

July 29, 2022

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Secretary

RE: Docket No. 21-035-09
PacifiCorp's 2021 Integrated Resource Plan Update
PacifiCorp's Reply Comments

PacifiCorp hereby submits its Reply Comments in accordance with the Notice of Filing and Comment Period issued by the Public Service Commission of Utah ("Commission") on April 6, 2022 in the above referenced matter.

Informal inquiries may be directed to Jana Saba, Utah Regulatory Affairs Manager, at (801) 220-2823.

Sincerely,



Joelle Steward
Senior Vice President, Regulation and Customer/Community Solutions

Enclosures

Cc: Service List

Emily L. Wegener (12275)
Rocky Mountain Power
1407 W. North Temple, Suite 320
Salt Lake City, UT 84116
Telephone No.: (801) 220-4526
Facsimile No.: (801) 220-3299
Email: emily.wegener@pacificorp.com

Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

**IN THE MATTER OF PACIFICORP'S
2021 INTEGRATED RESOURCE PLAN**

DOCKET NO. 21-035-09

PACIFICORP'S REPLY COMMENTS

In accordance with the Utah Public Service Commission's ("Commission") Notice of Filing and Comment Period, PacifiCorp dba Rocky Mountain Power ("PacifiCorp" or the "Company"), by and through its counsel, provides these Reply Comments to the comments received by the Commission from the Division of Public Utilities ("DPU") on June 29, 2022.

INTRODUCTION

PacifiCorp filed an update to its 2021 Integrated Resource Plan ("IRP") on March 31, 2022 ("2021 IRP Update"). The 2021 IRP Update provides additional updates including a description of resource planning, procurement activities, an updated load and resource balance, an updated resource portfolio reflecting updates to load forecast and other model inputs, and a status update on action plan items from the 2021 IRP. On June 29, 2022, the DPU provided comments on the 2021 IRP Update ("DPU Comments") and submitted a recommendation that the Commission take no further action. The DPU's Comments expressed concern about some aspects of the 2021 IRP Update to which the Company responds in these reply comments.

REPLY TO DPU’S COMMENTS

Gas, Carbon, and Market Prices Update

The DPU noted that the Company did not update its portfolio pricing for wholesale power prices, natural gas prices or carbon prices. Comments at 2. The Company is actively working on updated carbon prices for price-policy scenarios in its 2023 IRP analysis, including an update of the Social Cost of Greenhouse Gas assumption. Updated assumptions will be discussed as part of the 2023 IRP public input meeting series.

2021 IRP Update Resources.

The DPU requests that the Company align the capacity categories between the IRP and IRP update. Comments at 7. The 2021 IRP represents the first time the Company produced this type of reporting since adopting Plexos. The data gathering and reporting evolved between the 2021 IRP and the 2021 IRP update as the Company refined its use of Plexos tools, allowing for additional categories. The necessary data breakout was not produced in the 2021 IRP. Going forward, the Company intends to use the expanded categories modeled in the 2021 IRP Update.

2020 All Source Request for Proposals

The DPU expresses concern that some of the resources selected in the 2020 All Source Request for Proposals (“2020AS RFP”) have dropped out of the contracting process and that contract negotiations on the remaining resources appear to be moving slowly. Accordingly, the DPU requests that the Company clarify the 2020AS RFP capacity with the timeline of what projects have dropped out of, or have been added to, the final short list and provide an update about the expected execution dates and contingency plans for filling resource needs in the event the 2020AS RFP projects do not reach execution.

At this time, only two resources have formally withdrawn from the 2020AS RFP final shortlist. PacifiCorp will continue to provide notice upon contract execution and anticipates a number of resources where contract execution is likely in the near term. PacifiCorp will provide notice to the remaining final shortlist participants that contract negotiations will end if final terms have not been reached by approximately November 1, 2022, as a result of activities specific to the 2022AS RFP.

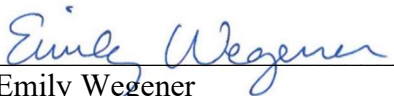
Modeling of New Gas Resources.

The DPU disagrees with the Company's decision not to model new natural gas resources in the 2021 IRP. In light of additional feedback from the DPU, the Company intends to model new natural gas resources in the 2023 IRP. The 2023 IRP must also consider alternative fuels discussed at the Company's June 10, 2020 public input meeting. The Company notes that hydrogen ready new gas resources might be easily converted to green hydrogen generation as markets for that fuel mature. The Company will continue to receive and assess feedback on this issue as it develops the 2023 IRP.

CONCLUSION

PacifiCorp agrees with the DPU that no further action is required by the Commission relating to the 2021 IRP Update. PacifiCorp appreciates the comments received from the DPU regarding its 2021 IRP Update and will continue to actively support stakeholder participation and address parties' requests and recommendations where possible.

Respectfully submitted this 29th day of July, 2022.


Emily Wegener

Attorney for Rocky Mountain Power

CERTIFICATE OF SERVICE

Docket No. 21-035-09

I hereby certify that on July 29, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck	mbeck@utah.gov
Alyson Anderson	Akanderson@utah.gov
Bela Vastag	bvastag@utah.gov
Alex Ware	aware@utah.gov
ocs@utah.gov	

Division of Public Utilities

Madison Galt	madison.galt@utah.gov
dpudatarequest@utah.gov	

Assistant Attorney General

Patricia Schmid	pschmid@agutah.gov
Robert Moore	rmoore@agutah.gov

Western Resource Advocates

Sophie Hayes (C)	Sophie.hayes@westernresources.org
Nancy Kelly (C)	nkelly@westernresources.org
Steven S. Michel (C)	smichel@westernresources.org

Interwest Energy Alliance

Lisa Tormoen Hickey (C)	lisahickey@newLawgroup.com
Chris Leger	chris@interwest.org

Fervo Energy Company

Sarah Jewett	sarah@fervoenergy.com
Dawn Owens	dawn@fervoenergy.com

Utah Clean Energy

Hunter Holman (C)	hunter@utahcleanenergy.org
Kate Bowman (C)	kate@utahcleanenergy.org

Utah Association of Energy Users

Phillip J. Russell (C)	prussell@jdrslaw.com
Don Hendrickson (C)	dhendrickson@energystrat.com

Sierra Club

Rose Monahan

rose.monahan@sierraclub.org

Ana Boyd

ana.boyd@sierraclub.org

Southwest Energy Efficiency Project

Justin Brant

jbrant@swenergy.org

Salt Lake City Corporation

Sara Montoya

sara.montoya@slcgov.com

Christopher Thomas

christopher.thomas@slcgov.com

Rocky Mountain Power

Data Request Response Center

datarequest@pacificorp.com

Jana Saba

jana.saba@pacificorp.com

utahdockets@pacificorp.com

Emily Wegener

emily.wegener@pacificorp.com

A handwritten signature in black ink, reading "Jennifer Angell", written over a horizontal line.

Jennifer Angell
Regulatory Project Manager, Regulatory
Affairs