

April 3, 2024

#### VIA ELECTRONIC FILING

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

Attn: Gary Widerburg

**Commission Administrator** 

Re: Docket No. 21-035-52 - Application of Rocky Mountain Power for Approval of

Solicitation Process for 2022 All Source Request for Proposals

Notice of Cancellation of 2022 All Source RFP

On January 26, 2022, PacifiCorp filed its 2022 All Source Request for Proposal ("2022AS RFP") in the above referenced docket. Section 3.a. provided a proposed schedule with some milestones but noted that the schedule is subject to change. On July 25, 2023, PacifiCorp updated its website to inform interested parties of an update to its RFP milestone schedule indicating the selection of the final short list ("2022AS FSL") was scheduled for September 17, 2023.

On September 15, 2023, the Company informed the Commission that the date for PacifiCorp's 2022AS FSL would be delayed and committed to providing additional information by the end of September. On September 23, 2023, the Company notified the Commission that it was suspending the 2022AS RFP PacifiCorp in order to evaluate changing conditions while making critical decisions for the long-term benefit of its system and customers.

As evaluated in PacifiCorp's 2023 Integrated Resource Plan ("IRP"), the Environmental Protection Agency's ("EPA") Ozone Transport Rule ("OTR") significantly restricted energy production in the summer among natural gas and coal-fueled resources in Wyoming and Utah, which triggered a need for the procurement of certain incremental resources. EPA's approval of Wyoming's state OTR plan and the 10<sup>th</sup> Circuit Court of Appeals' stay of EPA's disapproval of Utah's state OTR plan removes the restrictions that limit energy production in the summer from natural gas and coal-fueled resources in Wyoming and Utah. It was prudent and in the best interest of customers to analyze the impact of the EPA's approval of the Wyoming state OTR plan and the stay of the disapproval of the Utah state OTR plan on procurement decisions. On April 1, 2024, the Company published an update to the 2023 IRP that reflects the current status of the OTR. The 2023 IRP Update preferred portfolio demonstrates that with limited procurement of battery resources in the near-term, which can be achieved outside of a request for proposals process, there is a material benefit to scaling down and delaying resource acquisition until after 2030. This outcome supports the company's initial decision to suspend the 2022 All-Source Request for Proposals, and the termination of the 2022 All-Source Request for Proposals. The 2025 IRP will inform the next steps for incremental resource acquisition.

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The 2022AS RFP Milestone Schedule on the Company's website has been updated to reflect the additional information and can be found at the following link:

https://www.pacificorp.com/suppliers/rfps/2022-all-source-rfp.html

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

Very truly yours,

Joelle Steward

Senior Vice President, Regulation and Customer/Community Solutions

cc: Service List

## **CERTIFICATE OF SERVICE**

Docket No. 21-035-52

I hereby certify that on April 3, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

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# **Rocky Mountain Power**

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