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Counsel for Sierra Club

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2023 Integrated Resource Plan

Docket No. 23-035-10

Pursuant to the Scheduling Order issued June 27, 2023, by the Public Service

Commission of Utah, Sierra Club hereby submits the following questions for discussion at the

## October 24, 2023 technical conference:

- 1. Please explain how the decision to pause the 2022 all-source request for proposal will impact resource acquisitions assumed under the Preferred Portfolio, resource retirement dates, and forecasted emission trajectories. Sierra Club additionally supports the questions submitted by Western Resource Advocates regarding this topic being addressed by PacifiCorp at the technical conference.
- 2. Please explain the difference between the "Base Limited" and "Base" runs (initial LT model runs), including any difference in assumptions and inputs between the two runs. Please also specify which reliable portfolio/variant comes from the "Base" run:
  - a. LT\_6529\_23I.LT.Initial Run.20.PA0\_.EP.MM.Base Limited.
  - b. LT\_6530\_23I.LT.IR.20.PA0\_.EP.MM.Base
- 3. Granularity Adjustments
  - a. Please provide an intuitive explanation for why some coal units had larger granularity adjustments than gas units at the same location;
  - b. Please explain if capital costs were factored into the granularity adjustment calculation, and, if so, why.
- 4. Please explain why PacifiCorp used incremental costs for Jim Bridger base coal fuel costs rather than average costs, given that the IRP is a long-term planning exercise.

- 5. Please explain why PacifiCorp did not reoptimize all variant portfolios, including P18 and P19, and whether PacifiCorp anticipates that not re-optimizing the portfolios resulted in excessive resources being included in the variant portfolios.
- 6. In PacifiCorp's modeling of surplus interconnections, please explain why storage resources were not paired with current fossil assets.

| Dated: 10 October 2023 | Respectfully submitted, |
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/s/
Rose Monahan
Sierra Club Environmental Law Program