

January 5, 2021

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administrator

RE: **Docket No. 19-035-42 - In the Matter of the Application of Rocky Mountain Power for Approval of the 2020 Inter-Jurisdictional Allocation Protocol**
Notice

On December 3, 2019, Rocky Mountain Power (“Company”), a division of PacifiCorp, applied to the Public Service Commission of Utah (“Commission”) for approval of the 2020 PacifiCorp Inter-Jurisdictional Allocation Protocol (“2020 Protocol”). On April 15, 2020, the Commission issued its order approving the 2020 Protocol as filed.

Section 4 – Implemented Issues, of the 2020 Protocol, summarizes issues to be implemented during the Interim Period. Section 4.1 - States’ Decision to Exit Interim Period Resources and Section 4.2 - Reassignment of Coal-Fueled Interim Period Resources outline the timeline and process that will be followed for states to exit a resource and the possible reassignment of that resource to other states. Specifically, Section 4.2.2 provides that:

- 1) PacifiCorp was to target filing, on or before February 1, 2021, state-specific recommendations to commissions for coal-fueled resources that have a commission-approved Exit Date that would discontinue a state’s allocation of costs and benefits on or before December 31, 2027. The filings would include the Company's analysis and recommendations for potential reassignment of allocations for those resources.
- 2) To the extent a delay to these filings was necessary, the Company would provide notice to the parties and commissions explaining the reason and expected filing dates.

On December 9, 2020, the Company met with the Utah parties in this docket to discuss a one-year delay in filing the analysis and state-specific recommendations for resources with Exit Dates earlier than December 31, 2027. Additionally, the Company also met with Idaho and Wyoming parties and all signatories to the 2020 Protocol. The Company proposed a delay for the following reasons: 1) the signatories to the 2020 Protocol continue to work towards resolution of the long-term planning and new resource assignment framework issue; 2) while the Public Utility of Oregon approved some exit dates it noted that it will continue to evaluate the

economics of PacifiCorp's coal fleet;¹ 3) the Company is in the middle of updating its modeling tools to better reflect the future allocation methodology envisioned in the 2020 Protocol; and 4) the Company will file its 2021 Integrated Resource Plan (IRP) in April 2021 and the delay will allow for consistent assumptions in both the IRP and the reassignment analysis.

No party opposed the decision to delay this filing. Accordingly, Company is respectfully providing this letter as notice to the Commission that the Company now anticipates a new target filing date of February 1, 2022, to fulfill the commitments in Section 4.2 of the 2020 Protocol.

Informal inquiries may be directed to Jana Saba, Utah Regulatory Manager, at (801) 220-2823.

Sincerely,



Joelle Steward
Vice President, Regulation

cc: Service List

¹ *In the matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision*, Order No. 20-473 at (Dec. 18, 2020) (“We adopt exit orders for Cholla Unit 4, Jim Bridger Unit 1, Craig Units 1-2, Naughton Units 1-2; Colstrip Units 3-4; and Dave Johnston Units 1-4 with the exit dates proposed by PacifiCorp.... While the 2020 Protocol does not require exit orders for Cholla Unit 4, Craig Units 1-2, and Colstrip Units 3-4, which are not operated by PacifiCorp, we adopt exit orders for these units to provide other states with notice of Oregon’s anticipated exit based on the information currently available, but emphasize that we will continue to evaluate the economics of these units.... We decline to issue exit orders for Jim Bridger Units 2-4 in this proceeding. The December 31, 2025 exit dates are earlier than the 2019 IRP, and are not supported by evidence in this case.”).

CERTIFICATE OF SERVICE

Docket No. 19-035-42

I hereby certify that on January 5, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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