

SPENCER J. COX
Governor
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Lieutenant Governor



MARGARET W. BUSSE
Executive Director

CHRIS PARKER
Division Director

Comments

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
David Williams, Utility Technical Consultant

Date: July 3, 2025

Re: **Docket No. 25-035-22 (PacifiCorp's 2025 Integrated Resource Plan)**—Utah Division of Public Utilities Comments on Proposed Agenda

The Utah Division of Public Utilities (Division) gives the following comments and suggestions regarding the Proposed Agenda from Rocky Mountain Power (the Company) for the July 22 Technical Conference in Docket No. 25-035-22.¹

1. The Division's understanding is that the 2025 Utah IRP and the 2025 IRP differ only in that the Utah 2025 IRP has three additional chapters (Chapters 11, 12, and 13 in Volume I), and that the information in Chapter 1 through 10 in the two IRPs is identical. The Division also understands that the information in Chapters 11, 12, and 13 can be viewed as preliminary or intermediate—in other words, those three chapters were based at least in part on inputs that were subsequently updated for the "main" 2025 IRP. The Division also understands that the results from Chapters 11, 12 and 13 of the Utah 2025 IRP will not be used for any analysis (the 2025 IRP results will be used instead, with updates as appropriate). The Division requests confirmation of this understanding at the Technical Conference and an explanation of why the two versions were necessary.

¹ The Company filed a "Utah 2025 Integrated Resource Plan" (2025 Utah IRP) in Utah in the present docket (Docket No. 25-035-22), and a "2025 Integrated Resource Plan" (2025 IRP) with other states and on its IRP website.



2. The Company's selection process for the preferred portfolio requires more detail. For example, in the 2023 IRP, the Initial and Variant Cases were presented in Table 9.14, and then on page 306, the IRP stated: "In consideration of current policies in motion and unmodeled risks for which ongoing trends recommend the adoption and development of tax-supported renewable projects, P-MM is determined as the preferred portfolio."² The equivalent list of candidate portfolios in the 2025 IRP is in Table 9.34. The Division finds little discussion regarding why the preferred portfolio was selected over others in the 2025 IRP, or even an explicit statement regarding which portfolio in Table 9.34 is the preferred portfolio. The Division understands it is "Integrated Base MN," but would like confirmation. Why was this portfolio selected over, for example, Integrated Base HH or others? The Division would also like a more detailed discussion of what non-modeling factors resulted in the selection of the preferred portfolio in the 2025 IRP (e.g. "current policies," "unmodeled risks," "ongoing trends," etc.). When was the 2025 IRP preferred portfolio first identified (what date)? When were the results of Table 9.34 finalized?
3. The Division would like details of the "end effects" mentioned in Table 9.34 of the 2025 IRP. The text above the table states that: "End effects were applied to all portfolios run under the MN price-policy for a 5-year period after the study horizon, results of which can be seen in this table."³ Please discuss the details of these end-effects and how they were applied.
4. The Division would like the Company to address the feasibility of preparing a "Utah-only" jurisdictional portfolio (similar to tables 9.2 through 9.7, except for Utah only). The conditions for the scenario would be along the following constraints. If the Company does not wish to perform these as part of the 2025 IRP, please indicate what forum it thinks would be appropriate for this analysis, and what information it would need from the Division to perform the analysis.
 - a. Utah takes over the shares of certain Company-owned gas or coal plants as Oregon and Washington depart them.

² 2023 Integrated Resource Plan, Vol. I, p. 306.

³ The end effects are also mentioned on page 187.

- b. Utah takes Washington's share of whatever they are not paying for under the Washington Inter-Jurisdictional Allocation Methodology (WIJAM).
- c. Assume large loads covered by Utah Senate Bill 132 (Utah Code Title 54 Chapter 26) find their own supply.
- d. Possible scenario wherein RMP assumes output from any available Intermountain Power Agency units.

cc: Michele Beck, OCS
Jana Saba, RMP
Max Backlund, RMP