
PacifiCorp's 2021 Integrated Resource Plan

DOCKET NO. 21-035-09

ORDER GRANTING REQUEST FOR
EXTENSION TO FILE

ISSUED: March 15, 2021

Background

On February 12, 2021, PacifiCorp filed a request (“Request”) with the Public Service Commission (PSC) for an extension to file its 2021 Integrated Resource Plan (IRP). The PSC previously established March 31, 2021 as the 2021 IRP filing deadline. In its Request, PacifiCorp asks that the 2021 IRP filing deadline be extended to September 1, 2021. PacifiCorp explains that its 2020 All-Source Request for Proposals (“2020AS RFP”) is on schedule to reach a final shortlist by June 1, 2021. PacifiCorp asserts it is reasonable to extend the filing date to allow the planning cycle to account for the results of the 2020AS RFP. PacifiCorp also represents it has been working since the summer of 2020 to implement new modeling software for the 2021 IRP. PacifiCorp asserts the extension will “enable [it] to optimize the modeling functionality of [the] new system and complete the necessary analysis to develop a least-cost, least-risk preferred portfolio.”

On February 16, 2021, the PSC issued a Notice and Request for Comments regarding the Request. Subsequently, the Office of Consumer Services (OCS), the Division of Public Utilities (DPU), the Utah Association of Energy Users (UAE), and Sierra Club filed comments. PacifiCorp and UAE later filed reply comments.

The OCS supports RMP's request for an extension. The OCS argues “modeling delays may not allow time for stakeholders to review results, provide input and ask for additional

analyses before” the 2021 IRP is finalized. 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 ... allows time for extensive stakeholder feedback, than to meet the current April 1, 2021 filing deadline.”

UAE similarly does not oppose the request for an extension to September 1, 2021, reasoning that 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.” UAE opposes any additional extension beyond September 1, 2021.¹

Sierra Club maintains that “[a] reasonable delay in the [2021] IRP filing may be justified,” but argues against extending the deadline by five months. Sierra Club proposes an extension to July 15, 2021 would be more appropriate. Sierra Club also advocates that the PSC should add additional modeling and informational requirements to the IRP filing.

The DPU is the only party to submit comments wholly opposed to an extension. It argues, among other things, that PacifiCorp’s 2019 IRP filing was twice delayed and the delays resulted in PacifiCorp failing to file a 2019 IRP Update because it would have been due “mere months after the 2019 IRP itself.” The DPU emphasizes the importance of an established filing date and asserts PacifiCorp has offered inadequate justification for an extension.

¹ In reply comments, UAE emphasized that incorporating the results of the 2020AS RFP was not, in UAE’s view, a sufficient basis to delay the IRP filing. However, UAE continued to support the extension because “PacifiCorp will not be able to submit an IRP on March 31 that complies with the Standards and Guidelines or that fully incorporates public input and, as such, a delay is merited.”

In response to these parties' comments, PacifiCorp expresses its appreciation for Sierra Club's support of an extension but urges that an extension until July 15, 2021 would be inadequate to "work through modeling and incorporate the 2020AS RFP final shortlist while allowing for sufficient stakeholder consideration and feedback." PacifiCorp further argues that imposing additional modeling requirements "would only result in more time constraints and further delay."

Regarding the DPU's opposition, PacifiCorp acknowledges the desirability of a predictably timed IRP but argues its request for an extension "is based on factors that are unique and materially impact the ability of [PacifiCorp] to produce an IRP consistent with the guidelines." PacifiCorp represents it simply "cannot meet the March 31 filing date with a document that will fulfill the [PSC's] guidelines or provide meaningful results."

Discussion, Findings, and Conclusions

The PSC acknowledges and shares concerns raised by the DPU and other parties regarding a consistent, dependable filing deadline for PacifiCorp's IRP. However, the PSC also recognizes that the most fundamental objective of this process is to obtain an accurate, complete, and useful IRP that is informed by a process of appropriate and thorough stakeholder input. Here, all parties but the DPU appear to acknowledge that a delay is simply necessary to achieve that objective. Having reviewed the Request, comments, and reply comments, the PSC therefore finds that granting the Request is just, reasonable, and in the public interest. PacifiCorp shall file its 2021 IRP no later than September 1, 2021.

Nevertheless, the PSC shares the DPU's concern that the extension not affect subsequent filing deadlines, specifically PacifiCorp's 2021 IRP Update. Therefore, though the PSC grants

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the Request, the PSC advises PacifiCorp that it should be prepared to timely file its 2021 IRP Update notwithstanding the extension to the filing deadline for its 2021 IRP.

DATED at Salt Lake City, Utah, March 15, 2021.

/s/ Michael J. Hammer
Presiding Officer

Attest:

/s/ Gary L. Widerburg
PSC Secretary
DW#317742

CERTIFICATE OF SERVICE

I CERTIFY that on March 15, 2021, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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