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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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IN THE MATTER OF PACIFICORP'S 2023 INTEGRATED RESOURCE PLAN	Docket No. 23-035-10
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**COMMENTS OF WESTERN RESOURCE ADVOCATES**

December 12, 2023

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Pursuant to the June 27, 2023 Scheduling Order and Notice of Technical Conference, Western Resource Advocates (“WRA”) hereby submits these comments to the Public Service Commission of Utah (hereafter “Commission” or “PSC”) regarding PacifiCorp’s 2023 Integrated Resource Plan (“IRP”).

WRA is a non-profit organization that addresses climate change to sustain the environment, economy, and people of the West. We work with decision-makers and other advocates to advance clean energy, protect air, water, and wildlife—and sustain the lives and livelihoods of the West. Our Clean Energy Program includes policy experts, economists, and attorneys and develops and implements evidence-based solutions to realize the benefits of a decarbonized electricity system that is reliable and economic for customers.

## I. INTRODUCTION

WRA generally supports PacifiCorp's 2023 IRP. More fundamentally we support its vision of a "truly connected West, where the transition to a net-zero energy system delivers safe, reliable, affordable power."<sup>1</sup> A rapid transition to a net-zero economy is essential to avert climate crisis. While the entire economy must evolve quickly, the speed at which the electricity sector must transition is even greater, as a transformed electricity industry will be necessary to support the transition in other sectors, including buildings and transportation.

The 2023 IRP and its Preferred Portfolio are an extension and refinement of the 2021 IRP, and further outline PacifiCorp's continued plan to meet its future needs with a combination of significant new transmission, energy efficiency and load control, solar, storage, wind, and non-emitting dispatchable resources. However, in contrast to the 2021 IRP Preferred Portfolio, the 2023 IRP Preferred Portfolio adds significantly more wind and solar, moves forward in time two nuclear units, retires or converts to natural gas all but two coal-fired units by 2032, and identifies a significant amount of battery storage to be added over the next decade.

As a result, the 2023 IRP Preferred Portfolio moves PacifiCorp towards deeper emissions cuts than did the 2021 IRP. Relative to a 2005 baseline, optimization of the 2023 IRP Preferred Portfolio resources results in forecast emissions reductions of 78% in 2030, 90% in 2035, 90% in 2040, 94% in 2045, and 100% in 2050.<sup>2</sup> We appreciate this emissions reductions trajectory and hope that it will be achieved through the rapid acquisition of all cost-effective, non-emitting resources made available to the Company through its solicitation activities, including wind, off-

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<sup>1</sup> *PacifiCorp 2023 Integrated Resource Plan, Amended Final, Volume 1*, at 1 [hereinafter *2023 IRP Volume 1*].

<sup>2</sup> *Id.* at 20.

shore wind, solar, geothermal, battery storage, and pumped storage, as well as dispatchable non-emitting generation.

Further, WRA appreciates PacifiCorp's leadership in considering emerging technologies. We appreciate PacifiCorp's willingness to evaluate clean generation technologies like advanced nuclear and non-emitting peaking units. In addressing new technologies alongside proven resources, the Company satisfies the requirement to consider "all present and future resources, including future market opportunities (both demand-side and supply-side), on a consistent and comparable basis."<sup>3</sup>

In these comments we do not take a position regarding whether the Commission should acknowledge, or not, the 2023 IRP based on the requirements of its 1992 Report and Order on Standards and Guidelines ("Guidelines").<sup>4</sup> While it is our view that PacifiCorp has, for the most part, complied with the requirements of the Guidelines, time constraints appear to have negatively impacted the accuracy of the Company's modeling, and the opportunity for public input was constrained.

Our comments are organized as follows. First, we identify planning delays as an ongoing feature of PacifiCorp's integrated resource planning that worsen during times of modeling advancements and industry uncertainty. We also discuss the tension between developing a well-considered plan that incorporates meaningful public input within the time constraints of a year-long modeling process undertaken every two years plus an additional update provided in the off year. We suggest a procedural change for Utah that could accommodate delayed filings while

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<sup>3</sup> *In the Matter of Analysis of an Integrated Resource Plan for PacifiCorp*, Docket No. 90-2035-01, Report and Order on Standards and Guidelines issued June 18, 1992 at 42-43 [hereinafter Guidelines] (Guideline 4(b)).

<sup>4</sup> *Id.*

still providing “ample opportunity for public input and information exchange during the development of [the] plan.”<sup>5</sup> As contemplated, the change in process could extend the public input process within Utah without requiring changes to other states’ IRP practices. Finally, given recent developments not incorporated in PacifiCorp’s planning that could materially impact the Preferred Portfolio, including the suspension of the Company’s 2022 All-Source RFP and the 10<sup>th</sup> Circuit Court’s stay of the Ozone Transport Rule, as well as concerns with the accuracy of the modeling results, we propose that the Commission formally consider the IRP Update for Acknowledgement.

## **II. A STRUCTURAL CHANGE IN PROCESS IS NEEDED TO ADDRESS PLANNING DELAYS**

PacifiCorp is a unique and complex utility serving customers in six states with generation and transmission assets reaching across much of the United States’ portion of the Western Interconnection. It is under the jurisdiction of six state utility commissions plus the Federal Energy Regulatory Commission and must comply with the legal requirements of each state plus federal law. PacifiCorp’s diversity, size, and reach results in multiple benefits for the customers it serves, but its complexity also creates planning challenges.

PacifiCorp is directed by the states that have in place planning requirements to submit a biennial IRP.<sup>6</sup> However, in practice, PacifiCorp conducts an annual IRP. It develops its required IRP and conducts a public input process for participating stakeholders over the course of a single year, unless it seeks delays, and then it files an IRP Update the following year. In Utah, the IRP Update is typically accompanied by a letter that informs the Commission that the IRP Update is

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<sup>5</sup> *Id.* at 41-42 (Guideline 3).

<sup>6</sup> “The Company will submit its Integrated Resource Plan biennially.” *Id.* at 41.

for informational purposes. The development of the IRP Update does not include a public input process.

It appears to WRA that PacifiCorp's *year-long* planning does not allow sufficient time to develop an IRP that addresses PacifiCorp's complex planning environment while providing the public with opportunity for meaningful participation as required by Guideline 3.<sup>7</sup> Developing a well-considered plan that incorporates meaningful public input within the limitations of an annual planning process appears unworkable during times of industry uncertainty, which is precisely when sound planning and public involvement is most pressing.

#### **A. Time Delays are a Structural Feature of PacifiCorp's Resource Planning**

The need for additional time to develop a plan that can mitigate the risks inherent in the rapidly changing electric industry is demonstrated by recent requests for time extensions. Over the last three IRP cycles, as the transition within the electric industry has accelerated with its rapidly changing relative costs and inherent uncertainties, PacifiCorp has sought and received time extensions totaling more than a year. The 2019 IRP was delayed by six and a half months, the 2021 IRP by five months, and the current IRP by two months, which, as we discuss further, was too short of a delay to produce an accurate and complete IRP and allow "ample opportunity for public input and information exchange."<sup>8</sup>

However, time delays and the need for extensions are not limited to the past three IRP cycles. In fact, a timely IRP appears to be the exception. Exhibit 1 contains a five-page table

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<sup>7</sup> "IRP will be developed in consultation with the Commission, its staff, the Division of Public Utilities, the [Office] of Consumer Services, appropriate Utah state agencies and interested parties. PacifiCorp will provide ample opportunity for public input and information exchange during the development of its Plan." *Id.* at 41-42.

<sup>8</sup> *Id.* at 41-42 (Guideline 3).

that summarizes PacifiCorp IRP procedural history dating back to PacifiCorp's first IRP, Resource and Marketing Planning Program (RAMPP 1) and the development of IRP requirements.<sup>9</sup> Of the fifteen planning cycles undertaken after issuance of the Guidelines in 1992, three were unequivocally timely; one provided a partial filing on the required date but added an addendum three months later; three were late by days rather than months; but six, close to half, were more significantly delayed. Delays ranged from one month to two-and-a-half years with a median delay of five months.

Exhibit 2 provides a compendium of IRP procedural history in Utah beginning with RAMPP 6, the sixth IRP to be filed in Utah. It includes, when available, PacifiCorp's requests for time extensions and the Commission orders approving the requests. In some cases, delays do not appear to have been accompanied by requests for time extensions, and, in other cases, orders were not forthcoming. While incomplete, Exhibit 2 adds color to the procedural history summarized in Exhibit 1.

As can be recognized by reading through Exhibit 2, PacifiCorp has had many different reasons for seeking delays, but lengthier delays were often associated with industry and policy uncertainty. In the late 1990's, uncertainties arising from state efforts to deregulate retail electricity resulted in a two-and-a-half-year delay. In more recent IRP cycles, resource

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<sup>9</sup> Consideration of integrated resource planning for Utah began in February of 1990 when the PSC opened Docket No. 90-2035-01, "In the Matter of the Analysis of an Integrated Resource Plan for PacifiCorp" and ordered the recently-merged Company to file its recently completed least-cost planning report entitled Resource and Marketing Planning Program (RAMPP I). In an order issued on May 25, 1990, the PSC determined that the RAMPP 1 approach was reasonable and requested that the Division of Public Utilities lead a taskforce to "identify and analyze relevant integrated resource planning issues that would require explicit Commission decision." The Taskforce filed its report in September 1990. The Commission issued Draft Standards and Guidelines on September 3, 1991, and issued its final order on June 18, 1992. The Order addressed threshold issues and established planning standards and guidelines to be followed by the merged utility in developing its resource plan. Guidelines, *supra* note 3, at 41-42.

procurement efforts, changes and improvements to modeling platforms, as well as uncertainties arising from state policies and federal emissions limitations have delayed planning results.

WRA's purpose in providing this extensive procedural background is not to directly fault the Company, but to suggest that a structural problem exists that requires a solution. Delay appears to be a structural feature of PacifiCorp's resource planning that is not directly tied to Company ownership or IRP management, since the delays extend across three owners, multiple management structures, and multiple IRP managers and teams.

Specifically, a 12-month IRP process appears to be an insufficient length of time to produce "an accurate, complete and useful IRP"<sup>10</sup> while ensuring "that [it] is informed by appropriate and thorough stakeholder input,"<sup>11</sup> particularly in times of significant uncertainty when public input and information exchange is most needed.

### **B. Meaningful Public Input is an IRP Requirement**

Guideline 3 requires that PacifiCorp's resource plan "be developed in consultation with the Commission, its staff, the Division of Public Utilities, the [Office] of Consumer Services, appropriate Utah state agencies and interested parties." It further requires PacifiCorp to "provide ample opportunity for public input and information exchange during the development of its Plan."<sup>12</sup>

Adherence to Guideline 3 has created challenges in past planning cycles, and in relatively recent orders the PSC has provided extensive direction regarding its interpretation of this guideline. In its Report and Order on PacifiCorp's 2017 IRP, the PSC stated:

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<sup>10</sup> *PacifiCorp's 2023 Integrated Resource Plan*, Docket No. 23-035-10, Order Granting Request for Extension to File issued March 28, 2023, at 3 [hereinafter 2023 Order Granting Request for Extension].

