

June 3, 2016

PacifiCorp – IRP Department
825 NE Multnomah, Suite 600
Portland, Oregon 97232

RE: Recommendations for discussion topics for 2017 IRP Utah Stakeholder Input Meeting

Utah Clean Energy hereby submits recommendations for discussion topics for the Utah Stakeholder Input Meeting for 2017 IRP to be held on Monday, June 13, 2016.

1. We would like to discuss the inclusion of customer side technologies, such as storage, demand response, time of use rates and electric vehicles in the 2017 IRP, and how these technologies and resources affect the load forecast, load management and resource values.
2. Utah Clean Energy would like to discuss how best to model distributed energy resources, such as solar, storage, and demand response in the 2017 IRP, given their rapid deployment, proliferation of smart inverters, changes to IEEE standards, new technologies, and declining costs.
3. Given the significant distributed energy resource potential and their rapid deployment, we would like to discuss greater consideration of distribution system planning as a part of the 2017 IRP. For example, what kind of changes should be made to the distribution system planning process to enable greater, more transparent, and targeted deployment of distributed energy resources to enhance their value to the utility system?
4. How is PacifiCorp planning to model Clean Power Plan compliance or compliance with future carbon regulations?
5. How will the EPA's recent regional haze ruling affect cost effectiveness analysis for Hunter and Huntington and how does PacifiCorp plan to achieve compliance to the ruling?
6. In the past, the DSM selected by the IRP was a presumptive floor; however, in recent years this has changed such that all cost-effective DSM in the IRP is viewed as a cap. We would like to discuss this in more detail.



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7. A good discussion topic would be utilizing the utility cost test as the resource cost, across PacifiCorp's territory, for DSM programs in IRP modeling. We are not suggesting that all states adopt the utility cost test for program evaluation or approval purposes; rather, we suggest that in order to more fairly compare supply-side and demand-side resources on a consistent and comparable basis, it would be more accurate to model the utility's actual resource cost as reflected in the utility cost (as opposed to the total resource cost, which includes customer costs). Such a change should not impact DSM program approval in individual states, which would still be based on individual states' cost test preferences. In addition to discussing this at the Utah Stakeholder meeting, we request that this be a discussion item in other states too.

We appreciate the opportunity to provide our input for this meeting. Thank you for your consideration.

Sincerely,

Mitalee Gupta

Program and Policy Associate

UTAH CLEAN ENERGY