

December 8, 2022

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Secretary

RE: **Docket No. 21-035-52 – Application of Rocky Mountain Power for Approval of a Solicitation Process for 2022 All Source Request for Proposals**  
Rocky Mountain Power’s Compliance Filing

On September 22, 2022, the Public Service Commission of Utah (“Commission”) issued an Order in the above referenced matter approving the request of PacifiCorp d. b. a. Rocky Mountain Power (“the Company”) to update the benchmark resources listed in Appendix O to the 2022 All Source Request for Proposals (“2022AS RFP”). In the Order, the Commission required the company to file any subtractions from Appendix O for posting to the above referenced docket.

In accordance with the requirements of the Order, the Company hereby submits Attachment 1, which is an updated Appendix O that has been redlined to show the resources that have been removed since the most recent version of Appendix O that was filed by the Company on August 12, 2022. The Company notes that resources have been removed and no resources were added.

Informal inquiries on this matter may be directed to Jana Saba at (801) 220-2823.

Sincerely,



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

Enclosures

CC: Docket No. 21-035-52

**CERTIFICATE OF SERVICE**

Docket No. 21-035-52

I hereby certify that on December 8, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Alyson Anderson [akanderson@utah.gov](mailto:akanderson@utah.gov)  
Bela Vastag [bvastag@utah.gov](mailto:bvastag@utah.gov)  
Alex Ware [aware@utah.gov](mailto:aware@utah.gov)  
[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

Madison Galt [mgalt@utah.gov](mailto:mgalt@utah.gov)  
[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
Robert Moore [rmoore@agutah.gov](mailto:rmoore@agutah.gov)

**Interwest Energy Alliance**

Lisa Tormoen Hickey [lisahickey@newLawgroup.com](mailto:lisahickey@newlawgroup.com)  
Nate Blouin [nate@interwest.org](mailto:nate@interwest.org)

**Utah Association of Energy Users**

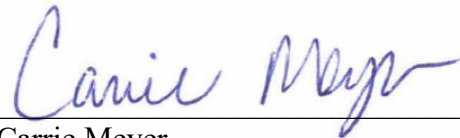
Phillip J. Russell [prussell@jdrslaw.com](mailto:prussell@jdrslaw.com)  
Kevin C. Higgins [khiggins@energystrat.com](mailto:khiggins@energystrat.com)

**Western Resource Advocates**

Sophie Hayes [sophie.hayes@westernresources.org](mailto:sophie.hayes@westernresources.org)  
Nancy Kelly [nkelly@westernresources.org](mailto:nkelly@westernresources.org)  
Callie Hood [callie.hood@westernresources.org](mailto:callie.hood@westernresources.org)

**Rocky Mountain Power**

Data Request Response Center [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
Jana Saba [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)  
Carla Scarsella [carla.scarsella@pacificorp.com](mailto:carla.scarsella@pacificorp.com)  
Joseph Dallas [joseph.dallas@pacificorp.com](mailto:joseph.dallas@pacificorp.com)



Carrie Meyer  
Adviser, Regulatory Operations

## APPENDIX O

### PacifiCorp’s Company Alternative (Benchmark Resources)

#### Proposed 2022AS RFP Company Benchmark Resources

- PacifiCorp intends to submit ~~up to thirty seven (37)~~twelve (12) individual Benchmark Resources. Benchmark Resources will be comprised of Market Options and Owned Options. For each of the Market Options, PacifiCorp will have a purchase option to purchase the entire project outright. Market Option resources will not be eligible to be bid into the RFP separately as either PPA or BTA bids.
- These will be new greenfield resources that will be constructed across PacifiCorp’s transmission system.
- To be built on property either currently owned or leased by PacifiCorp, or on property that PacifiCorp will acquire rights to develop.
- Prospective Benchmark Resource sizes and tie-in locations as shown below:

