarify their assumptions on low-cost conventional geothermal capacity availability. Please provide the full details of the SSRT in the response so it is clear whether tax credits are included.
3. We reiterate our request that PacifiCorp use the most relevant, up-to-date data on geothermal resources in the IRP model, which for EGS, would be CAPEX costs of $5,500/kW and falling into the future to $3,000/kW. We recommend that CAPEX costs of $5,500/kW be used in the year 2028 and these are linearly interpolated to $3,000/kW in 2035 and remain flat after that.

* Required fields

a. It may be appropriate to specify an "Annual Production Limit" and "Production Expansion Rate" for EGS within PLEXOS, as is done with 100-hour Iron Air Batteries. Such limits and rates should be established in consultation with developers (i.e. Fervo) and stakeholders to ensure accuracy.

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

PacifiCorp Response:

Thank you for your feedback.

PacifiCorp appreciates the feedback that the company should more proactively seek out geothermal resource opportunities. The Company has engaged, and will continue to engage, with geothermal developers and industry experts.

PacifiCorp apologizes for any confusion that may have been caused by PacifiCorp's statement in its response to UCE's public input form submitted on July 9, 2026, that "the 500 MW capacity of Cape Station is fully contracted with power buyers/offtakers." This statement was not intended to claim that all of the potential of the Cape Station site is fully contracted with power buyers/offtakers. Instead, this statement merely recognizes that the first 500 MW of the Cape Station site (Cape Station Phase I and II) already have commercial contracts in place, as stated in the SEC Registration Statement filed on April 17, 2026, and the economics presented by Fervo for its Cape Station site may not be representative of future offtake agreements.

Including a reasonable resource cost estimate for proxy geothermal resources is critical to analyze the cost competitiveness of geothermal resources to other resource types included in PacifiCorp's IRP. As is the case with all proxy resource options PacifiCorp models in its IRP, PacifiCorp hopes to avoid sending a signal to the market that PacifiCorp is not interested in any particular resource type because the costs are too high, or that PacifiCorp is only interested in any singular resource type because the costs PacifiCorp has modeled show a particular resource type is the "best" option amongst the various resource options PacifiCorp has modeled. At the prices stated by Fervo with tax credits included, PacifiCorp anticipates proxy geothermal would be economic and the model would select proxy geothermal over other proxy resource options like gas. Without tax credits, PacifiCorp anticipates the prices stated by Fervo would still make proxy geothermal competitive with proxy gas in the IRP model.

While PacifiCorp previously planned to model multiple proxy geothermal resource options in its 2027 IRP, PacifiCorp believes the best option for the 2027 IRP is to model a single geothermal resource option in limited quantities based on Fervo's cost estimates along with estimates from the 2025 NLR ATB where Fervo cost estimates are not available. While enhanced geothermal systems may be a more mature technology than other types of emerging technologies, PacifiCorp is hesitant to allow significant quantities of proxy geothermal to be selectable in the model at the low prices stated by Fervo. Not only is it highly uncertain if PacifiCorp could procure geothermal resources at these prices, PacifiCorp is also highly skeptical that pricing agreements would pass through the value of any tax credits to the company, ultimately making the costs of the resource much higher than anticipated.

For the 2027 IRP, PacifiCorp is planning to model a single proxy near-field enhanced geothermal system (NF EGS) binary resource option limited to 500 MW selectable in both Oregon and Utah for the entirety of the study horizon, first eligible in 2030. The costs for the proxy geothermal resource option would be based on Fervo's cost estimates, beginning with an overnight capital cost of $5,500 per kilowatt in 2030 and declining to $3,000 per kilowatt by 2036. From 2037 onward, PacifiCorp plans to apply a cost escalation aligned with the overnight capital cost forecast assumed for the moderate case enhanced geothermal system resource option in the recently posted 2025 NRL ATB.[1] In addition to Fervo's capital costs, PacifiCorp plans to use fixed operation and maintenance costs forecasted in the 2025 NLR ATB and will incorporate applicable tax credits in its proxy geothermal costs. PacifiCorp believes this approach to modeling proxy geothermal in its 2027 IRP is reasonable and will send a meaningful market signal if geothermal is selected by the model while protecting against the risks and uncertainties surrounding the costs and availability of new geothermal resources. Detailed cost breakdowns of the 2027 IRP proxy geothermal resource option, along with all other proxy resource options

[1] Data | Electricity | 2025 | ATB | NLR

* Required fields

included in the 2027 IRP, will be included in the final supply-side resource table that will be posted to PacifiCorp's IRP website along with the October 14th, 2026 public input meeting.

* Required fields