



July 3, 2025

Utah Public Service Commission
Heber M. Wells Building
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Salt Lake City, UT 84111
psc@utah.gov

RE: Docket No. 25-035-22, PacifiCorp's 2025 Integrated Resource Plan (IRP)
Comments Regarding Technical Conference Agenda Proposed by PacifiCorp, doing business as Rocky Mountain Power

I. Introduction

On June 24, 2025, PacifiCorp, doing business as Rocky Mountain Power, (RMP or the Company) filed a proposed agenda for the 2025 Integrated Resource Plan (IRP) technical conference scheduled for July 22, 2025 in this docket. Utah Clean Energy (UCE) appreciates the opportunity to provide feedback on the proposed agenda.

II. Comments

Many of the topics included in the proposed agenda for the technical conference appear to be an overview of the 2025 IRP. This is only a three-hour technical conference, and the attendees are all likely to be well aware of the overall content of the 2025 IRP. Therefore, we request that RMP limit the amount of time spent on their overview so that more time can be spent on the Open Discussion, where we can discuss technical questions from stakeholders. We request that the overview be limited to no more than 20 minutes.

Below are specific topics we would like to discuss:

- Please describe how the ITC/PTC (Investment Tax Credit/Production Tax Credit) were modeled, how they were phased out, and what assumptions they were based on. Explain how those assumptions affected which resources were selected in the Preferred Portfolio and when they were selected. Explain what model variants were performed to understand how policy changes to the ITC/PTC could affect the cost uncertainties for ratepayers. This topic is in part motivated by PacifiCorp's response to our February 10, 2025 Stakeholder Feedback Form about the ITC/PTC where the Company said:
 - "Had PacifiCorp adopted a [ITC/PTC] cliff in 2041, rather than a downward trend, it would be more likely to trigger significant resource additions in 2031 (moving the spike [in wind and solar] from 2036 even earlier). Having PTC-induced demand so close to the 2030 compliance requirements in Oregon and

Washington could result in confusion about the purpose and need for resources. The downward trend ensures that the relative benefits related to the PTC drop incrementally from year to year, rather than all at once, such that resource need and other factors have a larger impact on selections.”

- Did the Company explore a scenario where the ITC/PTC credits expire in the near future? If not, why not?
- The Company included an inaccurately named sensitivity called “Low IRA/IIJA Eligibility” that explores how resource selections would change if there were no IRA/IIJA credits (this variant should be called “No IRA/IIJA Eligibility,” not “Low IRA/IIAJ Eligibility”). How did this variant inform the Action Plan?
- Given recent changes in federal legislation that will impact the ITC/PTC, what are the possibilities within the Action Plan to issue a rapid response Request For Proposals (RFP) or pursue bilateral agreements to start construction on projects to capture the ITC/PTC for ratepayers before those credits are phased out?
- We have reached out via email to the IRP team to discuss a potential issue with the Supply Side Resource Table, and how that compares with the National Renewable Energy Lab’s Annual Technology Baseline (NREL’s ATB). Pending further clarification of this issue, please include it as a topic for discussion and clarification.
- We request a discussion of the load forecast. Please discuss in specific how the Preferred Portfolio load forecast differs from the “Large-Metered Load Growth” variant.
 - Since this variant requires different transmission options that require long planning horizons, how does this variant inform the Action Plan?
 - If the “Large-Metered Load Growth” variant is more representative of the impacts of new large loads on the system than the Preferred Portfolio, what are the potential risks to system reliability, ratepayer costs, and economic development?
 - Has the Company compared their load forecast to any independent organization’s load forecast for the state, region, or service territory? If so, which ones?
- The 2025 IRP does not mention Governor Cox’s Operation Gigawatt’s initiative that has a goal to double Utah’s energy production in the next decade. It was unveiled on October 8, 2024. Is the 2025 IRP Preferred Portfolio or any of the model variants consistent with this initiative?
- We request that the Company discuss the agenda item “Integrating the System” in detail, in particular how and why the “Full Jurisdictional Portfolios” in Tables 9.5-9.7 are different from “Table 9.11 Preferred Portfolio with Jurisdictional Resource Selections.”
- In our Stakeholder Feedback Form from December 17, 2024, we requested a technology neutral sensitivity finding the least cost approach to achieve an 85% CO2 emission reduction by 2032. The Company responded: “PacifiCorp is currently evaluating the variety of sensitivity requests received and, should sufficient modeling time be available,

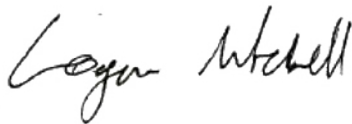
will incorporate this sensitivity in the March 31 final filing.” Why was this model variant not pursued?

- In our Stakeholder Feedback Form from Jan 14, 2025, we requested that emissions data be reported by state. Since the IRP planning process is projecting a decrease in emissions for Oregon customers, what does that do to emissions for Utah customers? PacifiCorp responded by saying that they are “actively looking for helpful ways to present emissions data in the final 2025 IRP and will consider this request to present state-level emissions data.” Was this data included in the 2025 IRP? Where can it be found? What does it show?
- How do the actual prices of Market Purchases in Action Plan Item 5a (or historic actual prices) compare to the Market Purchase prices used in the 2025 IRP? Were model variants pursued to explore different Market Purchase price ranges?
- Please discuss the Boardman to Hemmingway (B2H) transmission line updates. The 2025 IRP says “At this time, PacifiCorp is reevaluating the timing and needs analysis underlying B2H because of factors such as changed native load growth and a lack of capacity available on neighboring transmission systems to deliver to load pockets.” However, reevaluation of B2H is not in the Action Plan. Why was it omitted from the Action Plan? How will the lack of transmission capacity from B2H affect resource development in Utah that could serve the eastern part of PacifiCorp’s service area?

III. Conclusion

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

Sincerely,



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this day of July 3, 2025, to the following recipients, via email regarding Docket No. 25-035-22, PacifiCorp's 2025 Integrated Resource Plan:

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