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 Click here to enter date.

*Name: Crystal J. McDonough Title: **Attorney, Pathfinder Law Offices**

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*Organization: Northern Laramie Range Alliance (“NLRA”)

Address: PO Box 336847

City: **Greeley** State: **CO** Zip: **80634**

Public Meeting Date comments address: **7/17/2014** ☐ Check here if not related to specific meeting

List additional organization attendees at cited meeting: **NLRA attorney Crystal McDonough attended via phone.**

***IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.
Environmental Policy
Renewable Portfolio Standards
Transmission

☐ 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.
NLRA’s concern with respect to development of the Company’s 2015 IRP is straightforward: Will it, in the end, fulfill PacifiCorp’s overriding obligation to ensure reliable electric service at the lowest practicable cost for the customers that rely on it?

We note at the outset that this objective has been served admirably in recent years – including through periods of substantial load growth - through the Company’s diversified generation portfolio of hydro, coal and gas, delivered through a well-developed transmission network.

The good news today, of course, is that advances in energy efficiency and conservation, together with developments in grid-management technology, create the prospect that the Company will be able to sustain this excellent record without acquisition of incremental generating capacity or the capital expense associated with additional transmission infrastructure. This appears to have been a dominant theme in the 2013 IRP, and there has been nothing in the basic demand-supply situation suggesting a change for 2015.

Unfortunately, however, the federal government and certain of the local jurisdictions in the Company’s service area are putting this record of low-cost, reliable service at risk:

- At the federal level, pending EPA regulation (Proposed Rule 111(d) under the Clean Air Act), if it is adopted and survives legal challenges, could force the Company to phase out coal-fired generation before the end of coal plants’ useful lives. Even the lowest-cost replacement for coal’s energy and capacity contribution (combined-cycle gas turbine generation) would require capital outlays before they otherwise would have been required, and the resulting costs will be passed along to ratepayers.

- Action at the state level makes the situation even more difficult. Several states in the Company’s service area have adopted “renewable portfolio standards” (RPS) requiring some minimum share of the energy in the Company’s system to be generated by more expensive and less reliable technologies such as wind and solar (and not, sadly, natural gas, which could halve carbon emissions at much lower cost and without sacrificing reliability/capacity-contribution). In addition to their erratic and unpredictable contribution

* Required fields

to system energy and capacity, the economics of these technologies depends heavily on the availability of extensive government subsidy that itself is unpredictable. The Company still will be required to meet demand requirements from predictable sources such as gas, coal and hydro, but will have to incur the excess costs associated with adding RPS-qualified technologies to its generation portfolio.

The foregoing issues apply system-wide across the company's service area. But for NLRA, whose members are in the Wyoming portions of the service area, the issues are even more difficult:

- There appears to be a developing consensus - encouraged by recent changes in RPS requirements in California and Washington to no longer favor renewable energy generated in-state – that wind energy generated in Wyoming will make a major contribution to the Company's satisfying RPS in those other states. The Washington legislator sponsoring the bill allowing the Company to count Wyoming wind against its Washington RPS specifically focused the legislation on NLRA's area of concern in Eastern Wyoming. In effect, Wyoming would become a sacrifice zone enablingWashington State to indulge its desire to adopt RPS without the destructive landscape and wildlife impacts of industrial-scale wind facilities and the associated transmission infrastructure.

- There remains substantial uncertainty with respect to the ability of the Company's "multistate protocol" to protect Wyoming consumers from the higher and unpredictable costs associated with wind and solar generation. At a bare minimum, ratepayers in Wyoming and other non-RPS states will have to be confident that they will bear none of the costs associated with generation developed to meet RPS requirements, or with the transmission infrastructure necessary to deliver it. These costs should – and must – be borne by ratepayers in the states adopting these requirements. NLRA strongly urges the Company to establish such a policy immediately, and then to conduct the studies necessary to inform public utility commissions, legislators and the general public, across its service area, as to the full capital and operating cost implications of compliance with RPS. This would ensure that – even in states with current RPS – decision-makers and the public they serve have complete information on the basis of which to decide whether to continue these policies. This is especially important given recent work at the Brookings Institution and elsewhere suggesting that the costs of wind power (and other forms of renewable energy) have been understated.

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.
Click here to enter text.

Recommendations: Provide any additional recommendations if not included above - specificity is greatly appreciated.

Thank you for participating.

* Required fields