| Size (MW)        | Technology         | Benchmark Option Type | Location (POI)                                   | Interconnection Status  | Expected Life | Expected Efficiency | State         |
|------------------|--------------------|-----------------------|--|---|---------------|---------------------|---------------|
| 199.9            | Storage            | Owned                 | Clover Substation                                | Under study in PacifiCorp’s 2022 Interconnection Cluster            | 20            | 89-92%              | UT            |
| 200              | Storage            | Market                | Mercer Substation                                | Under study in PacifiCorp’s 2022 Interconnection Cluster            | 20            | 85-90%              | UT            |
| 200              | Solar              | Market                | Mercer Substation                                | Under study in PacifiCorp’s 2021 Interconnection Cluster            | 25            | 27-31%              | UT            |
| 30               | Solar              | Owned                 | Gunnison-Sigurd #1 Tap                           | LGIA Signed   | 25            | 27-31%              | UT            |
| 99               | Solar              | Owned                 | Horseshoe <del>Jensen 138kV Tap</del> Substation | Under study in PacifiCorp’s 2022 Interconnection Cluster            | 25            | 27-31%              | UT            |
| <del>80</del>    | <del>Solar</del>   | <del>Owned</del>      | <del>Bar Nunn Substation</del>                   | <del>LGIA Signed</del>  | <del>25</del> | <del>26-30%</del>   | <del>WY</del> |
| <del>100</del>   | <del>Wind</del>    | <del>Market</del>     | <del>Evanston-Anschutz Tap</del>                 | <del>LGIA Signed</del>  | <del>30</del> | <del>31-34%</del>   | <del>UT</del> |
| 101.2            | Solar              | Owned                 | Windstar Substation                              | Under study in PacifiCorp’s 2022 Interconnection Cluster            | 25            | 19-23%              | WY            |
| <del>160</del>   | <del>Solar</del>   | <del>Owned</del>      | <del>Casper Substation</del>                     | <del>LGIA Signed</del>  | <del>25</del> | <del>26-29%</del>   | <del>WY</del> |
| 178              | Solar              | Owned                 | Emery Substation                                 | LGIA Signed   | 25            | 27-31%              | UT            |
| <del>199.9</del> | <del>Storage</del> | <del>Owned</del>      | <del>Aeolus Substation</del>                     | <del>Under study in PacifiCorp’s 2022 Interconnection Cluster</del> | <del>20</del> | <del>88-92%</del>   | <del>WY</del> |
| <del>199.9</del> | <del>Storage</del> | <del>Owned</del>      | <del>Anticline Substation</del>                  | <del>Under study in PacifiCorp’s 2022 Interconnection Cluster</del> | <del>20</del> | <del>88-92%</del>   | <del>WY</del> |

|         |                |        |  |  |    |        |     |
|---------|----------------|--------|--|--|----|--------|-----|
| 199.9   | Storage        | Owned  | Mona Substation                        | Under study in PacifiCorp's 2022 Interconnection Cluster | 20 | 88-92% | UT  |
| 199.9   | Storage        | Owned  | Snow Goose Substation                  | Under study in PacifiCorp's 2022 Interconnection Cluster | 20 | 88-92% | OR  |
| 48.4    | Solar          | Owned  | Shirley Basin Substation               | Under study in PacifiCorp's 2022 Interconnection Cluster | 25 | 20-24% | WY  |
| 48.4    | Solar          | Owned  | Dunlap Substation                      | Under study in PacifiCorp's 2022 Interconnection Cluster | 25 | 17-21% | N/A |
| 393     | Pumped Storage | Market | Malin Substation                       | LGIA Signed  | 50 | 70-80% | OR  |
| 400     | Pumped Storage | Market | New Loco Mountain Substation           | LGIA Signed  | 50 | 70-80% | MT  |
| 500     | Pumped Storage | Market | Rocky Reach Columbia line (BPA or PSE) | BPA Interconnection Study in process                     | 50 | 70-80% | WA  |
| 500     | Pumped Storage | Market | Oquirrh Substation                     | Under study in PacifiCorp's 2022 Interconnection Cluster | 50 | 70-80% | UT  |
| 199     | Wind           | Market | Union Gap—Midway 230kV tap             | Under study in PacifiCorp's 2022 Interconnection Cluster | 30 | 28-33% | WA  |
| 150-300 | Wind           | Market | New Loco Mountain Substation           | Interconnection request currently being studied          | 30 | 33-38% | MT  |
| 87      | Solar          | Market | Mathington Substation                  | LGIA Signed  | 25 | 27-31% | UT  |
| 456     | Wind           | Market | Red Butte—Sigurd #2 345kV tap          | Under study in PacifiCorp's 2022 Interconnection Cluster | 30 | 27-32% | UT  |
| 153     | Wind           | Market | Bonneville-Goshen 161kV                | Under study in PacifiCorp's 2022 Interconnection Cluster | 30 | 31-36% | ID  |
| 206     | Wind           | Market | Goshen-Antelope 161kV                  | Under study in PacifiCorp's 2022 Interconnection Cluster | 30 | 31-36% | ID  |
| 194     | Solar          | Owned  | Dunlap Substation                      | Under study in PacifiCorp's 2022 Interconnection Cluster | 25 | 15-19% | WY  |
| 96.8    | Solar          | Owned  | Bowler Flats Substation                | Under study in PacifiCorp's 2022 Interconnection Cluster | 25 | 22-26% | MT  |
| 70      | Solar          | Owned  | Emery Clawson 138kV                    | Under study in PacifiCorp's 2022 Interconnection Cluster | 25 | 29-33% | UT  |
| 125     | Solar          | Owned  | Huntington—Pinto 345kV                 | Under study in PacifiCorp's 2022 Interconnection Cluster | 25 | 29-33% | UT  |
| 199.9   | Storage        | Owned  | Emery Substation                       | Under study in PacifiCorp's 2022 Interconnection Cluster | 20 | 88-92% | UT  |
| 199.9   | Storage        | Owned  | Emery Substation                       | Under study in PacifiCorp's 2022 Interconnection Cluster | 20 | 88-92% | UT  |
| 199.9   | Storage        | Owned  | Huntington Substation                  | Under study in PacifiCorp's 2022 Interconnection Cluster | 20 | 88-92% | UT  |

