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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Application of PacifiCorp’s 2023 Integrated Resource Plan</p>	<p>Docket No. 23-035-10</p> <p>COMMENTS OF WESTERN RESOURCE ADVOCATES</p>
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I. INTRODUCTION

In accordance with the March 3, 2023, Notice and Request for Comments of the Utah Public Service Commission (“Commission”), Western Resource Advocates (“WRA”) submits these comments on PacifiCorp’s Request for Extension to file the 2023 Integrated Resource Plan. WRA appreciates the opportunity to comment on PacifiCorp’s Request for Extension to file its 2023 IRP. To ensure that the Company files the most thorough, accurate, and environmentally compliant IRP possible given the changing planning environment, WRA supports PacifiCorp’s request for a two-month filing extension of its 2023 IRP as the most appropriate solution to PacifiCorp’s delayed results. Filing the final IRP on the original date of March 31, 2023, without first previewing the Preferred Portfolio with stakeholders and providing them with an opportunity for meaningful input contravenes the intent of the Commissions requirements in the

1992 Order on Standards and Guidelines.¹ And filing on March 31, but without providing stakeholders access to confidential modeling inputs and outputs, would not constitute a complete filing. Granting the two-month extension with an extended stakeholder comment deadline of April 30, 2023, better adheres to the Company’s statutory requirement to provide opportunity for public input. Stakeholders can meaningfully review the IRP upon receiving a complete filing on May 31 that includes the confidential work papers.

II. COMMENTS

WRA acknowledges that recent developments, including but not limited to, the passage of the landmark Inflation Reduction Act (“IRA”) and Infrastructure Investment and Jobs Act (“IIJA”), the EPA’s pending implementation of the Cross-State Air Pollution Rule (“CSAPR”) for states with Company-owned coal units, and recent revisions to energy storage interconnection procedures² in the Company’s Open Access Transmission Tariff (“OATT”), have added complexity to the IRP modeling process. With respect to the IRA and IIJA, WRA expects the Company’s modeling to reflect robust representation of new federal tax credits for zero-carbon generation, behind-the-meter distributed energy resources, and low-cost financing opportunities for retirement of thermal generators. With respect to the impacts of the CSAPR, WRA expects substantial changes to the modeled dispatch of its coal fleet, particularly during ozone season. Finally, with respect to revisions to its OATT, WRA anticipates that more realistic

¹ Standards and Guidelines for Integrated Resource Planning, Docket 90-2035-01, Order issued June 18, 1992.

² PacifiCorp’s Revisions to Generator Interconnection Procedures Regarding Electric Storage Resource, FERC Docket No. ER23-754-000, December 30, 2022,

<https://pscdocs.utah.gov/misc/22docs/2299901/326528RMPRvsnsGnrtrIntrcnctnPrcdrsEletrcSorgeFERCER2375412-30-2022.pdf>.


operating assumptions of energy storage could allow increased interconnection capacity for standalone energy storage resources without triggering expensive transmission upgrades.

III. CONCLUSION AND RECOMMENDATION

WRA contends that accurate modeling of these developments, among others, is necessary to produce an IRP that optimally achieves system reliability, minimizes adverse environmental and health impacts, and mitigates ratepayer impacts associated with the Company's selected portfolio and subsequent operations. We believe the Company should be granted a two-month extension in order to conduct thorough modeling and allow ample time for stakeholder review of confidential modeling inputs and results.

Dated this 10th day of March, 2023.

Respectfully submitted,



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CERTIFICATE OF SERVICE

Docket No. 23-035-10

I hereby certify that a true and correct copy of the foregoing was served by email this 10th day of March 2023 on the following:

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