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: October 8, 2026

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Public Meeting Date comments address: 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.

The Conservation Potential Assessment final results for Energy Efficiency (EE) and Demand Response (DR) were presented at the August 26, 2026 Public Input Meeting. The EE results were presented by DNV, and the DR results were presented by Brattle Group. Utah Clean Energy (UCE) appreciates the opportunity to provide feedback on these presentations.

For EE, the most notable results were an "Overall 40% Decrease in 21-Year Residential Potential Compared to 2025 CPA (Non-Oregon States)" [PIM #9, Slide 37] and an "Overall 13% Decrease in 21-Year Non-Residential Potential Compared to 2025 CPA (Non-Oregon States)" [PIM #9, Slide 39]. While it is accepted knowledge that the most easily achievable EE measures have already been realized, the scale of this difference, especially over just a two-year period from 2025 to 2027, necessitates further scrutiny.

For DR, the Brattle Group presented results for "base costs" as well as for a new "high-cost tier" which captures additional participation at higher incentives. Both the summer and the winter potential exceeds the 2025 CPA, even without EV bidirectional charging and the high-cost scenario. UCE is appreciative that the Brattle Group prepared the new high-cost tier for evaluation of the value of DR resources, as this tier provides valuable information to help inform the implementation of DR programs in Utah and across the utility's service area.

☐ 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.

(1) Feedback and Request for Further Analysis of Modeling Assumptions and Methodology in the EE portion of the 2027 CPA.

* Required fields

UCE is concerned with the large reduction in EE potential in the 2027 CPA. We are interested in better understanding the difference in modeling methodology and assumptions between the 2025 CPA and the 2027 CPA. Because modeling results are inherently driven by initial assumptions, we are interested in particular scrutiny of the results for the year 2027.

On Slide #36 of the PIM #9 presentation, the 2025 CPA results are plotted against the annual results for each PacifiCorp state. For 2027, the 2025 CPA found system-wide Incremental Achievable Technical Potential (IATP) of ~740 GWh/yr at Generation [as estimated from Slide 36]. The 2027 CPA found system-wide Incremental Achievable Technical Potential (IATP) of ~640 GWh/yr at Generation [as estimated from Slide 36]. The 2027 IATP for the state of Utah is ~280 GWh/yr [as estimated from Slide 36]. However, according to Rocky Mountain Power, the EE achieved in Utah in 2025 was 386 GWh/yr[1] and the EE forecasted for 2026 was 308.5 GWh/yr[2]. The table below summarizes this information with the orange highlighted cells all reporting Incremental Achievable Technical Potential, whereas the other cells are reporting EE achieved or forecasted in Utah.

Year	Utah EE Actual (GWh/yr)	2025 CPA Utah EE IATP[3] (GWh/yr)	2027 CPA Utah EE IATP (GWh/yr)	2025 CPA System-wide IATP (GWh/yr)	2027 CPA System-wide IATP (GWh/yr)
2025	386 (achieved)	224			
2026	308.5 (forecasted)	270			
2027	NA	332	280	740	640

Why is the Incremental Achievable Technical Potential ***less than*** the actual savings achieved? For example, 386 GWh of EE was achieved in 2025, and yet the 2025 CPA (which was produced in 2025), only reports an IATP of 224 GWh.

Given that the results presented are "Incremental Achievable Technical Potential", we would expect that the IATP should always be greater than the EE achieved. If this isn't the case, then the IATP does not appear to actually be the upper bounds of what is achievable. Given that resource planning is using this information as an input, we would like to understand the modeling assumptions and the data underlying these assumptions, and modeling results in light of the actual achieved EE resources. We would appreciate a presentation by DNV at the next PIM in October 2026 to discuss this discrepancy and how it can be addressed prior to final IRP PLEXOS modeling for the 2027 IRP.

