



SPENCER J. COX  
Governor

DEIDRE M. HENDERSON  
Lieutenant Governor

State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: The Public Service Commission of Utah  
From: The Office of Consumer Services  
Michele Beck, Director  
Béla Vastag, Utility Analyst  
Date: March 3, 2021  
Subject: Docket 21-035-09  
**In the Matter of:** PacifiCorp's 2021 Integrated Resource Plan

## INTRODUCTION

On February 12, 2021, Rocky Mountain Power (RMP) filed a request with the Utah Public Service Commission (PSC) to change the filing deadline for PacifiCorp's 2021 Integrated Resource Plan (IRP) from April 1, 2021 to "no later than September 1, 2021". On February 16, 2021, the PSC issued a Notice and Request for Comments that set a deadline of March 3, 2021 for parties to file initial comments and March 10, 2021 for reply comments on RMP's request for a filing extension of the 2021 IRP.

According to the schedule set by the PSC, the Utah Office of Consumer Services (OCS) submits these comments on RMP's request for an IRP filing extension.

## BACKGROUND

In its February 12, 2021 memo to the PSC, RMP states that it is requesting an IRP filing extension for two reasons:

1. PacifiCorp wants to ensure that the 2021 IRP can incorporate results from PacifiCorp's currently ongoing 2020 All-Source RFP process. The final shortlist of resources resulting from the 2020 RFP is expected to be completed by June 1, 2021. Delaying the 2021 IRP until September 1, 2021 allows PacifiCorp to "align" the IRP with the results of the 2020 RFP.

2. PacifiCorp needs additional time to fully implement and optimize its new IRP modeling software. In 2020, PacifiCorp started using new modeling software – the Plexos model. In IRP public input meetings, PacifiCorp has indicated that it was having challenges with Plexos model functionality and performance. Because of these ongoing challenges, the company stated in its last public input meeting, on February 10, 2021, that it had not yet been able to successfully complete any model runs to determine potential final resource portfolios. Delaying the 2021 IRP will allow time for Plexos model optimization and also for stakeholders to have adequate time to review the modeling results and provide feedback before the final 2021 IRP is filed.

## **OFFICE OF CONSUMER SERVICES COMMENTS**

Considering the two issues discussed above, the OCS believes that in this instance, it is more important to allow PacifiCorp time to continue to work toward a more effectual 2021 IRP, including a process that also allows time for extensive stakeholder feedback, than to meet the current April 1, 2021 filing deadline. First, filing an IRP that is not informed by the results of the 2020 RFP risks making the 2021 IRP out-of-date soon after it is filed. Second, the current modeling delays may not allow time for stakeholders to review results, provide input and ask for additional analyses before a final IRP document is filed on April 1. Stakeholders have often criticized PacifiCorp in the past for last minute modeling results that are included in the final IRP, without first presenting the results in public input meetings and allowing time for stakeholders to meaningfully respond. Therefore, the OCS supports RMP's request for a filing extension.

## **RECOMMENDATION**

The OCS recommends that the PSC approve RMP's request to change the filing deadline for PacifiCorp's 2021 IRP to September 1, 2021.

cc:

Joelle Steward, Rocky Mountain Power  
Chris Parker, Division of Public Utilities  
Email Service List