<sup>11</sup> *Id.*

<sup>12</sup> Guidelines, *supra* note 3, at 41-42 (Guideline 3).

We view the IRP process as one in which parties are able to provide input and receive information on relevant issues, inputs, models, and *results* affecting the current IRP. Therefore, the opportunity for all parties to examine and provide information *during the IRP development, rather than after the fact*, is an important aspect of the IRP process [emphasis added].<sup>13</sup>

In its Order on the 2021 IRP, the PSC stated:

The purpose of the process is not to allow [stakeholders] an early preview of what PacifiCorp has unilaterally elected to do. The purpose is to allow them an opportunity to provide meaningful feedback at each stage of a *collaborative* process. Guideline 3 is clear: the IRP is to be developed “in consultation” with stakeholders who must enjoy “ample opportunity for public input and information exchange *during the development of [the plan]*” [emphasis in the original].<sup>14</sup>

And, in its Order granting a time extension for filing the 2023 IRP, the PSC says:

The PSC recognizes the most fundamental objective of this process is to obtain an accurate, complete, and useful IRP that is *informed by* appropriate and *thorough* stakeholder input [emphasis added].<sup>15</sup>

The Commission has been clear, PacifiCorp must provide stakeholders with the opportunity to “inform”<sup>16</sup> the selection of the final plan, not to provide them with “an early preview of what PacifiCorp has unilaterally elected to do.”<sup>17</sup> The process must be “collaborative,”<sup>18</sup> and stakeholders must be given an opportunity “to provide input and receive information on relevant issues, inputs, models, and results.”<sup>19</sup>

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<sup>13</sup> *PacifiCorp’s 2017 Integrated Resource Plan*, Docket No. 17-035-16, Report and Order issued March 2, 2018 at 7-8 [hereinafter 2017 IRP Order].

<sup>14</sup> *PacifiCorp’s 2021 Integrated Resource Plan*, Docket No. 21-035-09, Order issued June 2, 2022, at 14 [hereinafter 2021 IRP Order].

<sup>15</sup> 2023 Order Granting Request for Extension, *supra* note 10, at 3.

<sup>16</sup> *Id.*

<sup>17</sup> 2021 IRP Order, *supra* note 14, at 14.

<sup>18</sup> *Id.*

<sup>19</sup> 2017 IRP Order, *supra* note 13, at 7.



### **C. The 2023 IRP Cycle was Developed in the Context of a Rapidly Changing Policy Landscape that Delayed Planning Results**

The 2023 IRP cycle demonstrates WRA’s contention that a 12-month IRP process can be an insufficient length of time to develop “an accurate, complete, and useful IRP that is informed by appropriate and thorough stakeholder input.”<sup>20</sup> The 2023 IRP Preferred Portfolio was developed and the public input process conducted in the context of a rapidly changing policy landscape. Resource opportunities as well as legal obligations had to be evaluated and modeled. As PacifiCorp explains in its March 2, 2023, request for a time extension:

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.<sup>21</sup>

Due to the time required to update and verify the model, the 2023 IRP modeling results were significantly delayed. In the past, when events have resulted in PacifiCorp’s inability to meet the expected schedule, PacifiCorp has sought time extensions. Therefore, modeling results, even if late, have been made available to stakeholders to review, provide feedback, and request additional runs ahead of finalizing an IRP. However, in this case, stakeholders were not alerted to the extent of the expected delays and looked for modeling results as early as the September 2022 Public Input Meeting (“PIM”). But modeling results were not available in September, nor were they available for the October PIM, the December PIM, the January PIM, or the February PIM, the last to be held ahead of the March 31 filing deadline.

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<sup>20</sup> 2023 Order Granting Request for Extension, *supra* note 10, at 3.

<sup>21</sup> Rocky Mountain Power’s Request for Extension filed March 2, 2023 at 1 [hereinafter RMP’s Request for Extension].

On February 23, as part of the final PIM, PacifiCorp proposed a schedule that it hoped would keep it in compliance with both Guideline 3 and the March 31 deadline. It proposed to file a preliminary 2023 IRP on March 31, give stakeholders a month to review and provide comments to the utility, due by April 30, and then file the 2023 IRP Amended Final on May 31. It had not initially planned to seek a time extension, thinking that by making an initial March 31 filing, it would meet the deadline.

However, participants from the Utah regulatory agencies explained that a Preliminary 2023 IRP without supporting workpapers, etc. could not be considered a complete filing and would not meet the deadline. They encouraged PacifiCorp to seek an extension. WRA urged the Company to seek a much longer extension than the two months it had proposed to ensure that the modeling was sound, that stakeholders had sufficient time to evaluate and provide input, and that the Company had sufficient time to respond to and incorporate stakeholder feedback into the selection of the Preferred Portfolio. However, when PacifiCorp filed its Request for Extension on March 2, 2023, it kept the same schedule it had proposed. It requested a two-month extension from March 31 to May 31.

**D. Time Constraints Limited the Accuracy and Completeness of the filed IRP and Short-Circuited Stakeholders' Opportunity to Provide Meaningful Feedback**

During times of rapid change, a tension can arise between timely filing and other objectives, and, in our view, PacifiCorp inappropriately prioritized timeliness over accuracy and public involvement. The Preliminary 2023 IRP filed March 31, 2023, the 2023 IRP Amended Final filed May 31, 2023, and the accompanying workpapers, are rife with errors, far more than is typical, and many of the portfolio results simply don't make sense.

As an illustration, several portfolios show inexplicable disparities particularly in early years where system resources should be more or less identical. One example is a comparison of portfolio Variant P05-No Nuclear<sup>22</sup> and P06-No Forward Technology.<sup>23</sup> Given that nuclear and non-emitting peakers are not selected in either portfolio until 2030, WRA expected that these portfolios would differ only in future years. However, large discrepancies in market purchases appear in the first three years of the modeling period, despite no difference in system need or expansion options in these early years. These are shown in the table below.

Resource	P05-No NUC			P06-No Forward Tech		
	2023	2024	2025	2023	2024	2025
Expansion Options						
Front Office - Selected Markets	963	1,000	1,000	-	-	-
Front Office Transactions - Winter	1,577	1,635	914	87	285	294
Front Office Transactions - Summer	1,031	1,039	1,392	751	877	455

We saw a similar discrepancy between the P12 Variant and the P23 Variant.<sup>24</sup> The P12 Variant retires all coal by year-end 2029 and all natural gas resources by year-end 2039. The P23 Variant retires all coal by year-end 2029 but does not force the retirement of natural gas. In comparing these two portfolios, we had again expected similarities in the early years, with the differences showing up later in the portfolio when the natural gas units were forced to retire. But this was not the case. The significant differences between the portfolios showed up in market transactions in the first half of the planning period. These discrepancies and others undermined our confidence in the results and support our view that the IRP was filed before it was ready.

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<sup>22</sup> 2023 IRP Data Disk, “(P)-LT-7370-23I.LT.Reliable.20.PA1-.EP.MM.PP-V5 No Nuc-NonE.xlsb”, Tab “Portfolio Summary”, filed May 31, 2023.

<sup>23</sup> 2023 IRP Data Disk, “(P)-LT-20547-23I.LT.Reliable.20.PA1-.EP.MM.PP-V6 No Future Tech v120.6.xlsb”, Tab “Portfolio Summary”, filed May 31, 2023.

<sup>24</sup> 2023 IRP Volume 1, *supra* note 1, at 267.

Our opportunity to review and provide substantive comments to PacifiCorp was also highly constrained. The initial documents were provided on March 31, supporting documentation wasn't made available until April 17, and the confidential workpapers weren't made available until after comments were due to PacifiCorp. The many questions we did pose in our comments were not addressed in the 2023 IRP Amended Final and the many typos that we identified in the Preliminary 2023 IRP remained in the 2023 IRP Amended Final.

The Company attempted to be responsive to stakeholders, but a month to review stakeholder comments, respond, and incorporate stakeholder feedback from across its five participating states<sup>25</sup> was highly unrealistic, if not impossible. In effect, the two-month delay did nothing more than allow stakeholders “an early preview of what PacifiCorp ... unilaterally elected to do.”<sup>26</sup>

**E. In Times of Industry Change, a 12-Month Process Can Be Too Short to Produce a Well Vetted, Complete, and Accurate IRP and Engage the Public Meaningfully**

We do not raise these issues to suggest the Company blatantly disregarded its compliance obligations. It appears to us that the Company did its best to achieve the unachievable, and we appreciate its efforts to be responsive to public input and try to meet both objectives simultaneously. As an example of how PacifiCorp tried to respond to public input, between the submittal of comments on April 30 and the filing of the 2023 IRP Amended Final on May 31, PacifiCorp ran two additional portfolios, the results of which were incorporated into the 2023 IRP Amended Final. We had requested one of the runs that was modeled, and we appreciate PacifiCorp's responsiveness and willingness to accommodate our request.

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<sup>25</sup> Representatives from California do not participate.

<sup>26</sup> 2021 IRP Order, *supra* note 14, at 14.

Our point is that a 12-month process can be too short a length of time to produce “an accurate, complete, and useful IRP” *and* provide stakeholders an opportunity for meaningful engagement in its development, particularly when new resources are needed, the industry is evolving quickly, or the policy landscape is rapidly changing. While it may be possible for the utility to develop a timely IRP while working in isolation, involving the public meaningfully necessarily takes more time. We believe the tension between timeliness and public participation is a structural issue that requires a structural response.

**III. A PROPOSED PROCEDURAL CHANGE FOR UTAH COULD ACCOMMODATE TIME DELAYS AND ADDRESS THE TENSION BETWEEN TIMELINESS, ACCURACY, AND GUIDELINE 3**

The Guidelines require PacifiCorp to file its IRP biennially. However, as previously discussed, PacifiCorp effectively files an annual IRP. It develops its required IRP and conducts a public input process for participating stakeholders over the course of a single year (unless it requests time extensions). It files an IRP Update the following year, without an accompanying public input process, which is treated as informational.

WRA proposes a procedural change for Utah that we think could address the tension between timeliness, accuracy, and Guideline 3 while accommodating time delays. Within Utah, the first IRP that is developed with input from the six-state public input process, whether filed by March 31 or at a later date, along with the accompanying workpapers, could be considered “draft” for Utah’s procedural purposes. A proceeding would be opened, and PacifiCorp would respond to Utah parties’ questions and concerns which it would then incorporate into the IRP Update filed the following March 31. The IRP Update rather than the initial filing would be filed in Utah for acknowledgement and parties would provide comments to the Commission on the IRP Update.

There is some justification for thinking this approach could work. The 2021 IRP was not filed until September 1, 2021. Despite the late filing, the 2021 IRP Update was filed March 31, 2022, consistent with its due date.

