

# **EXHIBIT 2**

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Phillip J. Russell  
JAMES DODGE RUSSELL & STEPHENS, P.C.  
10 West Broadway, Suite 400  
Salt Lake City, Utah 84101  
[prussell@jdrsllaw.com](mailto:prussell@jdrsllaw.com) (C)

Don Hendrickson  
ENERGY STRATEGIES, LLC  
111 E. Broadway, Suite 1200  
Salt Lake City, UT 84111  
[dhendrickson@energystrat.com](mailto:dhendrickson@energystrat.com) (C)

RE: UT Docket No. 23-035-10  
UAE 3<sup>rd</sup> Set Data Request (1-10)

Please find enclosed Rocky Mountain Power's Responses to UAE 3<sup>rd</sup> Set Data Requests 3.6-3.7.

If you have any questions, please call me at (801) 220-2823.

Sincerely,

          /s/            
Jana Saba  
Manager, Regulation

Enclosures

Béla Vastag/OCS [bvastag@utah.gov](mailto:bvastag@utah.gov) (C)  
Alex Ware/OCS [aware@utah.gov](mailto:aware@utah.gov) (C)  
Madison Galt/DPU [dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov) [mgalt@utah.gov](mailto:mgalt@utah.gov) (C)  
Sarah Puzzo/UCE [spuzzo@utahcleanenergy.org](mailto:spuzzo@utahcleanenergy.org) (C)  
Logan Mitchell/UCE [logan@utahcleanenergy.org](mailto:logan@utahcleanenergy.org) (C)  
Sarah Wright/UCE [sarah@utahcleanenergy.org](mailto:sarah@utahcleanenergy.org) (C)  
Karl Boothman/WRA [karl.boothman@westernresources.org](mailto:karl.boothman@westernresources.org) (C)  
Sophie Hayes/WRA [sophie.hayes@westernresources.org](mailto:sophie.hayes@westernresources.org) (C)  
Jessica Loeloff/WRA [jessica.loeloff@westernresources.org](mailto:jessica.loeloff@westernresources.org) (C)  
Nancy Kelly/WRA [nkelly@westernresources.org](mailto:nkelly@westernresources.org) (C)

### UAE Data Request 3.6

**Advanced Nuclear Plants** - In response to a stakeholder feedback question regarding risks associated with the addition of nuclear generation plants, the Company stated that “[r]isks related to delay in the nuclear project and cost overruns are a separate consideration of project risk. This has not been analyzed or included in the results. The company intends to mitigate the risk of project delays and cost overruns through contracts yet to be assigned to protect customers and stakeholders”. [See 2023.048. JDRS Law 4-28-23 (with response)]

- (a) Please elaborate on the types of “contracts yet to be assigned” referred to in this response. Does this refer to contracts for the construction for the nuclear plant(s), contracts for market purchases, contracts for other generation resources, some combination of these, or something else?
- (b) Does the Company model risks related to delays or cost overruns with respect to any other generation resources?
  - i. If not, why not?
  - ii. Is it too speculative to include such risks in a risk assessment or is there some other reason?

### Response to UAE Data Request 3.6

- (a) PacifiCorp is currently exploring the potential contract terms and conditions. With specific regard to Natrium, since no commercial arrangements have yet been executed for the purchase of power or the generating resource, PacifiCorp is not currently at risk of any cost overrun or schedule delay.
- (b) A key function of PacifiCorp’s integrated resource plan (IRP) modeling is to identify optimal timing for the acquisition of identified resources. Frequent re-evaluations and the Company’s extensive experience mitigate the need for additional studies regarding established technologies. PacifiCorp did however analyze multiple scenarios comparing the inclusion and exclusion of key projects including Natrium, the Boardman-to-Hemingway (B2H) transmission project and the Energy Gateway South (GWS) transmission project. The B2H and GWS evaluations are relevant here due to these projects’ ties to significant renewable resource capacity. The 2023 IRP also includes acquisition path analysis relevant to key projects in Volume I, Chapter 10 (Action Plan).
  - i. In lieu of modeling delays and cost over runs, the IRP includes contingency costs as part of the proxy resource costs. Projects with long lead times have higher risk of delays or cost overruns.

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The request for proposals (RFP) process, unlike the proxy-based IRP, evaluates bid projects which are contracted with certainty around resource location, size, and cost which would allow measurement around delays or cost overruns.

- ii. The IRP incorporates contingency risks appropriate to long-term planning; please refer to the Company's response to (b) i. above. PacifiCorp is sensitive to delays and timing for all projects and makes adjustments to its long-term planning accordingly.

### **UAE Data Request 3.7**

**Advanced Nuclear Projects** - Figure 1.6 of the IRP filing shows how the Company's plans regarding advanced nuclear reactors have changed from the 2021 IRP to the 2023 IRP. In the 2021 IRP, the Natrium demonstration project was planned to be placed in service by 2028 and to run for approximately 10 years before the next such advanced nuclear reactor was added. This timing allowed for the completion of that project and for the Company to gain significant operational experience with it before committing to additional advanced nuclear projects. The 2023 IRP preferred portfolio does not include the same sort of ramp-up period. Compared to the 2021 IRP, the 2023 IRP delays the start of the first plant to 2030 and advances the remaining two plants to start in 2032 and 2033.

- (a) When would the Company need to commit to construct the first Natrium plant in order for it to achieve COD by summer of 2030?
  - i. What is the estimated time to construct the Natrium plant and to place it in service?
  - ii. Are there any other timing requirements?
- (b) Would the Company need to commit to construct the second and/or third advanced nuclear plant prior to COD of the first plant to achieve a 2032 or 2033 COD?

### **Response to UAE Data Request 3.7**

PacifiCorp is currently exploring the potential terms and conditions.

- (a) The construction of the Natrium demonstration project is a cost-sharing partnership between the United States (U.S.) Department of Energy (DOE) and TerraPower under the DOE Advanced Reactor Demonstration Program (ARDP). The execution of a commercial agreement between TerraPower and PacifiCorp is not a requirement at this time to enable TerraPower's construction and demonstration of the Natrium plant.
  - i. TerraPower currently estimates early non-nuclear construction at the site to begin in 2024 with nuclear construction starting after the Nuclear Regulatory Commission (NRC) issues the Construction Permit. TerraPower currently estimates a plant service date of 2030.
  - ii. While PacifiCorp and TerraPower continue to work together to progress the Natrium facility toward commercial operations by the end of 2030, no commercial agreement has yet been reached. As a result, PacifiCorp cannot provide meaningful tracking and reporting on TerraPower's

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construction and demonstration timing requirements.

- (b) Yes. In order to achieve a commercial operation date (COD) in 2032 and/or 2033, PacifiCorp would need to commit to the incremental nuclear plants prior to achieving COD for the first nuclear plant. PacifiCorp would employ reasonable contractual measures to mitigate risk of cost overruns and schedule delays in the event it commits to such incremental plants.