

March 2, 2023

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 Administrator

**RE: Docket No. 23-035-10 – PacifiCorp’s 2023 Integrated Resource Plan**  
Rocky Mountain Power’s Request for Extension

PacifiCorp (“PacifiCorp” or “the Company”) requests the Public Service Commission of Utah (“Commission”) grant an extension for the filing of the 2023 Integrated Resource Plan (“2023 IRP”). The Commission established a filing date of March 31 every other year for the Company’s IRPs through its order in the Company’s 2008 IRP, Docket No. 09-2035-01. Recent material changes to the Ozone Transport Rule, the Inflation Reduction Act, resource interconnection rules, the Oregon Clean Energy Plan, and Washington’s Clean Energy Transformation Act required changes to model inputs and constraints requiring a considerable amount of time to implement and verify the accuracy of outputs. The time delay placed PacifiCorp’s ability to provide model output that could be presented to stakeholders for meaningful review in advance of the March 31, 2023, filing deadline in jeopardy. Therefore, although PacifiCorp is prepared to file the 2023 IRP on March 31, 2023, as required, based on the timing of when the IRP results and the preferred portfolio will be ready, stakeholders will not have been given the opportunity for meaningful review in advance of the filing. Therefore, the Company requests the Commission approve the following schedule for the 2023 IRP for the Company to obtain additional stakeholder input prior to finalizing the 2023 IRP:

- March 31, 2023 – File preliminary 2023 IRP with the Commission on an informational basis with non-confidential information
- April 30, 2023 – Deadline for stakeholders to submit comments and feedback directly to the Company through the established public input meeting (“PIM”) process
- May 31, 2023 – File final 2023 IRP

In preparation of the 2023 IRP, the Company has endeavored to undertake a process that addresses the concerns raised by certain parties in the 2021 IRP to allow for more timely receipt of meeting materials and opportunity for meaningful input. The 2023 IRP stakeholder process began in February 2022 with a series of technical workshops focused on energy efficiency assumptions being developed from an updated conservation potential assessment. PacifiCorp began a series of more general public-input meetings in June 2022, which addressed a range of topics describing PacifiCorp’s modeling methodology, inputs, and assumptions for the 2023 IRP. Agenda items covered topics included, but not limited to: resource cost-and-performance assumptions, model function and overview, load forecast, price-policy assumptions, market price assumptions, and transmission options. To date, PacifiCorp has held 10 public-input meetings. All public-input meeting materials, available studies conducted and stakeholder feedback forms to date can be found at: [www.pacificorp.com/es/irp.html](http://www.pacificorp.com/es/irp.html). PacifiCorp has consistently provided meetings materials at least 3 days in advance of the public input meetings.

The Company is currently in the process of finalizing model results for the preferred portfolio and will not be able to present the modeling results to stakeholders prior to the March 31, 2023, filing date. Over the last couple of weeks the Company has met with stakeholders to present an option to accommodate the needs of a timely filing as well as the opportunity for stakeholders review and feedback. The Company proposed to file the 2023 IRP on March 31, 2023, and then use the first 60 days after filing to solicit and incorporate feedback from the stakeholders through continued public input meeting (“PIM”) process. At the PIM held on February 23, 2023, several Utah parties expressed concern with the proposed plan and suggested the Company formally request Commission approval of an extension.

The Company recognizes it has deviated from the typical IRP process through its requests for a four-month extension in the 2019 IRP and a five-month extension in the 2021 IRP. The Company does not approach the Commission with another request to modify the established process without considering all available options. In the Order Granting Request for Extension to File issued by the Commission on March 15, 2021, in the 2021 IRP, the Commission shared parties concerns for a consistent, dependable filing deadline but also recognized the “most fundamental objective of this process is to obtain an accurate, complete, and useful IRP that is informed by a process of appropriate and thorough stakeholder input.”<sup>1</sup> The Commission again sent a clear message of the importance of stakeholder participation when it declined to acknowledge the 2021 IRP stating “We are hopeful that our decision not to acknowledge the 2021 IRP will motivate PacifiCorp to show greater respect for stakeholders’ participation in the next IRP development cycle.”<sup>2</sup>

Based on the feedback received to date and the need to balance meaningful stakeholder review with and accurate and useful IRP, the Company requests the Commission grant a two-month extension to allow for additional stakeholder review before the final IRP is adjudicated by the Commission.

Therefore, for the reasons described above, the Company respectfully requests the Commission issue an order granting the Company a one-time modification of the IRP process by March 30, 2023.

Sincerely,



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

Enclosures

cc: Service List Docket No. 21-035-09

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<sup>1</sup> PacifiCorp’s 2021 Integrated Resource Plan, Docket No. 21-035-09, Order Granting Request for Extension to File issued March 15, 2021, p. 3.

<sup>2</sup> PacifiCorp’s 2021 Integrated Resource Plan, Docket No. 21-035-09, Order issued June 2, 2022, p. 18.

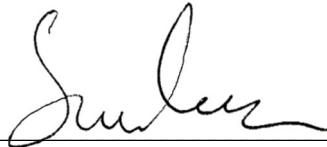
**CERTIFICATE OF SERVICE**

Docket No. 21-035-09

I hereby certify that on March 2, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

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