

# PacifiCorp - Stakeholder Feedback Form

## 2015 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 2015 IRP, including, but not limited to the process, assumptions, and analysis. In providing your feedback, PacifiCorp requests that the stakeholders identify whether they are okay with the Company posting their comments on the IRP website.

Yes  No May we post these comments to the IRP webpage?

Date of Submittal 8/22/2014

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\*Organization: Citizens' Utility Board of Oregon

Address: 610 SW Broadway, Ste. 400

City: Portland

State: Oregon

Zip: 97205

Public Meeting Date comments address: 7/18/2014

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

[Click here to enter text.](#)

**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Carbon scenario analysis

Check here if any of the following information being submitted is copyrighted or confidential.

**\*Respondent Comment:** Please provide your feedback for each IRP topic listed above.

The Company has stated its interest in stakeholder opinions regarding a combined 111(d) and carbon price scenario. CUB understands that PacifiCorp believes that a combined scenario is superfluous as the same level of emissions reduction can be accomplished in an either-or analysis. CUB disagrees. CUB believes that while the 111(d) draft rule is a starting point in determining a low-carbon future, it does not take into consideration regional or state goals that may prove to be more aggressive in the future. It also does not take into consideration potential interactive effects as a result of both a carbon price and a 111(d) framework. Even in cases where federal 111(d) goals are satisfied, the addition of a regional or statewide carbon price may lead to a different scenario of resources. For this reason, CUB would like to see an analysis that observes the interaction between 111(d) and a carbon price. PacifiCorp's service territory covers a number of states that may impose more rigorous carbon regulation than 111(d), and in order to prepare a resource analysis for such a future, CUB believes that it is prudent to analyze the combined impact of 111(d) and a carbon price.

**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.

CUB proposes the following scenario:

CUB recommends, in addition to a separate 111(d) default scenario and the separate carbon price only scenario, a synthesis of a carbon price with the 111(d) framework. The carbon price can start at \$16.00 per short ton, beginning in 2022, escalating at a rate of 4.8% a year. This is almost equivalent to PacifiCorp's CO2 base carbon price scenario on page 168 of its 2013 IRP.

\* Required fields

CUB agrees with the Company that the 111(d) proposed rule is still subject to scrutiny and change, however, this does not mean that we should assume that all other expectations of carbon regulation will be abandoned as a result of federal carbon policy.

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Thank you for participating.