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## DIVISION COMMENTS ON PACIFICORP'S 2013 IRP

To: Utah Public Service Commission

From: Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Energy Section Manager

Charles E. Peterson, Technical Consultant

Brenda Salter, Technical Consultant

Joni Zenger, Technical Consultant

Date: September 9, 2013

Re: Docket No. 13-2035-01, PacifiCorp's 2013 Integrated Resource Plan

### RECOMMENDATION (DO NOT ACKNOWLEDGE)

The Division of Public Utilities (Division) recommends that the Public Service Commission (Commission) not acknowledge PacifiCorp's 2013 Integrated Resource Plan (IRP) and Action Plan. As explained below, the Division finds the 2013 IRP does not fully meet the Standards and Guidelines,<sup>1</sup> and falls short of meeting the directives from the Commission's April 1, 2010 IRP Order.<sup>2</sup> In addition, the Division cannot verify the adequacy of the Action Plan nor can the Division either confirm or deny that the plan results in a preferred portfolio that is the least-cost, least risk portfolio. Finally, the Division suggests improvement measures for future IRPs and requests the Commission consider and implement such measures.

<sup>1</sup> Docket No. 90-2035-01, Report and Order, June 18, 1992.

<sup>2</sup> Report and Order, Docket No. 11-2035-01, March 22, 2012.