

Phillip J. Russell (10445)
JAMES DODGE RUSSELL & STEPHENS PC
10 West Broadway, Suite 400
Salt Lake City, Utah 84101
Telephone: (801) 363-6363
Email: prussell@jdrsllaw.com

Counsel for Utah Association of Energy Users

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

PacifiCorp's 2021 Integrated Resource Plan	Docket No. 21-035-09
--	----------------------

COMMENTS OF THE UTAH ASSOCIATION OF ENERGY USERS

The Utah Association of Energy Users ("UAE") hereby submits these comments in response to PacifiCorp's February 12, 2021 request ("Request") for an extension to file its 2021 Integrated Resource Plan ("IRP").

UAE does not oppose PacifiCorp's Request to postpone the filing of its 2021 IRP to no later than September 1, 2021. While UAE is concerned about the delay in submitting the 2021 IRP, for the reasons discussed in PacifiCorp's application in this docket a timely IRP filing would be of limited use and would not allow the amount of feedback on proposed resource portfolios as is typical in an IRP process.

As PacifiCorp notes in its Application that it is experiencing performance issues in utilizing its new IRP model, PLEXOS. PacifiCorp indicates that it has not successfully completed any model runs to establish resource portfolios to evaluate costs and risks. Because no resource portfolios have yet been established, UAE and other stakeholders have not had an opportunity to provide feedback on any resource portfolios. UAE does not oppose the delay sufficient to allow

appropriate stakeholder feedback in developing the final resource portfolio that will be presented in the 2021 IRP.

PacifiCorp notes that the delay will allow it to include the projects listed in the final shortlist of the 2020 All-Source Request for Proposals (“2020AS RFP”) into the 2021 IRP. UAE agrees that the resource portfolios developed in the 2021 IRP would benefit from the inclusion of the 2020AS RFP final shortlist. UAE is concerned, however, that the assumptions underlying resource portfolio costs for all resources not identified in the 2020AS RFP final shortlist will suffer as a result of the proposed delay. On balance, however, UAE believes that it is appropriate to grant the requested delay.

DATED: March 3, 2021.

Respectfully submitted,



By:

Phillip J. Russell
JAMES DODGE RUSSELL & STEPHENS P.C.

Counsel for UAE

Certificate of Service
Docket No. 21-035-09

I hereby certify that a true and correct copy of the foregoing was served by email on March 3, 2021 on the following:

ROCKY MOUNTAIN POWER

Jana Saba jana.saba@pacificorp.com
 Datarequest@pacificorp.com
 utahdockets@pacificorp.com

DIVISION OF PUBLIC UTILITIES

William Powell wpowell@utah.gov
Patricia Schmid pschmid@agutah.gov
Justin Jetter jjetter@agutah.gov
 dpudatarequest@utah.gov

OFFICE OF CONSUMER SERVICES

Michele Beck mbeck@utah.gov
Robert Moore rmoore@agutah.gov
 ocs@utah.gov

/s/ Phillip J. Russell