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Department of Commerce  
Division of Public Utilities

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**To:** Utah Public Service Commission

**From:** Utah Division of Public Utilities

Chris Parker, Director

Artie Powell, Manager

Joni Zenger, Technical Consultant

**Date:** February 27, 2019

**Re:** **PacifiCorp's 2019 Integrated Resource Plan, Time Extension Request, Docket No. 19-035-02**

### **Recommendation (Approve)**

The Utah Division of Public Utilities (“Division”) has reviewed the filing made by PacifiCorp (“the Company”) and recommends that the Public Service Commission (“Commission”) approve the request for an extension of time in filing its 2019 Integrated Resource Plan (“IRP”) to no later than August 1, 2019.

### **Issue**

On January 28, 2019, the Company filed a request to extend the March 31 deadline for filing the 2019 IRP to no later than August 1, 2019.<sup>1</sup> The reason stated by the Company for the need of the extension is related to the ongoing coal analysis the Company is conducting parallel to the IRP process. The Company states the coal analysis could impact the development of a least-cost,

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<sup>1</sup> PacifiCorp, PacifiCorp's 2019 Integrated Resource Plan, January 28, 2019.  
<https://pscdocs.utah.gov/electric/19docs/1903502/306394RMPReqExt1-28-2019.pdf>

least-risk portfolio and that it should be allowed to fully analyze coal unit economics before concluding the IRP process.

## **Discussion**

The Division agrees that the coal unit economic analysis needs to be completed before concluding the IRP process. Though the initial assessment showed that some coal units may be candidates for early retirement, the Division emphasizes that those results did not include the reliability impacts and potential costs that such retirements would have on the system.

At the February 21, 2019 IRP stakeholder conference call, the Company stated that it has made progress on the reliability and capacity shortfall impacts of early coal retirements and expects to present its completed findings at the March 21-22, 2019 public input meeting. The completed coal analysis is necessary in order for the Company to develop its core portfolio cases, which will be run through the Company's computer models to develop the preferred portfolio.

The Company has assured stakeholders that it will continue to host monthly public input meetings to keep stakeholders involved and allow opportunity for public input up until the requested August 1, 2019 filing date.

The Division reminds the Company that deviations from the March 31 IRP filing timeline should be rare. In the past the Company has filed late IRPs, and the Division's recommendation in this instance of an extension comes with a reminder that the IRP is a long-term planning tool that requires the Company to plan to ensure it meets its March 31 filing deadline of its IRP on each odd-numbered year and its IRP Update on March 31 of each even-numbered year. Late filings should not become a regular occurrence. There are likely to be elements of any IRP that might be better developed with more time, but that should not lead to delays in most instances.

Furthermore, delays can detach the filing from the input process designed to inform it. By the time stakeholders have reviewed the IRP, it is possible that many of the inputs to the models could be outdated and have changed, making the results of the IRP model runs less informative. Further, stakeholders need an opportunity to review the IRP and provide comments before the IRP Update is filed.

## **Conclusion**

The Division has reviewed the Company's request for an extension to file its 2019 IRP on August 1, 2019, rather than on March 31, 2019. The Division recommends the Commission approve the extension in this instance due to the need for the Company to complete the reliability and capacity shortfall results of its coal retirement analysis in this IRP. The Division requests that the Commission require the Company to continue public stakeholder meetings and remind the Company that future IRPs need to be filed on March 31 of each odd-numbered year with an IRP update filing on March 31 of each even-numbered year.

Cc: Yvonne Hogle, Rocky Mountain Power  
Michele Beck, Office of Consumer Services