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October 10, 2023

Utah Public Service Commission  
Heber M. Wells Building  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, UT 84111  
psc@utah.gov

Jana Saba  
Rocky Mountain Power  
jana.saba@pacificorp.com

**RE: Docket No. 23-035-10  
PacifiCorp's 2023 Integrated Resource Plan  
WRA Questions for Technical Conference**

Dear Commissioners and Ms. Saba:

Below are questions submitted by Western Resource Advocates (WRA) for consideration at the October 24, 2023 technical conference for Docket No. 23-035-10.

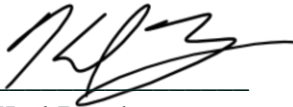
- 1) In its 2023 RFP Announcement issued September 29, 2023, the Company identifies four “key drivers” for its decision to suspend the 22 All-Source RFP (“22AS RFP”). For each driver, please explain its role in the Company’s decision to suspend the 2022AS RFP.
- 2) In the 2023 RFP Announcement the Company states: “No final shortlist will be announced while the 2022AS RFP is paused. Details on resumption and bid eligibility will be forthcoming.” In what timeframe will these details be forthcoming?
- 3) PacifiCorp further states: “PacifiCorp will provide updates periodically until the 2022AS RFP is resumed or terminated.”
  - a) Please explain on what basis PacifiCorp will decide to “resume” or “terminate” the RFP.
  - b) Please provide information on factors guiding the timing of its decision to terminate or resume the 2022AS RFP process. In what timeframe does the Company intend to make this decision?
- 4) If the Company decides to resume the 2022AS RFP, please explain whether bidders will have to resubmit bids or whether the received and scored bids will be reinstated.
- 5) How could a lengthy suspension or even a termination of the 2022AS RFP affect the company’s short-term capacity position during the period 2023-2026? How soon does the Company need to acquire additional resources to avoid the risk of over market reliance? Provide detailed information

regarding the impacts of a delay in resource acquisition on the Company's capacity position by East and West balancing authority areas.

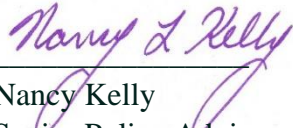
- 6) Explain how the Company plans to meet its load and capacity obligations and keep sufficient reserves without 1,345 MW of wind and solar resources co-located with 600 MW of battery storage resources from the 2022AS RFP.
  - a) If PacifiCorp anticipates increased dispatch of coal resources due to the suspension of the 2022AS RFP, please identify which coal resources, at the unit level, are expected to be dispatched to meet the Company's load.
    - i) Quantify the incremental dispatch in MWh from coal units.
    - ii) Quantify fuel, variable O&M, and fixed O&M costs associated with incremental dispatch of coal units.
    - iii) Quantify total emissions and emissions compliance costs associated with increased dispatch of coal units.
  - b) If PacifiCorp anticipates increased dispatch of natural gas resources due to the suspension of the 2022AS RFP, please identify which natural gas resources, at the unit level, are expected to be dispatched to meet the Company's load.
    - i) Quantify the incremental dispatch in MWh from natural gas units.
    - ii) Quantify fuel, variable O&M, and fixed O&M costs associated with incremental dispatch of natural gas units.
    - iii) Quantify total emissions and emissions compliance costs associated with increased dispatch of natural gas units.
  - c) If PacifiCorp anticipates increased market purchases due to the suspension of the 2022AS RFP, provide the quantity of incremental market purchases, and an assessment of the availability, risk, and expected cost of any incremental market purchases. Provide this information by East and West balancing authority areas.
  - d) If PacifiCorp anticipates increased dispatch of hydropower resources due to the suspension of the 2022AS RFP, please identify which hydropower resources, at the unit level, are expected to be dispatched to meet the Company's load.
    - i) Quantify the incremental dispatch in MWh from hydropower units.
    - ii) Quantify variable O&M, and fixed O&M costs associated with incremental dispatch of hydropower units.
- 7) Provide an updated 2023 IRP Action Plan as a result of the suspension of the 2022 AS RFP.
  - a) Include any and all changes in the Preferred Portfolio, including timing and quantity, of renewable resource procurement, unit retirements or conversions, and emission control technology installations.
  - b) Provide an updated risk adjusted PVRR of the new Preferred Portfolio.

- c) Explain all changes to inputs in PLEXOS that the Company will make or has made in order to establish its revised Action Plan.
  - d) Provide an updated emissions trajectory during the planning horizon consistent with the suspension of the 2022AS RFP.
- 8) If the Company is unable to provide a revised Action Plan at this time, please provide a detailed timeline of steps the Company will complete to update the 2023 IRP modeling results and subsequent Action Plan.

Sincerely,



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Western Resource Advocates



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