WRA thinks that this change to the sequence in which Utah evaluates the initially filed IRP and the IRP Update could assist PacifiCorp in meeting Utah's requirement for public involvement, consistent with Guideline 3 and past Commission orders. Further, it would not require changes to any other state's processes or proceedings, although information garnered from their processes could be used to inform Utah's, and other states could adopt our process if they found value in it.

Prioritizing Utah's needs while contemplating the effect on other states is required by the Guidelines:

“The planning standards and guidelines must meet the needs of the Utah service area, but since coordination with other jurisdictions is important, must not ignore the rules governing the planning process already in place in other jurisdictions.”<sup>27</sup>

Our purpose in proposing this change in Utah's process is to initiate a conversation within Utah regarding how we might address the tension between a timely filing and public involvement, a tension that appears to us to be structural. We are aware that our proposal is preliminary. To encourage dialogue with the Company, the regulatory agencies, and other Utah parties, we propose the formation of a working group led by the Division of Public Utilities to evaluate this proposal along with others that may arise as potential solutions to the underlying tension between timeliness, accuracy, and public involvement.<sup>28</sup>

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<sup>27</sup> Guidelines, *supra* note 3, at 41 (Procedural Issue 8).

<sup>28</sup> Requesting that the Division head a working group has precedence in IRP process development. During the Guidelines development the Commission requested that the Division of Public Utilities lead a

If we are correct and the problem is structural, declining to acknowledge an IRP or imposing additional requirements will not resolve the issue of either ongoing delays or issues with accuracy and a lack of public involvement. Structural redress is needed. We hope to work with others to develop a workable solution for Utah.

**IV. WRA RECOMMENDS THE PSC FORMALLY CONSIDER ACKNOWLEDGMENT OF THE 2023 IRP UPDATE DUE MARCH 31.**

Several elements support the Commission considering formal Acknowledgment of the 2023 IRP Update. First, as mentioned *infra* at 10-11, the 2023 IRP had many errors and discrepancies in the results provided. We would expect that in the time that has passed, the model will have been refined and errors addressed, so that the IRP Update’s modeling results should make more sense than some of the results we examined.

Second, recent events have occurred that could substantively change elements of the 2023 Preferred Portfolio. On July 27, the 10<sup>th</sup> Circuit Court of Appeals granted the State of Utah’s request for a stay of the Environmental Protection Agency’s Ozone Transport Rule. The federal implementation plan would limit ozone emissions from the Hunter and Huntington coal plants. For the 2023 IRP, PacifiCorp had constrained dispatch from these units beginning in 2026 to reflect the federal ozone limitations.

On September 29, PacifiCorp suspended its 2022 All-Source RFP that had solicited resources for the 2026-2027 time period. Proxy resources from this RFP had been included in the Preferred Portfolio.<sup>29</sup>

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taskforce to “identify and analyze relevant integrated resource planning issues that would require explicit Commission decision.” Guidelines, *supra* note 3, at 1-3.

<sup>29</sup> “The 2023 IRP Preferred Portfolio includes near-term proxy resource selections that align with recent transmission cluster studies, and the 2022AS RFP is currently soliciting and evaluating resources fulfill these needs.” *2023 IRP Volume 1*, *supra* note 1, at 10.

Utah statute requires PacifiCorp to file “any action plan developed as part of [its] integrated resource plan to enable the commission to review and provide guidance to [it].”<sup>30</sup> As previously discussed, typically an IRP Update is filed for informational purposes, and while the Commission may request comments, in the past it has taken no action. For the upcoming 2023 IRP Update, WRA requests the Commission consider a formal process. In determining whether PacifiCorp has substantially complied with Guideline 3, it would evaluate the 2023 IRP and its Update as a whole, including how the Company incorporates feedback submitted in this proceeding in developing the 2023 IRP Update.

While we recognize that utility planning is an ongoing process, we also believe issues with this particular IRP warrant an extension of the 2023 IRP process to include the IRP Update. At the very least, intervenors in this docket should have access to working papers and the ability to submit further discovery upon submission of the IRP Update.

## **V. CONCLUSION**

WRA supports PacifiCorp’s planning efforts and appreciates this opportunity to provide comments to the PSC.

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<sup>30</sup> Utah Code Ann. § 54-17-301(1) (2022).



Dated this 12<sup>th</sup> day of December 2023.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES



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# EXHIBIT 1

**Table 1**  
**PacifiCorp Integrated Resource Planning:  
Extensions, Delays, and Acknowledgement**

<b>Docket No.</b>	<b>Regarding</b>	<b>Initially Due</b>	<b>Extensions</b>	<b>Delay</b>	<b>IRP Filed</b>	<b>Order Issued</b>	<b>Acknowledgement</b>
90-2035-01	In the Matter of Analysis of an Integrated Resource Plan for PacifiCorp					June 18, 1992	<u>Report and Order on Standards and Guidelines</u>
90-2035-01	RAMPP 1				1989	May 25, 1990	Approach Reasonable
90-2035-01	RAMPP 2	Unknown	Unknown	Unknown	May 1992	June 1, 1993	IRP Acknowledged
94-2035-05	RAMPP 3	Unknown	No	<b>Ontime</b>	April 14, 1994	March 7, 1995	Action Plan Not Acknowledged
96-2035-01	RAMPP 4	Unknown	No	<b>Ontime</b>	Nov. 22, 1995	Jan. 13,1997	IRP Acknowledged
97-2035-06	RAMPP 5	Unknown	Unknown	Unclear	Dec. 17, 1997	April 21, 1999	IRP Not Acknowledged

98-2035-05	RAMPP 6	December 31,1999	One-year extension to December 31, 2000; Approved  Three-month extension to March 2000: Approved  Filing delayed an additional 16 months	Delay of 2.5 Years	July 11, 2001	Feb. 28,2002	IRP Not Acknowledged
03-2035-01	IRP 2003	Expected by Dec. 31, 2002	No	Unclear (24 days)	Jan 24, 2003	May 30,2003	<b>IRP Acknowledged</b>
05-2035-01	IRP 2004	Expected by Dec. 31, 2004	No	Unclear (20 days)	Jan 20, 2005	July 21, 2005	Action Plan Not Acknowledged
07-2035-01	IRP 2006 Later renamed IRP 2007	Expected by Dec. 31, 2006	Request for 3-month extension to March 31, 2007 No Action  Filing delayed an additional 2 months	Five-Month Delay  Errata Filing 3 Months Later	May 31, 2007 IRP Filed  August 17, 2007 Errata filing	Feb. 6, 2008	IRP Not Acknowledged

09-2035-01	IRP 2008	Expected by Dec 31, 2008	Request for extension to March 31, 2009 No Action  Negotiated delay of Draft IRP to April 8, 2009  Company notified Commission that it would file Final IRP May 29, 2009  Commission ordered Draft IRP to be filed April 8, 2009	Five-Month Delay	April 8, 2009 Draft IRP  May 28, 2009 Final IRP	April 1, 2010	<b>IRP Acknowledged</b>  Going forward, March 31 filing date directed by Order
11-2035-01	IRP 2011	March 31, 2011		<b>Partial Filing Ontime</b>  Addendum filed 3 months later	March 31, 2011 Partial Filing  June 27, 2011 Addendum filed	March 22, 2012	IRP Not Acknowledged
13-2035-01	IRP 2013	March 31, 2013	Request for extension to April 30, 2013, Approved	One-Month Delay	April 30, 2013,	Jan. 2, 2014	<b>IRP Acknowledged</b>

15-035-04	IRP 2015	March 31, 2015		<b>Ontime</b>	March 31, 2015	Jan. 8, 2016	<b>IRP Acknowledged</b>
17-035-16	IRP 2017	March 31, 2017	Request for extension to April 4, 2017, Approved	Four-Day Delay	April 4, 2017 IRP Filed April 11, 2017 Supplemental Filing	March 2, 2018	Substantially Complies, but not with Guideline 3 – Public Participation
19-035-02	IRP 2019	April 1, 2019 *	Request for extension to August 1, 2019; Approved Request for extension to Oct. 18, 2019; Approved	Six and One Half-Month Delay	Oct. 18, 2019 IRP Filed Oct. 25, 2019, Supplemental Filing Nov. 8, 2019 Supplemental Filing	May 13, 2020	Substantially Complies; Action Plan Not Acknowledged
21-035-09	IRP 2021	March 31, 2021	Request for extension to Sept. 1, 2021; Approved	Five-Month Delay	Sept. 1, 2021 Sept 15, 2021 Errata Filing	June 2, 2022	IRP Not Acknowledged

23-035-10	IRP 2023	March 31, 2023	Request for extension to May 31, 2023 Approved	Two-Month Delay	March 31, 2021 Preliminary IRP  April 17, 2021 Supporting Documentation  May 1, 2021, Confidential Information  May 31, 2023, Final IRP	TBD	TBD
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# EXHIBIT 2



In the Matter of PACIFICORP'S )  
Integrated Resource Plan, RAMPP6 )

DOCKET NO. 98-2035-05  
INTERIM ORDER

ISSUED: February 11, 1999

SYNOPSIS

Good cause appearing, the Commission ordered a one-year extension for filing the report.

By The Commission:

PROCEDURAL HISTORY

On November 12, 1998, The Division of Public Utilities, Utah Department of Commerce (DPU), initiated this matter by recommending, via memorandum, approval of a one-year extension for filing the RAMPP6 report. PACIFICORP ("the Company") filed such a request November 27, 1998. Having considered the matter, the Commission enters the following Findings of Fact, Conclusions of Law, and the interim Order based thereon.

FINDINGS OF FACT

1. Heretofore, the Company has submitted its Integrated Resource Plan (IRP) entitled Resource and Market Planning Program (RAMPP) on a biennial basis as required by our June 18, 1992 Order in Docket No. 90-2035-01. The last IRP (RAMPP5) was filed in December of 1997 and RAMPP6 is due at the end of 1999. The Company's request, if granted, would extend the RAMPP6 due date to the end of the year 2000.
2. The Company's request listed two primary reasons for the extension. An additional year will provide the Company and all interested parties a better understanding of the legislative and institutional changes that are occurring in the industry. Secondly, the extension will provide more time for the Company to address the weaknesses identified in RAMPP5.
3. On October 2, 1998, the Company held a meeting in Portland to discuss the timing and scope of RAMPP6. During the meeting, the Company broached the subject of a possible extension. No explicit objection was made from representatives present, which included members of Utah's regulatory agencies. During this meeting, several topics were identified that would be discussed during the additional year of study, they include but are not limited to the following:
  - Development of a new load forecast
  - What constitutes the load incorporated in an IRP
  - Appropriate time horizon
  - Alternative scenario risk analysis

- Appropriate level of demand side acquisition
- Fuel price forecasts and impacts
- Wholesale price forecasts and impacts
- Impacts of carbon taxes
- Alignment of generation engineering lives and planning lives
- Analysis of impact of life extending capital additions
- Impact of BPA subscription power
- Reduction in industrial load due to direct access
- Transmission system operation changes (ISO) and upgrades
- Potential changes to IRP rules

4. It was felt by the group that these topics could not be analyzed in sufficient detail under the 1999 deadline.

5. In a November, 6, 1998 memorandum, the Division of Public Utilities recommended to the Commission that it approve the pending request for an extension if the Company agrees to incorporate the following improvements:

① consistent assumptions pertaining to depreciation of new and existing resource lives for RAMPP study and the Company's approved depreciation study

② load forecasts that are consistent with the current experience of load growth in Utah

③ significant risk analysis on scenarios

④ inclusion of Commission ordered changes to RAMPP5 and RAMPP6.

