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DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
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To: Utah Public Service Commission

From: Office of Consumer Services  
Michele Beck, Director  
Béla Vastag, Utility Analyst

Date: February 27, 2019

Subject: PacifiCorp's 2019 Integrated Resource Plan - Docket No. 19-035-02

## Background

On January 28, 2019, Rocky Mountain Power (Company) filed with the Public Service Commission of Utah (Commission) a request for an extension of the filing deadline for PacifiCorp's 2019 Integrated Resource Plan (IRP) from April 1, 2019 to no later than August 1, 2019. On January 29, 2019, the Commission issued a Request For Comments in this matter with initial comments due February 27, 2019.

Accordingly, the Utah Office of Consumer Services (Office) provides the following initial comments on the Company's request to extend the 2019 IRP filing deadline.

## OCS Comments

Per direction from the Oregon PUC<sup>1</sup>, the Company performed unit-by-unit early retirement studies for its coal-fired generating units and presented initial results at the June 28, 2018 IRP stakeholder meeting. In the June meeting, the Company cautioned that these were only initial results and that additional modeling would be needed to assess system reliability and numerous other issues. Most stakeholders, including the Office, supported a robust economic analysis of the Company's coal units, including moving forward on

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<sup>1</sup> In its 2017 IRP acknowledgement order (Order No. 18-138), the Public Utility Commission (PUC) of Oregon established requirements for additional coal unit analyses, to be provided by June 30, 2018. PacifiCorp agreed to perform 25 System Optimizer model runs, one for each coal unit and a base case.

improvements to the initial retirement analysis. Since the June 2018 meeting, the Company has continued to perform coal unit retirement analyses, presenting results at IRP stakeholder meetings on November 1, 2018, December 3 & 4, 2018, and January 24, 2019. In the January 24 meeting, the Company indicated that it needed to continue to work on system reliability issues and stacked unit retirement cases.

In its January 28, 2019 request for an IRP filing extension, the Company stated: "This extension will enable PacifiCorp to complete its economic analysis of coal units, while appropriately accounting for system reliability and necessary additional portfolio analysis."

The Office believes that a careful and thorough economic analysis of the Company's coal-fired generating units is an important component of the 2019 IRP and that system reliability is a critical aspect of such an analysis. Therefore, the Office supports the Company's request for an extension of the IRP filing deadline.

### **Recommendation**

The Office recommends that the Commission approve the Company's request for an extension of the 2019 IRP filing deadline to no later than August 1, 2019.

CC: Chris Parker, Utah Division of Public Utilities  
Jana Saba, Rocky Mountain Power  
Service List