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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

PacifiCorp's 2019 Integrated Resource Plan	Docket No. 19-035-02 <b>COMMENTS OF WESTERN RESOURCE ADVOCATES</b>
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Pursuant to the Commission's Notice and Request for Comments (January 29, 2019), Western Resource Advocates ("WRA") submits these comments in support of PacifiCorp's request to delay filing the 2019 IRP from April 1 to August 1, 2019. WRA supports this four-month delay in order to allow the Company additional time to complete its economic analysis of coal units and develop a coal retirement strategy that reflects the rapidly changing planning environment and the increasing environmental risks resulting from the continued operation of coal-fired facilities. Thorough coal retirement analysis is a threshold input into PacifiCorp's portfolio development modeling, and WRA understands that additional time is necessary to complete this analysis and the associated reliability assessment. The coal analysis will also inform ongoing MSP discussions and the stayed depreciation case. Given its significance, WRA supports granting additional time in order to facilitate thorough, accurate analysis and, ultimately, the development of a least cost, least risk integrated resource plan. WRA believes that

four months is a reasonable delay and should be sufficient to allow the Company to conduct its modeling.

Dated this 27<sup>th</sup> day of February 2019.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'SH', written over a horizontal line.

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