#### DISCUSSION

Having considered DPU's memorandum and the conditions for approval set forth therein, we agree that the extension should be contingent upon those conditions. Petitioner's request includes a list of topics to be explored during the year of extension, and we expect these topics will be explored and included in your report as appropriate. We further note that RAMPP5 indicates that there is no pressing need for new generation until 2010. An extension of the deadline for the submittal of RAMPP6 until December 2000 therefore appears appropriate.

#### CONCLUSIONS OF LAW

The extension of time to file the RAMPP6 report should be granted, subject to the conditions discussed above.

#### ORDER

NOW, THEREFORE, IT IS HEREBY ORDERED that:

PACIFICORP is accorded an extension to December 31, 2000, in which to file its RAMPP6 report, subject to the conditions discussed in the Findings of Fact and Conclusions of Law above.

DATED at Salt Lake City, Utah, this 11th day of February, 1999.

/s/ Stephen F. Mecham, Chairman

(SEAL) /s/ Constance B. White, Commissioner

/s/ Clark D. Jones, Commissioner

Attest:

/s/ Julie Orchard  
Commission Secretary

MEMORANDUM


WRA Exhibit 2  
Docket No. 23-035-10  
Referencing Docket  
No. 98-2035-05  
Page 4 of 56

To: Brian K. Hedman  
Manager, Integrated Resource Planning

From: The Utah Public Service Commission

Re: Response to Request for 3-month extension of RAMPP 6, Integrated Resource Plan

Date: January 25, 2001

On December 20, 2000, the Utah Public Service Commission ("Commission") received a request from PacifiCorp (the "Company") for a 3-month extension on the Company's biennial integrated resource planning report (RAMPP) in addition to the one-year extension previously granted by this Commission in its Interim Order dated February 11, 1999, in Docket No. 98-2035-05. The Company states in its request that resource constraints coupled with an unprecedented pace of activity last fall, associated with a host of issues currently facing the Company, have prevented it from adhering to the time-line envisioned in the original request for an extension. 

Due to the aforementioned limitations, the Commission hereby grants a 3-month extension to the Company, also allowing for more discussion to diminish the uncertainty surrounding the issues that have faced the RAMPP Advisory Group in its past meetings.

The Commission will anticipate the final RAMPP 6 report in March. Any additional concerns or questions concerning the RAMPP 6 report in relation to the Commission can be directed to Julie Orchard, Commission Secretary, at (801) 530-6713.

cc: Parties of Record

201 South Main, Suite 2300  
Salt Lake City, Utah 84111



***VIA ELECTRONIC FILING  
AND OVERNIGHT DELIVERY***

January 17, 2007

Julie P. Orchard  
Commission Secretary  
Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

**Re: Request for Extension of Time to File 2006 Integrated Resource Plan**

Dear Ms. Orchard:

In order to allow sufficient time for the process necessary to produce its 2006 Integrated Resource Plan (“IRP”), Rocky Mountain Power (“the Company”), a division of PacifiCorp, hereby respectfully requests an extension of the filing date to March 31, 2007. An electronic copy of this filing will be provided to [mlivingston@utah.gov](mailto:mlivingston@utah.gov).

Pursuant to the Report and Order on Standards and Guidelines, issued June 18, 1992 in Docket No. 90-2035-01, Rocky Mountain Power files its IRP every two years. PacifiCorp last filed an IRP with the Commission on January 20, 2005. The Company’s ability to complete and file its 2006 IRP has been impacted by a number of issues.

Rocky Mountain Power was created as a division of PacifiCorp subsequent to the acquisition of PacifiCorp by MidAmerican Energy Holdings Company (“MEHC”), approved by the Commission on March 14, 2006 in Docket No. 05-035-54. The Company continues the process of integration into the MEHC group, and the 2006 IRP will be the first filed under MEHC ownership. In addition, PacifiCorp is currently seeking approval in Utah and Oregon of its 2012 Request for Proposal to procure additional long-term resources. Neither state has yet approved the draft RFP. The Company intends to take information gained from the above events into consideration in its IRP to make the process as meaningful as possible. As such, the Company will not be prepared to file its IRP prior to March 31, 2007.

If you have questions please contact Dave Taylor, Utah Regulatory Affairs Manager, at (801) 220-2923.

Sincerely,

Jeffrey K. Larsen  
Vice President, Regulation





*Yvonne R. Hogle*  
*Senior Counsel*  
*One Utah Center*  
*201 S. Main Street, Suite 2300*  
*Salt Lake City, UT 84111*  
*801.220.4050*  
*801.220.3299 Fax*

March 19, 2009

*VIA ELECTRONIC FILING*

Public Service Commission of Utah  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114

Attn: Julie P. Orchard,  
Commission Secretary

**RE: Docket No. 07-2035-01, Order No. 90-2035-01  
PacifiCorp's 2007 Integrated Resource Plan (IRP)**

Dear Ms. Orchard:

In an informational filing, specifically a letter to the Public Service Commission of Utah (Commission) dated June 11, 2008, and PacifiCorp's 2007 IRP Update, PacifiCorp requested that the Company file its next IRP March 31, 2009, and that the filing date be permanently modified to March 31 of each odd-numbered year. Given that the letter and the 2007 IRP Update were filed for informational purposes only, and that no action was required or taken by the Commission, consistent with *Utah Admin. Code R 746-100-3.A.(1)(b)*, PacifiCorp deems it appropriate to notify the Commission of its change in schedule pertaining to the filing of its IRP.

PacifiCorp will now be filing its next IRP (2008 IRP) May 29, 2009. The circumstances that led to the change in schedule are (1) that PacifiCorp needs additional time to finalize its 2008 IRP, and (2) to provide sufficient time to parties to review the 2008 IRP before filing it with the Commission. During a discussion with the Division of Public Utilities (Division) in which PacifiCorp indicated that it planned to file the 2008 IRP at the end of April 2009, the Division indicated that it needed a minimum of 30 days to review it before PacifiCorp files it with the Commission. In deference to the Division's request, PacifiCorp has set May 29, 2009 as the date in which it will file its 2008 IRP. The Company also intends to file the 2008 IRP with other state commissions on that date. With the exception of this year, PacifiCorp still intends to keep March 31 of each odd-numbered year as the permanent filing date for its IRP.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to the following:

By E-mail: [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

If there are informal inquiries concerning this filing, please contact Pete Warnken, Manager Integrated Resource Planning at (503) 813-5518 or Dave Taylor, Utah Regulatory Affairs Manager at (801) 220-2923.

Sincerely,

Yvonne R. Hogle  
Senior Counsel

cc: Service List 07-2035-01

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

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In the Matter of the Acknowledgment of PacifiCorp's Integrated Resource Plan.	) ) ) ) ) )	<u>DOCKET NO. 09-2035-01</u>  <u>ORDER AND NOTICE OF</u> <u>SCHEDULING CONFERENCE</u>
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ISSUED: April 7, 2009

By the Commission:

This Docket was initiated on March 19, 2009, when Rocky Mountain Power, acting for PacifiCorp ("Company"), notified the Public Service Commission of Utah ("Commission") that the Company planned to file its next Integrated Resource Plan ("IRP") on May 29, 2009. The Commission issued an Action Request to the Utah Division of Public Utilities ("Division"), regarding this change in the expected filing date. The Division responded to the Action Request on March 25, 2009, and the Utah Committee of Consumer Services ("Committee") also filed comments on the proposed filing date and other issues on March 31, 2009.

**BACKGROUND**

Beginning with a letter dated June 11, 2008, accompanying the Company's 2007 IRP update filed in Docket No. 07-2035-01,<sup>1</sup> the Company requested that its next IRP be filed

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<sup>1</sup>Docket No. 07-2035-01, "In the Matter of the PacifiCorp 2006 Integrated Resource Plan."



March 31, 2009, and that the filing date for future IRPs be permanently changed to March 31 of each odd-numbered year.

On February 13, 2009, the Company provided a partial Draft 2008 IRP to participants in the IRP public process and indicated the remaining information would be provided during the week of February 23, 2009. The Company further requested comments from interested participants by March 12, 2009.

Due to changed circumstances, on March 6, 2009, PacifiCorp informed interested participants of a revised 2008 IRP schedule as follows: March 20, 2009, revised Draft 2008 IRP completed; March 31, 2009, IRP filed with the Washington Commission and IRP distributed for public review; April 15, 2009, public comments due to the Company; and April 30, 2009, IRP filed with other state Commissions. On March 11, 2009, the Company hosted a teleconference to discuss this proposed schedule with interested participants.

On March 19, 2009, a teleconference of Utah participants in the IRP process and Company representatives was held to discuss the Company's schedule as proposed on March 11, 2009, and for Utah participants to provide input to the Company on this schedule. Also on March 19, 2009, the Company filed a letter with the Commission indicating it will file the 2008 IRP on May 29, 2009. The Company specified the following two circumstances led to the change in schedule: first, the need for additional time to finalize its 2008 IRP and second, to provide sufficient time for parties to review the Draft 2008 IRP prior to its filing with the Commission.

## **COMMENTS OF THE PARTIES**

DOCKET NO. 09-2035-01

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Both the Division and the Committee oppose the proposed filing date and explain it is yet another delay to the expected IRP schedule. As this iteration of the IRP has progressed, the Utah parties had developed expectations of an earlier filing date based on the IRP guidelines and previous Company statements at various stages in the process. Specifically, both the Division and Committee note the date has progressively slipped from an anticipated March 31, 2009 filing date, to the currently proposed May 29, 2009, date.

In its March 25, 2009, memo the Division concludes the Company's March 19, 2009, proposed schedule is unreasonable because the information contained in the IRP would be significantly outdated by the time an acknowledgment order could be issued. Further, the Division also opposes the proposal that the future filing dates (for the IRP and IRP Updates) should be March 31. The Division explains that a January 1 filing date would provide the information it needed in a more timely manner. The Division requests the Commission order the Company to file its current IRP in Utah on April 6, 2009, as the Company had already stated it would be circulating a draft version of the IRP among the states by that date. The Division also requests the Commission hold a scheduling conference which would determine a schedule for the parties to provide comments on the IRP to the Commission. The Division suggests that at a minimum parties be allowed 30 days to provide comments.

In its comments on the proposed filing date the Committee supports an IRP filing date in Utah of April 8, 2009, for similar reasons as the Division supports April 6, 2009. The Committee states that while it generally concurs with the Division's analysis and concerns, it believes the Division's recommendation of a 30 day comment period provides insufficient time

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to conduct meaningful analysis, therefore the Committee recommends the Commission provide between 60 and 90 days for comments and analysis. The Committee also enumerates its concerns regarding the effects the on-going delays in receiving the IRP information have had, and could have, on current and future dockets.

