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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the PacifiCorp's
2019 Integrated Resource Plan

Docket No. 19-035-02

INITIAL COMMENTS OF THE INTERWEST ENERGY ALLIANCE

The Interwest Energy Alliance (“Interwest”) submits these initial comments pursuant to the *Notice and Request for Comments* issued in this docket on January 29, 2019. Interwest supports the extension requested by PacifiCorp for filing of its 2019 Integrated Resource Plan (“IRP”).

PacifiCorp requests an extension to file its 2019 IRP for up to 4 months, so that it is to be filed no later than August 1, 2019.¹ PacifiCorp indicates that it is developing an economic analysis of its coal units that will inform the subsequent portfolio-development phase of the IRP, including an assessment of regional haze compliance alternatives and a broad range of sensitivity studies.²

PacifiCorp has been conducting public meetings at which it presents its modeling results. In December, PacifiCorp presented preliminary studies on its coal unit economic analysis. The analysis showed a significant portion of this fleet to be uneconomic compared to other available resources. PacifiCorp also identified reliability issues which require additional analysis before it can develop a least-cost, least-risk preferred portfolio, as is its practice in accordance with the regulatory requirements of the several commissions which provide regulatory oversight.

¹ Request for Extension filed in this docket on January 28, 2019.

² Ibid.

PacifiCorp indicates it will continue to schedule meetings for stakeholder review and input prior to the filing of the IRP.

Interwest supports the requested extension. The additional time will allow PacifiCorp to complete its coal unit economic analysis and additional reliability analysis. This is a complicated endeavor and Interwest supports taking additional time so that it can be done in as thorough and error-free manner as possible. The extension will likely reduce the time required to allow stakeholders to review, ask questions, and understand the modeling, and will allow PacifiCorp to best understand and propose the action plan steps which logically follow from its revised coal analysis. The initial coal unit modeling results suggest that coal units should be transitioned sooner than anticipated in PacifiCorp's previous resource plans. This early transition will impact other assets, including the transmission system. Therefore, it is appropriate to allow PacifiCorp sufficient time to complete the analysis and prepare a prudent action plan.

Interwest appreciates the opportunity to submit these initial comments. Interwest reserves the right to modify or supplement its position about this application as the docket proceeds.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed and served on the following, by email unless noted otherwise, on this 27th day of February, 2019:

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