



Date: October 10, 2023
To: Utah Public Service Commission (psc@utah.gov)
Jana Saba (jana.saba@pacifcorp.com)
From: Kate Bowman, Regulatory Director, Interior West, Vote Solar
(kbowman@votesolar.org)
Subject: Docket No. 23-035-10 (2023 Integrated Resource Plan): Vote Solar Questions for October 24, 2023 Technical Conference

1. Private Generation Forecast assessment completed by DNV:

DNV's assessment models lower technology costs and higher energy prices to forecast a "high" private generation forecast, but finds that the "high" forecast results in only 0.5% additional cumulative capacity additions compared to the base case. For comparison purposes, the "high" forecast used in the 2021 IRP was approximately 53% higher than the corresponding "base" forecast.

- a) Please explain why the "high" and "base" case forecasts in DNV's analysis are so similar.
- b) Please explain how the assumptions and methodologies used to develop the private generation forecast for the prior 2021 IRP differ from those used in the 2023 IRP.
- c) Please describe how actual distributed solar adoption compares to the forecasts prepared as part of the prior 2021 IRP. For example, does actual distributed solar adoption in the years 2021 – 2023 most closely resemble the "low," "base," or "high" forecast provided in the 2021 IRP?
- d) Does the IRP modeling process account for the location of distributed solar and/or storage resources, or evaluate whether distributed solar and/or storage resources in a specific location provide higher value (for example, in areas where transmission constraints exist).

2. Regarding the Inflation Reduction Act:

- a) Vote Solar submitted a stakeholder feedback form requesting additional information about how DNV's private generation forecast accounts for the impacts of the Inflation Reduction Act (IRA).¹ On July 13 2023, PacifiCorp

¹ Relevant programs and tax credits include:

- Additional 10% credit for meeting domestic content requirements.
- Additional 10% credit for projects that are located in an "energy community"
- Provisions of the Section 48(e) Environmental Justice Wind and Solar Program, including
 - Category 1) Additional 10% credit for qualified solar facilities located in a low-income community.
 - Category 2) Additional 10% credit for qualified solar facilities on Tribal land
 - Category 3) Additional 20% credit for projects that are part of a qualified low-income residential building project

responded that “Our study does not estimate the content and location (beyond the State level) of proxy customer private generation resource installations and therefore does not include explicit assumptions around these credits.”² Is PacifiCorp evaluating how the location- and income-qualified provisions of the IRA apply within its service territory, and how they will affect adoption of private generation and/or customer-sited storage?

- b) Is PacifiCorp evaluating how provisions of the IRA will impact adoption of other customer-sited technologies, such as electrified appliances or electric vehicles?
- c) Are the impacts of location- and income-qualified tax credits offered through the IRA accounted for when developing the 2023 IRP load forecast?
- d) Has PacifiCorp evaluated how the location- and income-qualified provisions of the IRA are likely to apply to new generation resources built within its territory? For example, has PacifiCorp evaluated which parts of its service territory are “energy communities,” low-income” communities, or Tribal lands per the definitions of the IRA?
- e) Did PacifiCorp model availability of the Energy Communities bonus adder when determining supply-side resource costs?
- f) Does the IRP analyze the opportunity to use the DOE’s [Energy Infrastructure Reinvestment \(EIR\) financing](#) as a source of financing for generation resources? What steps has PacifiCorp taken to explore use of the EIR financing program?

3. Requests for Proposals:

- a) Are distributed energy resources or energy efficiency/demand response resources permitted to bid into a PacifiCorp Request for Proposals?
- b) How does PacifiCorp plan to ensure that future resource selections maximize the benefits available through the IRA?
- c) What information, if any, will PacifiCorp request of bidders to identify use of IRA tax benefits?

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- Category 4) Additional 20% credit for projects that deliver qualified low-income economic benefits
 - \$29 billion Greenhouse Gas Reduction Fund
 - \$7 billion EPA “Solar For All” competition

² PacifiCorp Stakeholder Feedback Form response available at:
[https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023-irp/2023-irp-comments/2023.049.%20Votesolar%205-1-23%20\(with%20response\)%20.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023-irp/2023-irp-comments/2023.049.%20Votesolar%205-1-23%20(with%20response)%20.pdf)