On April 2, 2009, the Company filed reply comments with the Commission opposing the recommendations of the Division and Committee. Specifically, the Company is concerned the draft of the 2008 IRP it will circulate to IRP participants, will be incomplete, will not have gone through senior management approval and will not benefit from parties' comments. The Company is concerned the status of "final" 2008 IRP acknowledgment is not clear and may be administratively burdensome and result in further delay. Additionally, the Company is concerned the process recommended by the Division and Committee would effectively mean abandoning a significant portion of the Company's efforts to align the IRP and its business plan.

**DISCUSSION, FINDINGS AND CONCLUSIONS**

We concur with the concerns expressed by both the Division and the Committee regarding the importance of receiving IRP information in a timely manner. We further concur that starting a formal review of the IRP sooner rather than later will provide useful information to regulators and interested parties, on a going forward basis, as the Company formulates plans to address the significant resource deficits projected in the future. Therefore we adopt the Division's and Committee's recommendation regarding the filing date for this IRP and order the Company to file its April 2008 Draft IRP in Utah on the date the Company plans to circulate this document to other states, which we understand is April 8, 2009. We acknowledge the

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Company's concerns and will work toward a process to address the Company's issues and the additional information that will need to be filed for final acknowledgment. We will convene a scheduling conference on Tuesday, April 14, 2009, to determine a schedule and process for comments to the Commission and other issues raised by the parties.

**ORDER**

NOW, THEREFORE, IT IS HEREBY ORDERED, that:

1. PacifiCorp shall file its April 2008 Draft Integrated Resource Plan in Utah on April 8, 2009.

2. Notice is hereby given that a Scheduling Conference in the above entitled matter will be conducted by the Public Service Commission of Utah on **Tuesday, April 14, 2009, either at 10:30 a.m., or directly following the Scheduling Conference in Docket No. 09-035-15, in the Fourth Floor Room 401,** Heber M. Wells State Office building, 160 East 300 South, Salt Lake City, Utah.

Individuals wishing to participate by telephone should contact the Public Service Commission two days in advance by calling (801) 530-6716 or call toll-free 1-866-PSC-UTAH (1-866-772-8824). Participants attending by telephone should then call the Public Service Commission five minutes prior to the conference to ensure participation.

In compliance with the Americans with Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) during any

DOCKET NO. 09-2035-01

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proceeding should notify Julie Orchard, Commission Secretary, at 160 East 300 South, Salt Lake City, Utah 84111, (801) 530-6716, at least three working days prior to the hearing.

DATED at Salt Lake City, Utah, this 7<sup>th</sup> day of April, 2009.

/s/ Ted Boyer, Cha

Attest:

/s/ Julie Orchard  
Commission Secretary  
G#61518



*Yvonne R. Hogle*  
*Senior Counsel*  
*201 S. Main Street, Suite 2300*  
*Salt Lake City, UT 84111*  
*801-220-4050 Office*  
*801-220-3299 Fax*  
*yvonne.hogle@pacificorp.com*

January 8, 2013

Public Service Commission of Utah  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114

Attn: Gary Widerburg  
Commission Secretary

**RE: PacifiCorp's 2013 Integrated Resource Plan (IRP) – Request for Filing Extension**

Dear Mr. Widerburg:

PacifiCorp is filing a request for extension of the filing of its 2013 IRP due to recent actions by the U.S. Environmental Protection Agency (EPA) that are beyond the company's control as further described below.

The EPA's proposed action on the Arizona Regional Haze State Implementation Plan (SIP) was published in the Federal Register on July 20, 2012. While the Arizona Regional Haze SIP concluded that the low-nitrogen oxide burners at PacifiCorp's Cholla Unit 4 were sufficient to meet the Best Available Retrofit Technology requirements under the Clean Air Act, the July 20, 2012, EPA's proposal required the installation of selective catalytic reduction at an emission rate of 0.05 pounds per million British thermal unit for Cholla Unit 4. On December 5, 2012, the EPA approved in part and disapproved in part Arizona's Regional Haze SIP, revising the proposed emission limits for Cholla Unit 4 to include emissions averaging at a rate of 0.055 pounds per million British thermal unit with Cholla Units 2 and 3 (which are owned and operated by Arizona Public Service). The Cholla Unit 4 emissions control requirements and associated assumptions will now be captured in PacifiCorp's 2013 IRP base case modeling runs.

In Wyoming, pursuant to a Consent Decree entered by the United States District Court for the District of Colorado (Court) on September 27, 2011 (Dkt. No. 67), the EPA was required to take final action on the Wyoming Regional Haze SIP by October 15, 2012. That Consent Decree deadline was moved to December 14, 2012, by EPA with agreement of WildEarth Guardians, party to the Consent Decree. On December 10, 2012, the EPA filed an unopposed motion to again modify the Consent Decree deadlines for taking action on the Wyoming Regional Haze SIP. EPA's motion sought to modify the Consent Decree to allow it to re-propose, on or before March 29, 2013, a rule to govern compliance with Regional Haze implementation plan requirements under the Clean Air Act for the state of Wyoming. On December 13, 2012, the

Court granted EPA's request for an extension. Consistent with EPA's request, EPA now has until March 29, 2013 to re-propose a Regional Haze implementation plan compliance rule and until September 27, 2013 to take final action on the rule. EPA will be evaluating new cost and visibility analyses for several of PacifiCorp's units and will take public comment on the new information.

After revision of the October 15, 2012, deadline for EPA's action and in anticipation of the EPA's revised deadline of December 14, 2012, to take final action on the Wyoming Regional Haze SIP, PacifiCorp suspended the modeling work it was doing in preparation of the 2013 IRP, intending to re-start the modeling once EPA's final action was made available and its impacts were assessed. PacifiCorp was concerned that it would not be an efficient use of time and resources to continue to perform its modeling based on a set of assumptions that could almost immediately change as a result of EPA's final action. PacifiCorp's intention was to incorporate the latest information from EPA's final action into the IRP modeling.

Given that EPA has now requested and received additional time to re-propose action on the Wyoming Regional Haze SIP and that the re-proposed action will not be undertaken in sufficient time to allow PacifiCorp to incorporate those results into its modeling, no modifications to the base case Regional Haze compliance assumptions for Wyoming are necessary, and PacifiCorp will re-initiate its modeling efforts for the 2013 IRP. The Company will include the EPA's previously proposed action on the Wyoming SIP in the 2013 IRP stringent case modeling runs.

PacifiCorp will modify its base case Regional Haze compliance assumptions for the 2013 IRP to incorporate EPA's final actions on the Arizona Regional Haze SIP, to include the addition, by the end of 2017, of a selective catalytic reduction system on Unit 4 of the Cholla plant.

In addition, PacifiCorp will update its forward price curve information so that base case assumptions align with the September 2012 official forward price curve, rather than the June 2012 official price curve, as well as with the most current projections of high and low natural gas prices and coal costs.

Based on the foregoing recent developments, PacifiCorp respectfully requests a one-month extension of the filing of its 2013 IRP for a new filing date of April 30, 2013. This extension will ensure that stakeholders have reasonable time to review the 2013 IRP model results prior to selecting a preferred portfolio and prior to the filing of the 2013 IRP.

PacifiCorp respectfully requests that all formal correspondence and Staff requests regarding this filing be addressed to the following:

By E-mail: [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Public Service Commission of Utah  
January 8, 2013  
Page 3

If there are informal inquiries concerning this filing, please contact Pete Warnken, Manager Integrated Resource Planning at (503) 813-5518 or Dave Taylor, Utah Regulatory Affairs Manager at (801) 220-2923.

Sincerely,

Yvonne R. Hogle  
Senior Counsel

cc: Service List 11-2035-01



CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8<sup>th</sup> day of January, 2012, a true and correct copy of the foregoing was served upon the following as indicated below:

By U.S. Mail:

Cherise Udell  
Utah Moms for Clean Air  
P.O. Box 58446  
Salt Lake City, UT 84158-0446

By Electronic-Mail:

Patricia Schmid  
Assistant Attorney General  
Utah Division of Public Utilities  
160 East 300 South, 5<sup>th</sup> Floor  
Salt Lake City, UT 84111  
[pschmid@utah.gov](mailto:pschmid@utah.gov)

Paul Proctor  
Assistant Attorney General  
Utah Office of Consumer Services  
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Salt Lake City, UT 84111  
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William Powell  
Dennis Miller  
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Lakewood, CO 80226  
[cox@interwest.org](mailto:cox@interwest.org)

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- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

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In the Matter of PacifiCorp's 2013 )  
Integrated Resource Plan ) DOCKET NO. 13-2035-01  
)  
) ORDER GRANTING  
) EXTENSION OF TIME  
)  
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ISSUED: February 12, 2013

By The Commission:

This matter is before the Commission on PacifiCorp's ("Company") January 8, 2013 request for an extension of time to file its 2013 Integrated Resource Plan (IRP). The Company requests that the filing deadline be extended to April 30, 2013.

The Commission hereby grants the Company's request for an extension of time to April 30, 2013.

DATED at Salt Lake City, Utah, this 12<sup>th</sup> day of February, 2013.

/s/ Gary L. Widerburg  
Commission Secretary  
D#241725

DOCKET NO. 13-2035-01

- 2 -

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12<sup>th</sup> day of February, 2013, a true and correct copy of the foregoing ORDER GRANTING EXTENSION OF TIME, was delivered upon the following as indicated below:

By Electronic Mail:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com))  
PacifiCorp

By Hand-Delivery:

Division of Public Utilities  
160 East 300 South, 4<sup>th</sup> Floor  
Salt Lake City, Utah 84111

Office of Consumer Services  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, Utah 84111

---

Administrative Assistant



*Jeffrey K. Larsen*  
*Vice President, Regulation*  
*1407 West North Temple, Suite 310*  
*Salt Lake City, Utah 84116*

March 20, 2017

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Administrator

**Re: 2017 Integrated Resource Plan – Request for Filing Extension**

Pursuant to the Public Service Commission of Utah’s Order in Docket No. 09-2035-01, PacifiCorp, d/b/a Rocky Mountain Power requests a short extension to file the 2017 Integrated Resource Plan (the “2017 IRP”). Rocky Mountain Power is working to finalize the 2017 IRP and anticipates that it will need additional time to complete its preparation and respectfully requests a 4 calendar day extension from March 31, 2017 to April 4, 2017.

Questions regarding this filing may be directed to Bob Lively at (801) 220-4052.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jeffrey K. Larsen".

