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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2021 Integrated
Resource Plan

Docket No. 21-035-09

Pursuant to the Scheduling Order issued September 20, 2021, by the Public Service Commission of Utah, Sierra Club hereby submits the following questions for discussion at the January 19, 2022 technical conference:

1. PacifiCorp has explained that it was required to make certain pre- and post-modeling adjustments to account for reliability shortfalls identified between the LT and ST model runs.
 - a. Please explain what reliability analyses were conducted for the P-02 variant cases, including P-02h (early Jim Bridger retirement), and the reliability shortfalls that were identified—including the size, duration, and time of year—that required pre- or post-modeling adjustments;
 - b. Please provide a detailed explanation of which specific resources were considered to meet the reliability gaps and why, including whether any resources were initially considered but ultimately not included for possible selection;
 - c. Of the four resource types that PacifiCorp used as portfolio refinements (solar + storage; storage; nuclear; non-emitting peaker), please identify the specific resources that were added in any of the P02 and P03 variant portfolios, by year, MW, and type;
 - d. Please provide a detailed explanation for why PacifiCorp did not re-optimize its model runs after making reliability adjustments.
2. PacifiCorp has noted that the 13 percent reserve margin it applied for individual load areas is consistent with Western Electricity Coordinating Council (WECC) and Northwest Power Pool reserve margins. Please explain why it is appropriate to apply a 13 percent reserve margin to PacifiCorp's individual load areas, which are much smaller geographic areas than those considered by WECC or the Northwest Power Pool.

- a. Please explain how many individual load areas are in each control area.
3. Please explain why minimum take assumptions were necessary for the Jim Bridger coal plant through the anticipated life of the plant if the modeling also included an assumption that when the plant retired, it no longer incurred any take or pay costs.
4. PacifiCorp has indicated that it is not making any assumptions regarding Idaho Power's continued participation in the Jim Bridger power plant. Idaho Power's 2021 IRP indicates that it will exit Unit 3 by 2025, Unit 4 by 2028, and the gas-converted Units 1 and 2 by 2034. Please explain how Idaho Power's exit from the Jim Bridger plant could impact the viability of assumed continued operations of the plant in the Company's preferred portfolio.
5. Please explain whether the Company has evaluated whether the P02h variant case is inherently CETA compliant. If not, please explain why not.

If you would like to discuss these questions in advance of the technical conference, please contact me at the contact information above.

Dated: 5 January 2022

Respectfully submitted,

/s/
Rose Monahan
Sierra Club Environmental Law Program