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November 13, 2019

VIA ELECTRONIC FILING

Public Service Commission of Utah
Heber M. Wells Building, Fourth Floor
160 East 300 South
Salt Lake City, Utah 84114

Attn: Gary Widerburg
Commission Administrator

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

Dear Mr. Widerburg:

The Public Service Commission of Utah (“Commission”) has established a March 31 filing date for PacifiCorp to file biennial Integrated Resource Plans, (“IRPs”).¹ On July 29, 2019, the Commission authorized PacifiCorp’s postponement of the filing of the 2019 IRP until October 18, 2019. PacifiCorp has committed to file its IRP Updates within one year of filing its IRP.² For a number of reasons, PacifiCorp respectfully provides notice that it does not plan to file a 2019 IRP Update so that it can focus its efforts on the acknowledgement and acceptance of the 2019 IRP and the preparation for the 2021 IRP.

PacifiCorp does not anticipate receiving acknowledgement orders of the 2019 IRP from all of its state commissions before March 31, 2020, when it would typically file the 2019 IRP Update. PacifiCorp will therefore be unable to incorporate requests by state commissions to include or provide requested information or in its IRP Update. Also, beginning around June 2020, PacifiCorp will be preparing for the 2021 IRP with pre-IRP studies, processes, and preparations for the public-input process in order to file the 2021 IRP at the end of March 2021.

In addition, PacifiCorp plans to evaluate and, if possible, implement new and improved modeling software. During the 2019 IRP cycle, PacifiCorp experienced delays due to performance issues with its existing modeling software, despite also improving and expanding upon its modeling capabilities. The continuous IRP modeling cycle makes it very difficult to conduct an evaluation

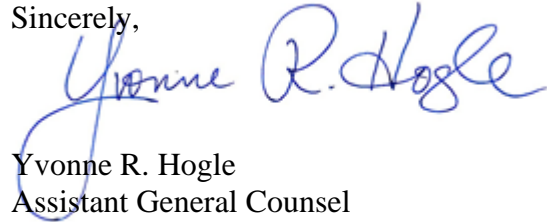
¹ See, *In the Matter of the Acknowledgement of PacifiCorp's Integrated Resource Plan*, Report and Order at 57, issued April 1, 2010, Docket No. 09-2035-01

² *In the Matter of the PacifiCorp Integrated Resource Plan 2004*, Report and Order at 13, issued July 21, 2005, Docket No. 05-2035-01.

and implementation of software updates. Not filing the 2019 IRP Update will provide PacifiCorp a small window to pursue this much needed effort.

Please feel free to direct any inquiries regarding this matter to Shay LaBray, Director Resource Planning, at (503) 813-6176 or to Jana Saba, Utah Regulatory Affairs Manager at (801) 220-2823.

Sincerely,



Yvonne R. Hogle
Assistant General Counsel

cc: Service List

CERTIFICATE OF SERVICE

Docket No. 19-035-02

I hereby certify that on November 13, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

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