Jeffrey K. Larsen  
Vice President, Regulation

cc: Division of Public Utilities  
Office of Consumer Services

**CERTIFICATE OF SERVICE**

**Docket No. 17-035-16**

I hereby certify that on this 20th day of March 2017, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Cheryl Murray - [cmurray@utah.gov](mailto:cmurray@utah.gov)

Michele Beck - [mbeck@utah.gov](mailto:mbeck@utah.gov)

**Division of Public Utilities**

Chris Parker - [ChrisParker@utah.gov](mailto:ChrisParker@utah.gov)

William Powell - [wpowell@utah.gov](mailto:wpowell@utah.gov)

Erika Tedder - [etedder@utah.gov](mailto:etedder@utah.gov)

  
\_\_\_\_\_  
Jennifer Angell  
Supervisor, Regulatory Operations

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

In the Matter of PacifiCorp's 2017 Integrated Resource Plan	<u>DOCKET NO. 17-035-16</u>  <u>ORDER GRANTING</u> <u>EXTENSION OF TIME</u>
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ISSUED: March 21, 2017

This matter is before the Public Service Commission of Utah (PSC) on PacifiCorp's, doing business in Utah as Rocky Mountain Power, March 20, 2017 request for an extension of time, from March 31, 2017<sup>1</sup> to April 4, 2017, to file its 2017 Integrated Resource Plan (IRP).

We find the extension of time requested by PacifiCorp to file its 2017 IRP is reasonable, and because of the modest length of the requested extension we do not see a need to solicit comments. Accordingly, we grant PacifiCorp's request.

DATED at Salt Lake City, Utah, March 21, 2017.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg  
Commission Secretary  
DW#292344

<sup>1</sup> The PSC approved an IRP filing date of March 31 of each odd year in Docket No. 09-2035-01. See *In the Matter of the Acknowledgment of PacifiCorp's Integrated Resource Plan*, Docket No. 09-2035-01, April 1, 2010 Report and Order at 57.

DOCKET NO. 17-035-16

- 2 -

CERTIFICATE OF SERVICE

I CERTIFY that on March 21, 2017, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Electronic Mail:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com))  
PacifiCorp

Robert C. Lively ([bob.lively@pacificorp.com](mailto:bob.lively@pacificorp.com))  
Rocky Mountain Power

Patricia Schmid ([pschmid@utah.gov](mailto:pschmid@utah.gov))  
Justin Jetter ([jjetter@utah.gov](mailto:jjetter@utah.gov))  
Robert Moore ([rmoore@utah.gov](mailto:rmoore@utah.gov))  
Steven Snarr ([ssnarr@utah.gov](mailto:ssnarr@utah.gov))  
Assistant Utah Attorneys General

Erika Tedder ([etedder@utah.gov](mailto:etedder@utah.gov))  
Division of Public Utilities

By Hand Delivery:

Office of Consumer Services  
160 East 300 South, 2<sup>nd</sup> Floor  
Salt Lake City, Utah 84111

---

Administrative Assistant





*Yvonne R. Hogle*  
*Assistant General Counsel*  
*1407 West North Temple, Suite 320*  
*Salt Lake City, UT 84116*  
*801.220.4050*  
*801.220.3299 Fax*

January 28, 2019

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114

Attn: Gary Widerburg  
Commission Secretary

**RE: PacifiCorp's 2019 Integrated Resource Plan**

Dear Mr. Widerburg:

PacifiCorp ("PacifiCorp" or the "Company") has been actively and diligently working on its 2019 Integrated Resource Plan ("IRP") through a robust and transparent public-input process with stakeholders that began June 2018 with state-specific meetings followed by all-state public-input meetings July 2018. A link to meeting materials, available studies conducted and stakeholder feedback can be found at: [www.pacificorp.com/es/irp.html](http://www.pacificorp.com/es/irp.html).

PacifiCorp is developing an economic analysis of its coal units that will inform the subsequent portfolio-development phase of the 2019 IRP, including an assessment of regional haze compliance alternatives and a broad range of sensitivity studies. On December 3-4, 2018, PacifiCorp presented preliminary studies on its coal unit economic analysis at an IRP public-input meeting. This analysis identified potential reliability challenges that must be resolved before the coal studies can be completed.

To enable PacifiCorp to complete the necessary analysis to develop a least-cost, least-risk preferred portfolio while allowing sufficient time for stakeholder review and input, additional time is required in the preparation of its 2019 IRP. PacifiCorp respectfully requests an extension of the filing of its 2019 IRP from April 1, 2019,<sup>1</sup> to no later than August 1, 2019.<sup>2</sup> This extension will enable PacifiCorp to complete its economic analysis of coal units, while appropriately accounting for system reliability and necessary additional portfolio analysis. PacifiCorp will continue its robust and transparent stakeholder-input process with additional monthly public-input meetings scheduled up to the extended filing date to ensure stakeholders are kept

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<sup>1</sup> Because March 31, 2019 is a Sunday, the filing of the IRP this year is due April 1, 2019, in accordance with Utah Code Ann. §68-3-7.

<sup>2</sup> The filing date of the Company's IRP was set in Docket No. 09-2035-01, Report and Order, p. 57 (April 1, 2010).

up-to-date regarding the Company's analysis and overall progress. The Company communicated its intent to seek this extension to stakeholders and additional public-input meeting dates during the January 24, 2019 public input meeting.

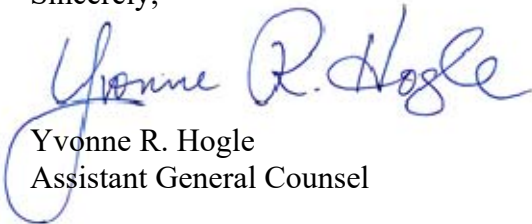
It is respectfully requested that all formal correspondence and requests regarding this filing be addressed to the following:

By E-mail: [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries concerning this filing should be directed to Shay LaBray, Director of Resource Planning, at (503) 813-6176 or Jana Saba, Utah Regulatory Affairs Manager, at (801) 220-2823.

Sincerely,



Yvonne R. Hogle  
Assistant General Counsel

cc: Service List Docket No. 17-035-16

**CERTIFICATE OF SERVICE**

**Docket No. 17-035-16**

I hereby certify that on January 28, 2019, a true and correct copy of the foregoing was served by electronic mail and/or overnight delivery to the following:

**Utah Office of Consumer Services**

Cheryl Murray [cmurray@utah.gov](mailto:cmurray@utah.gov)  
Bela Vastag [bvastag@utah.gov](mailto:bvastag@utah.gov)  
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**National Parks Conservation Association**

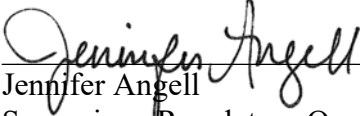
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**Rocky Mountain Power**

Jana Saba  
Yvonne R. Hogle  
Data Request Response Center

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\_\_\_\_\_  
Jennifer Angell  
Supervisor, Regulatory Operations

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

PacifiCorp's 2019 Integrated Resource Plan	<p style="text-align: center;"><u>DOCKET NO. 19-035-02</u></p> <p style="text-align: center;"><u>ORDER AMENDING 2019 IRP FILING DEADLINE AND VACATING REPLY COMMENT FILING DATE</u></p>
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ISSUED: March 12, 2019

On January 28, 2019, PacifiCorp filed a request (“Request”) with the Public Service Commission (“PSC”) for an extension of its 2019 Integrated Resource Plan (“IRP”) filing deadline, from April 1, 2019 to August 1, 2019.<sup>1</sup> PacifiCorp asserts the extension is needed to complete the necessary economic analysis of its coal units that will inform the development of the IRP preferred portfolio. PacifiCorp states the extension will also allow sufficient time for stakeholder review and input.

On January 29, 2019, the PSC issued a Notice and Request for Comments, establishing comment and reply comment deadlines of February 27 and March 13, 2019, respectively. On February 27, 2019, the Division of Public Utilities (“DPU”), the Office of Consumer Services, Western Resource Advocates, and the Interwest Energy Alliance each filed comments recommending the PSC approve the Request. The parties agree an extension is needed to ensure a careful and thorough economic analysis.

Based on the parties’ comments and recommendations, and there being no objection filed, the Request is approved. Based on the absence of objection to PacifiCorp’s Request, we

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<sup>1</sup> The PSC established a March 31 filing date for PacifiCorp’s IRP, (*see In the Matter of the Acknowledgement of PacifiCorp’s Integrated Resource Plan*, Report and Order at 57, issued April 1, 2010, Docket No. 09-2035-01). Because March 31, 2019 falls on a Sunday, the original filing date of the IRP this year is April 1, 2019, pursuant to Utah Code Ann. § 68-3-7.

DOCKET NO. 19-035-02

- 2 -

find it is in the public interest to vacate the March 13, 2019 reply comment deadline in this docket.

ORDER

- 1) The 2019 IRP filing deadline is extended from April 1, 2019 to August 1, 2019. The PSC makes no change to the deadline for filing of future IRPs.
- 2) The reply comment filing date of March 13, 2019 is vacated.

DATED at Salt Lake City, Utah, March 12, 2019.

/s/ Michael J. Hammer  
Presiding Officer

Approved and confirmed March 12, 2019, as the Order of the Public Service Commission of Utah.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg  
PSC Secretary  
DW#306991

DOCKET NO. 19-035-02

- 3 -

CERTIFICATE OF SERVICE

I CERTIFY that on March 12, 2019, a true and correct copy of the foregoing was served upon the following as indicated below:

By E-Mail:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)), ([utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com))  
PacifiCorp

Jana Saba ([jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com))  
Yvonne Hogle ([yvonne.hogle@pacificorp.com](mailto:yvonne.hogle@pacificorp.com))  
Rocky Mountain Power

Patricia Schmid ([pschmid@agutah.gov](mailto:pschmid@agutah.gov))  
Justin Jetter ([jjetter@agutah.gov](mailto:jjetter@agutah.gov))  
Robert Moore ([rmoore@agutah.gov](mailto:rmoore@agutah.gov))  
Steven Snarr ([stevensnarr@agutah.gov](mailto:stevensnarr@agutah.gov))  
Assistant Utah Attorneys General

Erika Tedder ([etedder@utah.gov](mailto:etedder@utah.gov))  
Division of Public Utilities

By Hand-Delivery:

Office of Consumer Services  
160 East 300 South, 2nd Floor  
Salt Lake City, UT 84111

---

Administrative Assistant



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*Salt Lake City, UT 84116*  
*801.220.4050*  
*801.220.3299 Fax*

July 16, 2019

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114

Attn: Gary Widerburg  
Commission Administrator

**RE: Docket No. 19-035-02 - PacifiCorp's 2019 Integrated Resource Plan**

Dear Mr. Widerburg:

On January 28, 2019, Rocky Mountain Power filed a request with the Public Service Commission of Utah (the "Commission") seeking to extend the April 1, 2019 filing date for the Company's 2019 Integrated Resource Plan ("IRP"). The Company identified potential reliability challenges that had to be resolved before the Company's coal studies could be completed. In its request, the Company indicated that it needed additional time to work through the identified challenges. On January 29, 2019, the Commission issued a notice and request for comments, and the Division of Public Utilities, the Office of Consumer Services, Western Resource Advocates, and Interwest Energy Alliance filed comments in support of an extension to ensure a careful and thorough economic analysis. The Commission subsequently granted the extension on March 12, 2019.

