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State of Utah
DEPARTMENT OF COMMERCE
Office of Consumer Services

MICHELE BECK
Director

To: Utah Public Service Commission

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

Date: July 25, 2019

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

Background

On July 16, 2019, Rocky Mountain Power (Company) filed with the Public Service Commission of Utah (Commission) a request for another extension of the filing deadline for PacifiCorp's 2019 Integrated Resource Plan (IRP) from August 1, 2019 to no later than October 18, 2019. On July 17, 2019, the Commission issued a Request For Comments in this matter with comments due July 25, 2019. This is the Company's second request for an extension of the filing date for the 2019 IRP. On March 12, 2019, the Commission approved the Company's request to extend the filing date from April 1, 2019 to August 1, 2019.

The Utah Office of Consumer (Office) provides the following comments on the Company's second request to extend the 2019 IRP filing deadline.

OCS Comments

In the Company's July 16, 2019 request for a second filing extension, the Company stated that it had found a modeling error for Jim Bridger coal unit mine reclamation costs. This error affects the comparative analysis of costs and risks of the resource portfolios for at least 50 cases. According to the Company, rerunning these cases with the Jim Bridger modeling error corrected will take at least 4 to 5 weeks, just in model run time.

As stated in our February 27, 2019 comments on the Company's earlier request for a filing extension to August 1, 2019, the Office believes that an accurate economic analysis of the Company's coal-fired generating units is a key component of the 2019 IRP. Accuracy would require rerunning cases with the identified error corrected; and therefore, the Office concludes that the Company's request for a second extension of the IRP filing deadline is necessary.

Recommendations

The Office recommends that the Commission approve the Company's request for an extension of the 2019 IRP filing deadline to no later than October 18, 2019.

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