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To: Public Service Commission

From: Division of Public Utilities
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Subject: *In the Matter of the Acknowledgment of PacifiCorp's 2008 Integrated Resource Plan*: Docket 09-2035-01 (Filed on April 8, 2009 as "Draft 2008 Integrated Resource Plan").

Date: June 18, 2009

TRANSMITTAL:

This letter transmits the Division of Public Utilities' Report and Recommendations (Report) regarding the PacifiCorp's 2008 Integrated Resource Plan.

RECOMMENDATION (Non-Acknowledgement)

The Division of Public Utilities (Division) recommends that the Utah Public Service Commission (Commission) not acknowledge PacifiCorp's (Company) 2008 Integrated Resource Plan (IRP) and Action Plan. As explained in the attached Report, the Division believes that PacifiCorp has not complied with a significant number of the Commission's

IRP Standards and Guidelines (Docket No. 90-2035-01, “Report and Order,” dated June 18, 1992).

The Division also recommends revising a number of standards and guidelines. Also, given our findings in the current IRP, our recommendation of non-acknowledgement of the 2007 IRP, and the previous non-acknowledgement, the Division recommends that the Commission reassess the overall usefulness of the IRP. In particular, the Division is concerned with the timing and scheduling of the overall IRP process. The Division is additionally concerned with the apparent inability of the Company to satisfy the Commission’s IRP requirements. The PacifiCorp IRP’s increasing complexity along with the apparent need to satisfy multiple interests are likely contributing to the IRP’s declining usefulness and lack of compliance with Commission guidelines. These concerns, with a positive recommendation for moving forward, were also made in the previous IRP non-acknowledgement memorandum.

The Division appreciates the effort of PacifiCorp’s IRP Team, the preparation for the meetings, the responsiveness to data requests for the most part, and the production of the IRP itself. The Division recognizes improvements that the Company has worked on and continues to work on to improve the modeling, accuracy, and results of the IRP. The Division recognizes the difficulty of producing a document encompassing resource planning for six service territories that will satisfy the varied needs and requirements of every stakeholder group.

Cc: Pete Warnken, PacifiCorp
Dave Taylor, PacifiCorp
Michele Beck, Office of Consumer Services