While the Company continues to actively and diligently work on its 2019 IRP through a robust and transparent public input process with stakeholders that began as early as June 2018 with state-specific meetings followed by all-state public input meetings starting in July 2018, it is unable to file its 2019 IRP in August 2019 as intended due to a modeling issue that was recently discovered by the IRP modeling team, as set forth below.

2019 IRP Modeling Issue

In the Company's on-going efforts to review and validate model results, the IRP modeling team discovered that coal-cost assumptions for the Jim Bridger units, which drive variable fuel costs, included forward-looking fixed-cost assumptions required to fund mine reclamation. While costs to fund mine reclamation are included in fuel costs as an element of net power costs in rates,



combining these mine-reclamation funding costs in the Jim Bridger coal cost can influence modeled dispatch of the Jim Bridger units. By including a fixed cost (mine-reclamation funding) as a variable cost model input (coal costs), the System Optimizer (“SO”) and Planning and Risk (“PaR”) models can avoid the funding cost for mine reclamation by reducing dispatch of the Jim Bridger units even though these costs are realistically unavoidable.

Historically, the dispatch cost of the Jim Bridger units has been low enough relative to market prices that the coal-cost adder intended to capture the costs to fund mine reclamation has not significantly altered generation levels and, consequently, has not led to a potential understatement of costs to fund mine reclamation. However, base case assumptions adopted in the 2019 IRP for natural gas prices and power prices are relatively low, and the Company confirmed that the Jim Bridger units are reducing dispatch in a manner that understate the cost to fund mine reclamation. Considering that early retirement assumptions for Jim Bridger units vary among cases, mine closure and associated mine reclamation funding assumptions vary by case as well. Consequently, the impact of this issue will vary from one case to the next, which could affect the comparative analysis of the costs and risks of each portfolio that is used to select the preferred portfolio.

#### Plan to Remedy the Modeling Issue

The Company will remedy this modeling issue by changing how it applies mine-reclamation costs in the SO and PaR models by removing the costs to fund mine reclamation from Jim Bridger coal costs while concurrently adding these costs as a fixed cost that will be constant for a given case regardless of unit dispatch. Because this remedy will affect Jim Bridger dispatch, it cannot be accurately calculated as an out-of-model adjustment because a change in dispatch can influence the dispatch and associated operating costs at other generating facilities, market purchases and market sales. Most, if not all, cases will need to be re-run through both modeling tools.

#### 2019 IRP Filing Extension

The Company has spent the last couple of months developing modeling analysis for over 50 different portfolios. For any given market price and carbon dioxide (“CO<sub>2</sub>”) price scenario, the development of system cost and risk metrics requires two SO model runs, three one-year deterministic PaR model runs, and one 20-year stochastic PaR model run. Over the past few months, the Company has been able to complete approximately 10 to 12 cases per week. Considering the need to re-run at least 50 cases, complete sensitivities, allow time for rescheduled public-input meetings, and draft the 2019 IRP document, Rocky Mountain Power is requesting an additional extension, to file the 2019 IRP by October 18, 2019. In the interim, the Company proposes to host additional public-input meetings on September 5-6, 2019, to provide stakeholders an update on modeling progress and results completed at that time and on October 3-4, 2019, to present final modeling results, a draft preferred portfolio, and a draft action plan.

In the process of re-running and finalizing the modeling analysis for the 2019 IRP, the Company will also incorporate updates consistent with feedback and discussion during the June 2019 public-input meeting. Specifically, the model runs will be updated to enable selection of Energy Gateway

South in January 2024 (as a proxy for year-end 2023) with a consistent set of assumptions for cost, interconnection capability, and transfer capability across all cases. The updated model runs will also be configured to enable selection of solar resources in northern Utah.

Request to Commission

To enable the Company to re-run and finalize its analysis for the 2019 IRP, Rocky Mountain Power respectfully requests an extension of the filing of its 2019 IRP from August 1, 2019 to no later than October 18, 2019. The Company communicated its intent to seek this extension to stakeholders on July 15, 2019. The extension will enable the Company to complete its analysis with accurate information. The Company will continue its robust and transparent stakeholder input process by holding two additional public input meetings on September 5-6, 2019 and October 3-4, 2019.

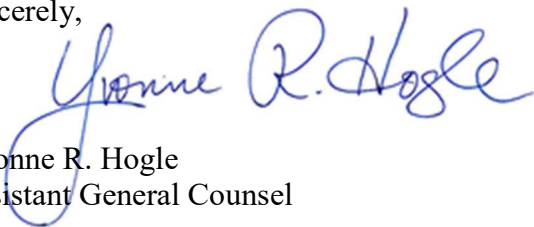
It is respectfully requested that all formal correspondence and requests regarding this filing be addressed to the following:

By E-mail: [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries concerning this filing should be directed to Shay LaBray, Director of Resource Planning at (503) 813-6176 or Jana Saba, Utah Regulatory Affairs Manager at (801) 220-2823.

Sincerely,



Yvonne R. Hogle  
Assistant General Counsel

cc: Service List Docket No. 19-035-02

**CERTIFICATE OF SERVICE**

Docket No. 19-035-02

I hereby certify that on July 16, 2019, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Cheryl Murray [cmurray@utah.gov](mailto:cmurray@utah.gov)

Michele Beck [mbeck@utah.gov](mailto:mbeck@utah.gov)

**Division of Public Utilities**

[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)

Justin Jetter [jjetter@agutah.gov](mailto:jjetter@agutah.gov)

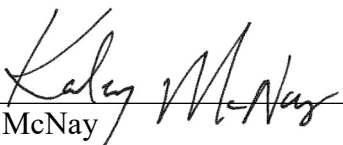
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**Rocky Mountain Power**

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\_\_\_\_\_  
Kaley McNay  
Senior Coordinator, Regulatory Operations

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

PacifiCorp's 2019 Integrated Resource Plan	<u>DOCKET NO. 19-035-02</u> <u>ORDER AMENDING 2019 IRP FILING</u> <u>DEADLINE</u>
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ISSUED: July 29, 2019

On January 28, 2019, Rocky Mountain Power (RMP) filed a request with the Public Service Commission (PSC) for an extension of its 2019 Integrated Resource Plan (“IRP”) filing deadline, from April 1, 2019 to August 1, 2019.<sup>1</sup> The PSC approved RMP’s January 28, 2019 request on March 12, 2019.<sup>2</sup> Subsequently, on July 16, 2019, RMP filed with the PSC a new request (“Request”) for extension of its IRP filing deadline from the previous revised date of August 1, 2019 to no later than October 18, 2019. RMP asserts an extension is needed due to a recently discovered modeling issue which will require RMP to re-run at least 50 cases, at approximately 10-12 cases per week, complete sensitivities, allow time for rescheduled public-input meetings, and to draft the IRP.

On July 17, 2019, the PSC issued a Notice and Request for Comments, establishing a comment deadline of July 25, 2019. The Division of Public Utilities and the Office of Consumer Services filed comments on July 22, 2019 and July 25, 2019, respectively, recommending the PSC approve the Request. The parties agree an extension is needed to ensure a thorough and accurate economic analysis.

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<sup>1</sup> The PSC established a March 31 filing date for RMP’s IRP, (*see In the Matter of the Acknowledgement of PacifiCorp’s Integrated Resource Plan*, Report and Order at 57, issued April 1, 2010, Docket No. 09-2035-01). Because March 31, 2019 falls on a Sunday, the original filing date of the IRP this year is April 1, 2019, pursuant to Utah Code Ann. § 68-3-7.

<sup>2</sup> See Order Amending 2019 IRP Filing Deadline and Vacating Reply Comment Filing Date, issued March 12, 2019.

DOCKET NO. 19-035-02

- 2 -

Based on the parties' comments and recommendations, and there being no objection filed, the Request is approved.

ORDER

- 1) The 2019 IRP filing deadline is extended from August 1, 2019 to no later than October 18, 2019. The PSC makes no change to the deadline for filing of future IRPs.

DATED at Salt Lake City, Utah, July 29, 2019.

/s/ Michael J. Hammer  
Presiding Officer

Approved and confirmed July 29, 2019, as the Order of the Public Service Commission of Utah.

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Jordan A. White, Commissioner

Attest:

/s/ Gary L. Widerburg  
PSC Secretary  
DW#309324

DOCKET NO. 19-035-02

- 3 -

CERTIFICATE OF SERVICE

I CERTIFY that on July 29, 2019, a true and correct copy of the foregoing was served upon the following as indicated below:

By E-Mail:

Data Request Response Center ([datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)), ([utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com))  
PacifiCorp

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Division of Public Utilities

By Hand-Delivery:

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Administrative Assistant



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February 12, 2021

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, Fourth Floor  
160 East 300 South  
Salt Lake City, Utah 84114

Attn: Gary Widerburg  
Commission Administrator

**RE: PacifiCorp's 2021 Integrated Resource Plan**

Dear Mr. Widerburg:

PacifiCorp (“PacifiCorp” or “the Company”) has been diligently working on development of its 2021 Integrated Resource Plan (“IRP”) through a robust, transparent and thorough public-input process. This stakeholder process began in January 2020 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 2020, which addressed a range of topics describing PacifiCorp’s modeling methodology, inputs and assumptions for the 2021 IRP. Agenda items covered topics including, but not limited to: resource cost-and-performance assumptions, model function and overview, load forecast, price-policy assumptions, market price assumptions, and transmission options considered as part of the 2021 IRP. In addition, PacifiCorp has been working since the summer of 2020 to implement new modeling software for the 2021 IRP. To date, PacifiCorp has held 12 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).

Given the current status of the 2021 IRP and the timeline of the on-going 2020 All-Source Request for Proposals (“2020AS RFP”), PacifiCorp respectfully requests an extension to file the 2021 IRP from April 1, 2021 to no later than September 1, 2021. The 2020AS RFP is on schedule to have a final shortlist by June 1, 2021. The extension will ensure that the 2021 IRP is aligned with the results of the 2020AS RFP, which can have implications on the company’s resource plan over both the near and long term. Considering that the current filing schedule of April 1, 2021 would require filing the 2021 IRP just two months ahead of establishing a final shortlist in the 2020AS RFP, PacifiCorp believes it is reasonable to delay filing the 2021 IRP so that the results of the 2020AS RFP can be accounted for in the current planning cycle.

This filing extension will not only ensure the 2021 IRP captures the results of the 2020AS RFP, it will enable PacifiCorp to optimize the modeling functionality of its new system and complete the necessary analysis to develop a least-cost, least-risk preferred portfolio while allowing sufficient time for stakeholder review and input.

PacifiCorp will continue its robust and transparent public-input process with additional monthly public-input meetings to be scheduled up to the extended filing date to provide stakeholders continued opportunity to participate in the 2021 IRP development process focused on the Company's analysis and overall progress. The Company discussed this filing extension request with stakeholders and provided future public-input meetings dates, including scheduling additional public-input meetings up to the proposed file date extension, during its February 10, 2021 public-input meeting.