DEFINITION:
"Achievable Technical Potential – This case refines technical potential by applying customer participation rates that account for market barriers, customer awareness and attitudes, program maturity, and other factors that may affect market penetration of DSM measures. For the current CPA, AEG used achievability assumptions from The Council's Draft 2021 Power Plan as the customer adoption rates, which typically assume that 85% of the

[1] From *Q2 2026 UT DSM Accounting Report.xlsx*, provided to the Utah DSM Steering Committee by Michael Snow of Rocky Mountain Power on July 29, 2026.
[2] From *2025 DSM Annual Report, Table 2*, https://pscdocs.utah.gov/electric/26docs/2603524/345626RdctdRMP2025DSMRprt6-1-2026.pdf.
[3] From https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025-irp-support-studies/PacifiCorp_2025_CPA_Report_Vol_1.pdf, Figure 4-1 and 4-2 and from the associated Excel file for Appendix H, *2025_CPA_Appendix_H_Energy_Efficiency_Detailed_Results.xlsx* obtained from: https://www.pacificorp.com/energy/integrated-resource-plan/support.html.

* Required fields

technical potential could be acquired over 20 years, but go up to 100% for specific measures. This achievability factor represents the potential that can reasonably be acquired by all mechanisms available, including utility programs, improved codes and standards, and market transformation. Thus, the market applicability assumptions utilized in this study include savings outside of utility programs." – pg 21 From *PACIFICORP CONSERVATION POTENTIAL ASSESSMENT FOR 2025-2044 Prepared for: PacifiCorp By: Applied Energy Group, Inc. Date: March 31, 2025 Volume 1*
https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025-irp-support-studies/PacifiCorp_2025_CPA_Report_Vol_1.pdf

PacifiCorp Response:

Demand-side management (DSM) annual report savings and Conservation Potential Assessment (CPA) potential are not directly comparable without adjustments because of the unique impact of dual fuel heat pump savings and Home Energy Reports (HER) savings. These two categories of energy efficiency (EE) savings are counted in annual reporting as achievements but are not explicitly included in the CPA as line items because of their treatment in the Integrated Resource Plan's (IRP) load forecast: dual fuel heat pump claimed savings do not impact net load in the IRP (though they are counted in the CPA's state-specific market profile baselines), and the HER savings are already embedded within the load forecast so are excluded from the CPA to avoid double counting them. Adding those two savings categories plus the CPA total potential yields a closer "apples to apples" comparison with annual reporting for informational purposes. In fact, when accounting for dual fuel heat pumps and HER savings, the 2027 CPA's first-year potential (i.e. for 2027) actually increases by 12% compared to the 2025 CPA's first year potential (i.e. for 2025), though there is an overall reduction out 21 years by the end of the study horizon compared to the 2025 CPA.

This is in line with discussion in the 2027 IRP Public Input Meeting (PIM) #9 held in August 2026. During that meeting, UCE representatives asked similar questions on the residential EE results slide #38, "The 2027 [stacked bars for all states combined] look to be maybe around 200 GWh. Utah achieved 268 GWh in 2025, so it seems surprising that your achievable potential in 2027 is potentially lower than what was realized in just one state in 2025." While Utah's *residential* program in 2025 achieved 79 GWh and the portfolio as a whole achieved 268 GWh not counting HER savings (see table below), ICF staff presenting the CPA slides responded accurately by stating, "That may be related to the difference between the net impact on the load in regard to what you get for cumulative potential as opposed to claimed program savings. Some of that [difference] may be also the inclusion of the home energy reports, which are already baked into the load forecast for the purposes of this study." ICF went on to state, "[The change from last study] reflects the drivers of change [discussed in a previous presentation] as well as the claiming of equivalent dual fuel heat pump savings which take up a good proportion of the claimed program savings, but we're not evaluating fuel switching measures here: we're reflecting the increasing saturation of dual fuel heat pumps in the baseline already because there's no clean way to account for that difference between claimed savings and the impact on the load from those measures which have gotten quite popular over recent years."[1]

The following table includes dual fuel heat pump savings and HER savings to allow a crosswalk between the annual reporting and the CPA. Once accounted for, it shows total Utah DSM savings of 421

[1] See recording of PacifiCorp's IRP Public Input Meeting #9 at timestamp 1:58:30. Available online: https://www.youtube.com/watch?v=9Xaje7Hpssk

* Required fields

GWh for 2027, which is higher than the 2025 annual report and the 2026 forecast.

