

February 18, 2022

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. On December 18, 2020, the Public Utility Commission of Oregon issued exit orders for certain coal-fueled resources.¹

Section 4.1 (States’ Decision to Exit Interim Period Resources) and Section 4.2 (Reassignment of Coal-Fueled Interim Period Resources) of the 2021 Protocol, 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.

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.”).

On January 5, 2021, PacifiCorp filed notice that it would be delaying the filing under Section 4.2.2 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 Commission of Oregon approved some exit dates it noted that it will continue to evaluate the economics of PacifiCorp's coal fleet; 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 2021 and the delay will allow for consistent assumptions in both the IRP and the reassignment analysis.

On September 1, 2021, PacifiCorp filed its 2021 IRP, which indicated a common closure for the coal-fueled resources with exit orders prior to December 31, 2027.² Consistent with Section 4.2.3 of the 2020 Protocol, if a regulatory proceeding results in the common closure dates of a coal-fueled resource then the process for common closure under section 4.1.1 will apply. As a result, reassignment proceedings for those resources are no longer necessary.

Accordingly, the Company is respectfully providing this letter as notice to the Commission that the Company does not anticipate filing reassignment cases as previously described in the January 5, 2021 letter.

Informal inquiries may be directed to Steve McDougal, Managing Director Revenue Requirement, at (801) 220-4743.

Sincerely,



Joelle Steward,
Senior Vice President, Regulation and Customer/Community Solutions

² *PacifiCorp's 2021 Integrated Resource Plan*, Docket No. 21-035-09, 2021 Integrated Resource Plan, Volume I at 15 (Sept. 1, 2021).

CERTIFICATE OF SERVICE

Docket No. 19-035-42

I hereby certify that on February 18, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

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