It is respectfully requested that all formal correspondence and requests regarding this filing be addressed to the following:

By E-mail: [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries concerning this filing should be directed to Shay LaBray, Director of Resource Planning at (503) 813-6176 or Jana Saba, Utah Regulatory Affairs Manager at (801) 220-2823.

Sincerely,



Joelle Steward  
Vice President, Regulation

cc: Service List Docket No. 19-035-02



**CERTIFICATE OF SERVICE**

Docket No. 19-035-02

I hereby certify that on February 12, 2021, a true and correct copy of the foregoing was served by electronic mail to the following:

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**Sierra Club**

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**Rocky Mountain Power**

Data Request Response  
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---

Mary Penfield  
Adviser, Regulatory Operations

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

PacifiCorp's 2021 Integrated Resource Plan	<p style="text-align: center;"><u>DOCKET NO. 21-035-09</u></p> <p style="text-align: center;"><u>ORDER GRANTING REQUEST FOR</u> <u>EXTENSION TO FILE</u></p>
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ISSUED: March 15, 2021

### **Background**

On February 12, 2021, PacifiCorp filed a request (“Request”) with the Public Service Commission (PSC) for an extension to file its 2021 Integrated Resource Plan (IRP). The PSC previously established March 31, 2021 as the 2021 IRP filing deadline. In its Request, PacifiCorp asks that the 2021 IRP filing deadline be extended to September 1, 2021. PacifiCorp explains that its 2020 All-Source Request for Proposals (“2020AS RFP”) is on schedule to reach a final shortlist by June 1, 2021. PacifiCorp asserts it is reasonable to extend the filing date to allow the planning cycle to account for the results of the 2020AS RFP. PacifiCorp also represents it has been working since the summer of 2020 to implement new modeling software for the 2021 IRP. PacifiCorp asserts the extension will “enable [it] to optimize the modeling functionality of [the] new system and complete the necessary analysis to develop a least-cost, least-risk preferred portfolio.”

On February 16, 2021, the PSC issued a Notice and Request for Comments regarding the Request. Subsequently, the Office of Consumer Services (OCS), the Division of Public Utilities (DPU), the Utah Association of Energy Users (UAE), and Sierra Club filed comments. PacifiCorp and UAE later filed reply comments.

The OCS supports RMP's request for an extension. The OCS argues “modeling delays may not allow time for stakeholders to review results, provide input and ask for additional

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analyses before” the 2021 IRP is finalized. The OCS “believes that in this instance, it is more important to allow PacifiCorp time to continue to work toward a more effectual 2021 IRP, including a process that ... allows time for extensive stakeholder feedback, than to meet the current April 1, 2021 filing deadline.”

UAE similarly does not oppose the request for an extension to September 1, 2021, reasoning that a “timely IRP filing would be of limited use and would not allow the amount of feedback on proposed resource portfolios as is typical in an IRP process.” UAE opposes any additional extension beyond September 1, 2021.<sup>1</sup>

Sierra Club maintains that “[a] reasonable delay in the [2021] IRP filing may be justified,” but argues against extending the deadline by five months. Sierra Club proposes an extension to July 15, 2021 would be more appropriate. Sierra Club also advocates that the PSC should add additional modeling and informational requirements to the IRP filing.

The DPU is the only party to submit comments wholly opposed to an extension. It argues, among other things, that PacifiCorp’s 2019 IRP filing was twice delayed and the delays resulted in PacifiCorp failing to file a 2019 IRP Update because it would have been due “mere months after the 2019 IRP itself.” The DPU emphasizes the importance of an established filing date and asserts PacifiCorp has offered inadequate justification for an extension.

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<sup>1</sup> In reply comments, UAE emphasized that incorporating the results of the 2020AS RFP was not, in UAE’s view, a sufficient basis to delay the IRP filing. However, UAE continued to support the extension because “PacifiCorp will not be able to submit an IRP on March 31 that complies with the Standards and Guidelines or that fully incorporates public input and, as such, a delay is merited.”

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In response to these parties' comments, PacifiCorp expresses its appreciation for Sierra Club's support of an extension but urges that an extension until July 15, 2021 would be inadequate to "work through modeling and incorporate the 2020AS RFP final shortlist while allowing for sufficient stakeholder consideration and feedback." PacifiCorp further argues that imposing additional modeling requirements "would only result in more time constraints and further delay."

Regarding the DPU's opposition, PacifiCorp acknowledges the desirability of a predictably timed IRP but argues its request for an extension "is based on factors that are unique and materially impact the ability of [PacifiCorp] to produce an IRP consistent with the guidelines." PacifiCorp represents it simply "cannot meet the March 31 filing date with a document that will fulfill the [PSC's] guidelines or provide meaningful results."

**Discussion, Findings, and Conclusions**

The PSC acknowledges and shares concerns raised by the DPU and other parties regarding a consistent, dependable filing deadline for PacifiCorp's IRP. However, the PSC also recognizes that 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. Here, all parties but the DPU appear to acknowledge that a delay is simply necessary to achieve that objective. Having reviewed the Request, comments, and reply comments, the PSC therefore finds that granting the Request is just, reasonable, and in the public interest. PacifiCorp shall file its 2021 IRP no later than September 1, 2021.

Nevertheless, the PSC shares the DPU's concern that the extension not affect subsequent filing deadlines, specifically PacifiCorp's 2021 IRP Update. Therefore, though the PSC grants

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the Request, the PSC advises PacifiCorp that it should be prepared to timely file its 2021 IRP Update notwithstanding the extension to the filing deadline for its 2021 IRP.

DATED at Salt Lake City, Utah, March 15, 2021.

/s/ Michael J. Hammer  
Presiding Officer

Attest:

/s/ Gary L. Widerburg  
PSC Secretary  
DW#317742

DOCKET NO. 21-035-09

- 5 -

CERTIFICATE OF SERVICE

I CERTIFY that on March 15, 2021, a true and correct copy of the foregoing was delivered upon the following as indicated below:

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Office of Consumer Services

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Administrative Assistant



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.

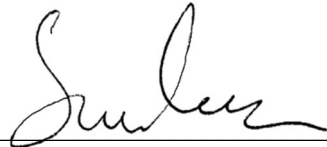
**CERTIFICATE OF SERVICE**

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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\_\_\_\_\_  
Santiago Gutierrez  
Coordinator, Regulatory Operations

- BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH -

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PacifiCorp's 2023 Integrated Resource  
Plan

DOCKET NO. 23-035-10

ORDER GRANTING REQUEST FOR  
EXTENSION TO FILE

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ISSUED: March 28, 2023

**Procedural History and Background**

On March 2, 2023, PacifiCorp filed a request (“Request”) with the Public Service Commission (PSC) for an extension to file its 2023 Integrated Resource Plan (“2023 IRP”). The PSC previously established March 31 of each odd numbered year (the “Filing Date”) as the deadline for PacifiCorp to file its integrated resource plan (IRP).<sup>1</sup> PacifiCorp explains it is currently finalizing model results for the preferred portfolio and will not be able to present the modeling results to stakeholders before the Filing Date. PacifiCorp explains that recent events have required revisions to model inputs and constraints, adding considerable time to the verification of the accuracy of the outputs. This, in turn, jeopardizes stakeholders’ meaningful review before the Filing Date. PacifiCorp states it is prepared to file the 2023 IRP on the Filing Date as required; however, based on the timing of the final IRP results and the preferred portfolio, PacifiCorp is concerned stakeholders will not have been given the opportunity for meaningful review before the 2023 IRP is filed. Accordingly, PacifiCorp

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<sup>1</sup> In Report and Order dated April 1, 2010, in Docket No. 09-2035-01, the PSC established March 31 of “each odd year” as the filing date applicable for PacifiCorp’s IRP filings. “No party opposes [PacifiCorp]’s proposed IRP filing date of March 31 of each odd year. We find it reasonable to have a firm date to enable better scheduling of the process and to ensure timely completion of future IRPs and therefore accept this filing date.” *In the Matter of the Acknowledgment of PacifiCorp’s Integrated Resource Plan*, Docket No. 09-2035-01, Report and Order issued April 1, 2010 at 57.

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requests the PSC grant a two-month extension and proposes a schedule to allow for additional and preliminary stakeholder review before the PSC reviews the 2023 IRP for acknowledgment as follows:

March 31, 2023 – File preliminary 2023 IRP with the PSC on an informational basis with non-confidential information.

April 30, 2023 – Deadline for stakeholders to submit comments and feedback directly to PacifiCorp through the established public input meeting process.

May 31, 2023 – File final 2023 IRP.

On March 3, 2023, the PSC issued a Notice and Request for Comments. Subsequently, on March 9, 2023, Utah Citizens Advocating Renewable Energy and the Utah Environmental Caucus filed comments in support of the Request. On March 10, 2023, Western Resource Advocates, the Division of Public Utilities, and the Office of Consumer Services filed comments in support of the Request. Likewise, on March 10, 2023, Joan Entwistle, a customer of PacifiCorp, dba Rocky Mountain Power in Utah, filed comments in support of the Request.

**Discussion, Findings, and Conclusions**

Though numerous stakeholders express concerns about the IRP process and information they would like to see included in the 2023 IRP, all comments filed in response to the Request support the PSC granting it.

The PSC acknowledges stakeholders' concerns regarding the need for a consistent, dependable filing date for PacifiCorp's IRP and their desire to see certain,

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specific information included. However, the matter presently before the PSC is the Request for an extension of time, and we decline to consider any proposed changes to the IRP process or to impose additional requirements on the utility at this juncture.

The PSC also recognizes the most fundamental objective of this process is to obtain an accurate, complete, and useful IRP that is informed by appropriate and thorough stakeholder input. Here, all stakeholders appear to acknowledge that achieving that objective requires PacifiCorp's requested extension.

Accordingly, having reviewed the Request, the comments, and the unanimous support expressed therein, the PSC finds and concludes that granting the Request is reasonable and in the public interest.

**Order**

The Request is granted, and the following proposed alternative schedule is approved.

- March 31, 2023 – File preliminary 2023 IRP with the PSC on an informational basis with non-confidential information.
- April 30, 2023 – Deadline for stakeholders to submit comments and feedback directly to PacifiCorp through the established public input meeting process.
- May 31, 2023 – File final 2023 IRP.

PacifiCorp shall make every effort to timely respond to requests for information during the March 31 to April 30 comment period.

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DATED at Salt Lake City, Utah, March 28, 2023.

/s/ Michael J. Hammer  
Presiding Officer

Attest:

/s/ Gary L. Widerburg  
PSC Secretary  
DW#327402

DOCKET NO. 23-035-10

- 5 -

CERTIFICATE OF SERVICE

I CERTIFY that on March 28, 2023, a true and correct copy of the foregoing was delivered upon the following as indicated below:

By Email:

Data Request Response Center ([datareq@pacificorp.com](mailto:datareq@pacificorp.com), [utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com))  
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*Office of Consumer Services*

---

Administrative Assistant