Table 1. PacifiCorp's Utah DSM Savings (GWh at Gen)

Row	DSM Savings, GWh (at gen)	Included in CPA?	2025 Annual Report	2026 Forecast	2027 CPA: 2027 Potential
A	Residential (WSH): Dual Fuel Heat Pump Claimed Savings	No	32	34	34**
B	Residential (WSH): Non-Dual Fuel Heat Pump Savings	Yes	47	51	47
C = A+B	Total Residential (WSH)		79	85	81
D	Home Energy Report Savings	No	117	102	102**
E	Non-Residential Savings (WSB)	Yes	189	223	238
F = C+D+E	**Total Savings, All Categories***		**386**	**410**	**421**
* Totals may not sum exactly due to rounding. ** Assumes the 2026 levels of savings for dual fuel heat pumps and the HER program stay constant into 2027, for informational purposes. Actuals may vary.					

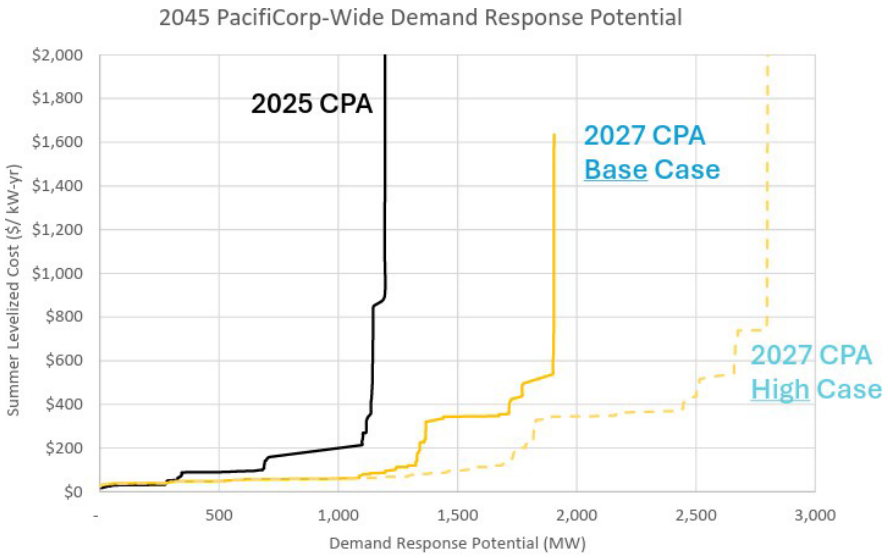
Additionally, PacifiCorp would like to clarify two points for the record: It is ICF that conducts the CPA on behalf of the Company, not DNV (who conducts the Distributed Generation Study), and UCE's footnotes 1 & 2 appear to be reversed (i.e. references to the 2025 annual report and the Q2 2026 accounting forecast).

(2) UCE acknowledges the high potential for cost-effective DR as indicated from the 2027 CPA results.

UCE appreciates that PacifiCorp included the "high-cost tier" for DR potential and we encourage the utility to build out DR programs that are capable of achieving the additional DR savings capacity after the CPA and IRP are finalized. In Utah, the cumulative summer potential by 2047 is increased by 500 MW (over 50% of base case) for the high-cost scenario. The cumulative winter potential by 2047 is increased by about 400 MW (almost double the base case) for the high-cost scenario. These results are indicative of the high potential of these programs when customers are provided additional incentives. Additionally, bidirectional EV charging has the potential for about 250 MW by 2047 in both summer and winter, depending on technological advancements.

One of the notable results from the 2027 CPA is the demand response summer potential curves provided on Slide 68 and copied below [PIM #9, Slide 68]. These curves indicate that the summer levelized cost of demand response is low for much greater DR potential than it was in the 2025 CPA. For the 2025 CPA, the summer levelized cost was below $100/kW-yr up to about 700 MW DR potential. In the 2027 CPA Base Case, however, the levelized cost remains below $100/kW-yr up to about 1,250 MW DR potential, while the 2027 CPA High

Case remains at or below $100/kW-yr up to about 1,700 MW DR potential. This represents high cost-effective potential for up to 1,000 MW more DR resources than in the 2025 CPA in the 2027 CPA High Case. Given this, and the overall results for the 2027 CPA, we look forward to seeing increased levels of DR chosen as part of the 2027 preferred portfolio.



Note: Program startup costs are not reflected in the supply curve. Potential includes existing and planned resources. Axis cropped at $2,000/kW-yr. We show 2045 potential to be comparable across CPA iterations. Potential includes 600 MW of existing and planned resources that will be netted out and modeled separately in the IRP.

PacifiCorp Response:

Thank you for your feedback.

Thank you for providing the opportunity to provide feedback on the CPA results for the 2027 IRP.

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