|       |         |       |                       |  |    |        |    |
|-------|---------|-------|-----------------------|--|----|--------|----|
| 199.9 | Storage | Owned | Huntington Substation | Under study in PacifiCorp's 2022 Interconnection Cluster | 20 | 88-92% | UT |
|-------|---------|-------|-----------------------|--|----|--------|----|

- Benchmark Resource bids will include costs assumptions consistent with the main RFP document Section 6.C, and specifically Table 4, where the Company lists the characteristics which will be used to determine the Net Cost of benchmark bids. These inputs will be provided to the IEs for review and comment.
- PacifiCorp will administer a competitive supply solicitation(s), on a case-by-case basis, for the wind turbines, solar panels, and battery systems required for all Owned Benchmark Resources. Procurement of equipment for Market Benchmark Resources will be conducted by third-party developers in coordination with PacifiCorp.
- PacifiCorp will administer a separate competitive solicitation(s) to secure firm fixed pricing to engineer-procure-construct and commission the balance of plant for Owned Benchmark Resources. Agreements with contractors for engineering, procurement, construction, and commissioning for Market Benchmark Resources will be conducted by third-party developers in coordination with PacifiCorp.
- All projects are expected to be able to be placed in service no later than December 31, 2027 with the exception of long-lead time resources which will be bid with commercial operations dates no later than December 31, 2028.
- All solar generating resources noted above may be bid as collocated battery storage component up to 100% of the nameplate capacity of the solar project and a four (4) hour duration and may be bid separately as standalone solar subject to applicable bid fee requirements.
- Project efficiencies will be evaluated in coordination with experienced third-party engineers for Owned Benchmark Resources, and by third-party developers for Market Benchmark Resources in coordination with PacifiCorp.
- Transmission requirements, operating requirements, and dispatch requirements for Benchmark Resources will be evaluated pursuant to applicable Large Generator Interconnection Agreements and necessary Transmission Service Agreements for each resource.
- The Benchmark Resources will be constructed in compliance with PacifiCorp's specifications and technical standards.
- The Benchmark Resources will also include an operations and maintenance (O&M) building at each site or an addition to an existing PacifiCorp O&M facility.
- Benchmark Resources will include the following pro forma estimates for operations, maintenance and on-going capital expenditures:
  - Wind: 30 years

- Solar & Solar plus Battery: 25 years
- Battery: 20 years
- Pumped Hydro Storage: 40-50 years (or federal license term)
- The Benchmark Resources costs will include allocated development costs, fees, permitting, project management and equipment costs.