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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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

UAE Questions for January 19, 2022 Technical Conference

UAE submits the following questions for the January 19, 2022 technical conference:

1. **Natrium-Naughton-Transmission**

The IRP indicates that the Natrium nuclear plant will be placed in service by the summer of 2028. Natrium will be located at or near the site of the existing Naughton plant. Natrium is proposed to be a 345 MW baseload unit that, when combined with its storage capability, has a maximum output of 500 MW for a period of 5.5 hours.

Naughton 1 & 2 are scheduled to be retired by the end of 2025. Naughton 3 (gas conversion) is scheduled to be retired by the end of 2029.

Naughton 1 and 2 have a combined nameplate capacity of 357 MW (Naughton 1 = 156 MW; Naughton 2 = 201 MW). Naughton 3 has a nameplate capacity of 247 MW.

In Table 1.1 on page 10 of the IRP, PacifiCorp asserts that it will use "reclaimed transmission upon retirement of Naughton 1 & 2" for the 500 MW Natrium project. As of summer of 2028 when Natrium is intended to come online, however, the reclaimed transmission rights for Naughton 1 & 2 will not be sufficient to deploy the 500 MW maximum output for Natrium. Will there be sufficient transmission rights to interconnect Natrium as a 500 MW project as of the summer of 2028, or will it require provisional interconnection service until Naughton 3 is retired in 2029?

2. Storage Resources – Transmission modeling

Page 11 of the IRP states: "Through 2040, the 2021 IRP includes 4,781 MW of storage co-located with solar resources, 1,400 MW of standalone battery, and 500 MW of pumped hydro." For transmission modeling purposes, are storage resources modeled like other generation resources? For instance, when a new generation resource proposes to interconnect to the PacifiCorp system, PacifiCorp models that generation resource as though it will produce at nameplate capacity at the same time that all other existing resources (and prior queued resources) are also producing at nameplate capacity. Does PacifiCorp make this same modeling assumption for storage resources?

If that is the case, does this modeling requirement constrain the deployment of storage resources that might otherwise make more efficient use of transmission resources?

What, if anything, can be done to change how resources are modeled to allow for greater deployment of storage resources in a way that does not—for modeling purposes—create additional transmission constraints but, rather, makes more efficient use of those transmission resources?

Respectfully submitted,

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