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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

PacifiCorp's 2025 Integrated Resource Plan	Docket No. 25-035-22
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**COMMENTS OF THE UTAH ASSOCIATION OF ENERGY USERS
REGARDING ROCKY MOUNTAIN POWER'S PROPOSED AGENDA
FOR JULY 22, 2025 TECHNICAL CONFERENCE**

Pursuant to the Scheduling Order, Notice of Technical Conference, and Notice of Public Witness Hearing issued by the Commission on April 16, 2025, the Utah Association of Energy Users ("UAE") hereby files comments in response to the proposed agenda for the July 22, 2025 technical conference filed by Rocky Mountain Power ("RMP" or "Company") on June 24, 2025.

UAE COMMENTS

The Company's proposed agenda identifies categories of topics it proposes to address at the technical conference. In these comments, UAE requests that the Company address certain specific issues. Some of the specific issues identified herein fit squarely within the categories of topics identified in the Company's proposed agenda, while others may not. UAE requests that the Company address the following topics whether or not they fit within the specific categories of topics identified in the Company's proposed agenda.

A. Discussion of Jurisdictional Portfolios and Jurisdictional Share of Preferred Portfolio Resources

The 2025 IRP utilizes the concept of “jurisdictional portfolios,” in which distinct requirements for each jurisdiction are addressed before an integrated portfolio is selected. UAE requests that the Company provide a detailed discussion of the creation of initial jurisdictional portfolios and the integration of these portfolios to create the preferred portfolio. As part of this discussion, UAE requests that the Company discuss the following:

- the distinction between the UIWC Full Jurisdictional Portfolio (Table 9.7) and the UIWC Share portfolio (Table 9.4);
- how the UIWC Full Jurisdictional Portfolio (Table 9.7) is integrated into the 2025 IRP Preferred Portfolio; and
- why resources included in the UIWC Full Jurisdictional Portfolio (Table 9.7) are not included in the UIWC Share portfolio (Table 9.4).

In addition to the foregoing, UAE requests that the Company discuss the significance of each jurisdiction’s resource “share” and the “situs” assignment of resources to a jurisdiction.¹ UAE requests that the Company discuss what “situs” assignment means in the context of resource planning, including how the Company intends to utilize the UIWC “share” of resources in Company processes, filings, tariffs, and analysis in Utah.

UAE further requests that the Company discuss whether jurisdictions that do not receive a “share” of resources in the IRP will participate in procurement decisions regarding those resources.

¹ See, e.g., 2025 IRP at 3 (“Resources identified under each jurisdictional view are brought together into an ‘integrated’ portfolio and assumed to be situs to those jurisdictions in which they were identified as cost effective.”); *id.* at 182 (“Resource additions are considered situs and must be able to serve requirements in their associated jurisdiction.”).

For example, the 2025 IRP states that “only the jurisdictional portfolios that determine the selection of a given resource are eligible to participate in that resource,”² and that “States are only able to impact the disposition of resources in which they have an active share.”³ Please explain what role Utah will play in the procurement of resources for the 2025 IRP Preferred Portfolio and how that role differs for Preferred Portfolio resources identified in the UIWC Share and resources that are included only in the Oregon or Washington Share. In addition, please explain what role, if any, the Full UIWC Jurisdictional Share (Table 9.7) may play in determining Utah’s involvement in the procurement of resources in the Preferred Portfolio.

B. Discussion of Utah IRP

In the 2025 IRP the Company states that “[if] the Public Service Commission of Utah wishes to consider updated data and analysis, Chapters 1, 9, and 10 represent the most recent available results corresponding to these three Utah-specific Chapters 11 through 13.”⁴ UAE requests that the Company explain the significance of the Utah-specific IRP set forth in Chapters 11-13 of the 2025 IRP filing including how, if at all, the Company intends to utilize the data or information set forth in those chapters in Company processes, filings, tariffs, and analysis in Utah.

C. Boardman-Hemmingway Transmission Segment

The 2025 IRP states that the Boardman-Hemmingway transmission segment (B2H) is projected to be completed in 2027 but that the segment is not included in the preferred portfolio.⁵ B2H has been in development for several years and has been selected in past IRP preferred portfolios. The Company notes that it “is reevaluating the timing and needs analysis underlying B2H because of factors

² *Id.* at 211.

³ *Id.* at 182.

⁴ *Id.* at 319.


⁵ *Id.* at 84.

such as changed native load growth and a lack of capacity available on neighboring transmission systems to deliver to load pockets.”⁶ UAE requests that the Company provide further details regarding modeling for B2H, including whether the IRP model was allowed to select B2H but didn’t, or whether the Company barred the model from selecting B2H. If the former, please explain how model assumptions and inputs changed from prior IRP models in which B2H was selected. UAE also requests that the Company discuss the current status of construction and permitting and how the development processes for B2H have been modified (if at all) as a result of it not being included in the 2025 IRP Preferred Portfolio. UAE also requests that the Company provide its understanding of the potential for B2H to be completed in the future, including what factors would need to change for B2H to be included in future IRP preferred portfolios and the likelihood of those factors changing.

UAE appreciates the opportunity to submit these comments regarding the Company’s proposed agenda for the July 22 technical conference and looks forward to a constructive discussion regarding the 2025 IRP.

DATED this 3rd day of July 2025.

Respectfully submitted,

By: 

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⁶ *Id.* at 5.

Certificate of Service
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I hereby certify that a true and correct copy of the foregoing was served by email on July 3, 2025 on the following:

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/s/ Phillip J. Russell