

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. Submit form and related documents to the IRP e-mail: IRP@PacifiCorp.com.

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

Date of Submittal 10/20/2014

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Title: Attorney

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Phone: 503-241-7242

*Organization: Industrial Customers of Northwest Utilities

Address: 333 SW Taylor, Suite 400

City: Portland

State: OR

Zip: 97204

Public Meeting Date comments address: [Click here to enter date.](#) Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Bradley Mullins, Consultant

***IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.
Carbon scenarios, 111(d) strategies, and direct access projections

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.
Please see attached letter.

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.

Attached Letter: ICNU Comments Regarding PacifiCorp's 2015 Integrated Resource Plan

Recommendations: Provide any additional recommendations if not included above - specificity is greatly appreciated.
[Click here to enter text.](#)

Thank you for participating.

* Required fields

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October 20, 2014

Via Electronic Mail

IRP@PacifiCorp.com

Re: ICNU Comments Regarding PacifiCorp's 2015 Integrated Resource Plan

Dear IRP Staff:

The Industrial Customers of Northwest Utilities ("ICNU") welcomes this opportunity to submit comments on PacifiCorp's (the "Company") 2015 Integrated Resource Plan ("IRP"). ICNU is a non-profit trade association representing large industrial energy users in the Pacific Northwest, many of which take electric service from the Company. Accordingly, ICNU's members will be directly impacted by the resource decisions made in the Company's 2015 IRP.

ICNU is concerned with what it views to be aggressive carbon forecasts included in cases C13 and S11. For example, ICNU is concerned with the proposal in Case S11 to include carbon costs at \$162/ton by 2034, the end of the 2015 IRP planning horizon. ICNU views this to be an unrealistic estimate of carbon costs, even as a bookend. This is of particular concern since the Environmental Protection Agency's proposed rules under section 111(d) will likely mitigate the expectation of a broadly applied carbon tax policy of the magnitude contemplated in cases C13 and S11.

ICNU is also concerned with the various 111(d) strategies proposed by the Company. ICNU is concerned that the Company is proposing to make resource decisions that are premised upon this rule, which has not been finalized and the mechanics of which are not yet fully understood. At this point it is not clear how the 111(d) rules will be applied to the Company. ICNU does not believe that it is accurate to assume that these rules will require unilateral actions and resource decisions on the part of the Company, when the individual states are responsible for developing the implementation plans necessary to comply with the 111(d) rules. The strategies outlined in the Company's 111(d) strategies matrix are premature, and, in ICNU's view, it would be imprudent to rely on those strategies to make major resource decisions until there is more certainty regarding how specifically these rules will apply.

Finally, PacifiCorp should account for projected future loads that select permanent direct access and remove these loads from the amounts that the Company is expected to serve. As a guideline, PacifiCorp should at least match the amount of permanent direct access load in its IRP with what is projected in Company modeling in other proceedings—e.g., the Company's five-year opt-out program in Oregon Public Utilities Commission Docket No. UE 267.

ICNU appreciates the opportunity to submit these comments regarding the Company's 2015 IRP, and looks forward to working with the Company as these matters are discussed further.

Sincerely yours,

/s/ Jesse E. Cowell
Jesse E. Cowell

cc: John Carr