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July 3, 2025

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

RE: Docket No. 25-035-22, PacifiCorp's 2025 Integrated Resource Plan (IRP)
Comments Regarding RMP's Proposed Technical Conference Agenda

I. INTRODUCTION

On June 24, 2025 Rocky Mountain Power (RMP or the Company) filed a proposed agenda for the technical conference scheduled for July 22, 2025 in this docket. Western Resource Advocates (WRA) appreciates the opportunity to provide feedback on the proposed agenda.

As an initial matter, it is not clear from the proposed agenda whether the Company will use the technical conference to discuss the final IRP preferred portfolio as outlined in Chapter 9 or the draft "Utah" IRP as outlined in Chapter 11 or both. WRA requests that for all relevant agenda items, the Company specify which preferred portfolio and associated action plan are being discussed. To the extent the Company discusses the draft "Utah" IRP, please explain how the final preferred portfolio and associated action plan differ.

II. COMMENTS

A. Please prioritize spending time on agenda item 3, "Integrating the System," and provide examples of the Company's decision-making.

Given that creating and then integrating jurisdictional portfolios are new steps in the resource planning process, WRA requests that the Company plan to spend a significant amount of time on agenda item 3, "Integrating the System," to assist stakeholders in their evaluation of the 2025 IRP. Specifically, please focus on the following:

- Describe, with examples, the process the Company used to integrate the full jurisdictional portfolios into the preferred portfolio. (*See e.g.* pages 220 and 210-211 of Volume I.)
 - Does the Company manually allocate resource shares across jurisdictions? If so, describe the allocation method and at which step in the IRP process these decisions are made.
 - Does the PLEXOS model allocate resources to different jurisdictions? If so, describe the allocation method and at which step in the modeling process this allocation occurs.

- What is the allocation method for resources that can be allocated to any jurisdiction and which resources are eligible to be allocated across all jurisdictions?
- Please explain, for example, how the Company determined the jurisdictional allocation of the Natrium resource selected by the model in 2032.
- As another example, please explain the decisions between the UIWC full jurisdictional portfolio, which calls for utility-scale solar resources in 2028, that led to the preferred portfolio, which assigns utility-scale solar resources to the UIWC jurisdiction starting in 2031. How did the Company make these decisions?
- Describe how the iterative jurisdictional portfolio “phases” were developed, evaluated, and selected for the preferred portfolio integration process. (*See e.g.* page 219 of Volume I.) Please use the UIWC full jurisdictional portfolio as an example. Within this discussion, please describe and provide examples of how the reliability and granularity adjustments were selected and incorporated to develop reliable and cost-effective portfolios. (*See e.g.* pages 192-193 and 184-187 of Volume I.) Please explain how the Company decides which phase of a portfolio development case to move forward in the portfolio selection process.
- Describe the jurisdiction-specific constraints used to develop each of the “full jurisdictional portfolios.” (*See e.g.* page 222 of Volume I.) Please list and explain every unique modeling constraint the Company used to create each full jurisdictional portfolio (UIWC, Oregon, and Washington).

III. CONCLUSION

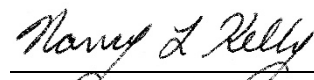
WRA appreciates the opportunity to submit these comments as well as the Company’s willingness to address the foregoing issues at the technical conference.

Sincerely,

WESTERN RESOURCE ADVOCATES

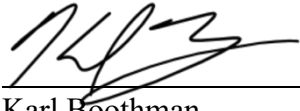


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A handwritten signature in black ink, appearing to read 'K. Boothman', positioned above a horizontal line.

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CERTIFICATE OF SERVICE
Docket No. 25-035-22

I hereby certify that a true and correct copy of the foregoing was served by email this 2nd day of July 2025 on the following:

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*Have signed a Confidential Information Certificate in Docket No. 25-035-22