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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of PacifiCorp's 2025 Integrated Resource Plan	)))	Docket No: 25-035-22

INITIAL COMMENTS OF THE INTERWEST ENERGY ALLIANCE

The Interwest Energy Alliance ("Interwest") hereby submits these initial comments in response to PacifiCorp's 2025 Integrated Resource Plan ("IRP").

INTRODUCTION

Interwest is a nonprofit 501(c)(6) trade association that brings together the nation's leading solar, wind, transmission, geothermal, and storage developers with the nongovernmental environmental community to expand renewable energy around the Intermountain West, including Utah, Wyoming, Colorado, New Mexico, Arizona, and Nevada. Interwest has been actively engaged in public input meetings hosted by PacifiCorp to develop each IRP over the last decade

and has been granted intervention in a number of Commission proceedings for review and implementation of PacifiCorp's proposed integrated resource plans, both in Utah and Wyoming.

SUMMARY OF RECOMMENDATIONS

Interwest recommends the Commission decline to acknowledge the IRP and the 4-Year Action Plan. Interwest also recommends that the Commission direct PacifiCorp to issue an expedited RFP to capture remaining tax credit eligible renewable projects and file a compliance filing that includes specific elements that should have been included in the 2025 IRP, and which will be required for all future IRPs. Finally, Interwest provides recommendations for PacifiCorp's compliance with HB 212 related to Advanced Transmission Technologies.

PacifiCorp's IRP was submitted to the Public Service Commission of Utah ("Commission" or "PSC") pursuant to Utah Code Ann. §54-17-3 and the 1992 Order on Standards and Guidelines for Integrated Resource Planning (Docket No. 90-2035-01, "Order on Standards and Guidelines" or "Guidelines").[1] Under the Utah PSC Guidelines, the Commission is tasked with deciding whether to acknowledge the IRP and the analysis used to prepare the Preferred Portfolio and the Action Plan to carry out its goals over the next four years. Acknowledgement does not create any presumption of regulatory approval for any of the resources or strategies contained within the IRP. The decisions related to approval and cost recovery are reserved for separate dockets where prudency of specific investments would be determined.

[1] https://pscdocs.utah.gov/electric/90docs/90203501/121607RprtOrdrStndrdsGdlnes6-18-1992.pdf

To be acknowledged in Utah, Guideline 4 requires that the IRP must include, in part, the following:

- A range of forecasts for future load growth
- Evaluation of all present and future resources, including demand side, supply side and market, on a consistent and comparable basis
- Analysis of the role of competitive bidding
- An action plan outlining specific resource decisions intended to implement the integrated resource plan in a manner consistent with the Company's strategic business plan
- A plan of different resource acquisition paths for different economic circumstances decision mechanism to select among and modify these paths as the future unfolds
- A cost effectiveness methodology including a description of how social concerns might affect cost effectiveness estimates of resource options
- An evaluation of the financial, competitive, reliability and operational risks associated with resource options, and how the action plan addresses these risks
- Identification of how risks are allocated between ratepayers and shareholders
- An analysis of tradeoffs

Interwest is generally disappointed with several of PacifiCorp's decisions in the 2025 IRP and find the support provided for those decisions to be unpersuasive. One adverse result of these decisions is that PacifiCorp continues to incorporate reduced levels of renewable energy into its

Preferred Portfolio without much regard to the social concerns, risk to ratepayers, or cost impact. This trend will produce a significantly less diverse portfolio of resources that will not effectively maintain a reliable and cost-effective portfolio, to the detriment of its customers.

Interwest recommends the Commission find that the 2025 PacifiCorp IRP and the Action Plan do not adhere to the PSC Guidelines and should not be acknowledged. Interwest recommends the Commission order PacifiCorp to issue an expedited Request for Proposal ("RFP") for jurisdictional needs, at minimum, through 2031 and require the following elements to be included in a compliance filing for the 2025 IRP and for inclusion in future IRPs:

- Require PacifiCorp to report on, and include in modeling, large new industrial and data center loads that do not have an executed direct access agreement.
- Require PacifiCorp to identify specific Action Plan items, such as specific RFPs and RFP approval processes, that will fulfill Utah jurisdictional needs.
- Require PacifiCorp to maintain consistency with previous resource planning documents and business planning documents by including the Boardman to Hemingway transmission line in the 2025 IRP unless it provides compelling evidence justifying removing it.
- Require PacifiCorp to report on and include analysis of Advanced Transmission Technologies as required by HB 212 (Utah Code 54-17-1101) in a manner consistent with our recommendations.

DISCUSSION

1. An expedited RFP to capture remaining federal tax credits is in the public interest and the best interest of Utah customers.

The 2025 IRP system-wide preferred portfolio includes 3,181 MW of solar and 2,641 MW of wind by the early 2030s. The jurisdictional portfolio for Utah, Idaho, Wyoming, and California (UIWC) portfolio includes 668 MW of solar and 744 MW of wind within the same timeframe. To meet this deadline under the supply chain constrained environment that was present when PacifiCorp filed its IRP, PacifiCorp needed to begin an RFP process early within the 2025 IRP Action Plan. However, given the recent federal tax changes in H.R. 1[2] and subsequent U.S. Department of Treasury guidance,[3] PacifiCorp should be required to further accelerate procurement to capture the maximum amount of remaining tax credits for the benefit of its customers, and these amounts should be the bare minimum of identified need. As further identified in Docket No. 25-035-52, billions of dollars of savings are available to Utah customers if the Commission acts quickly and decisively. The need for this urgent RFP is particularly relevant given the fact that PacifiCorp declined to include large customer loads from the load forecast, which suggests that the resource needs in Utah are unknown but will likely be materially larger than PacifiCorp represents in the 2025 IRP. The Commission should direct PacifiCorp to issue an immediate RFP to begin procuring resources to satisfy all forecasted load in Utah on a timeline that takes advantage of the remaining federal tax credits.

[2] Public Law 119-21, 139 Stat. 72, §§ 70512-13 (July 4, 2025).
[3] https://www.irs.gov/pub/irs-drop/n-25-42.pdf

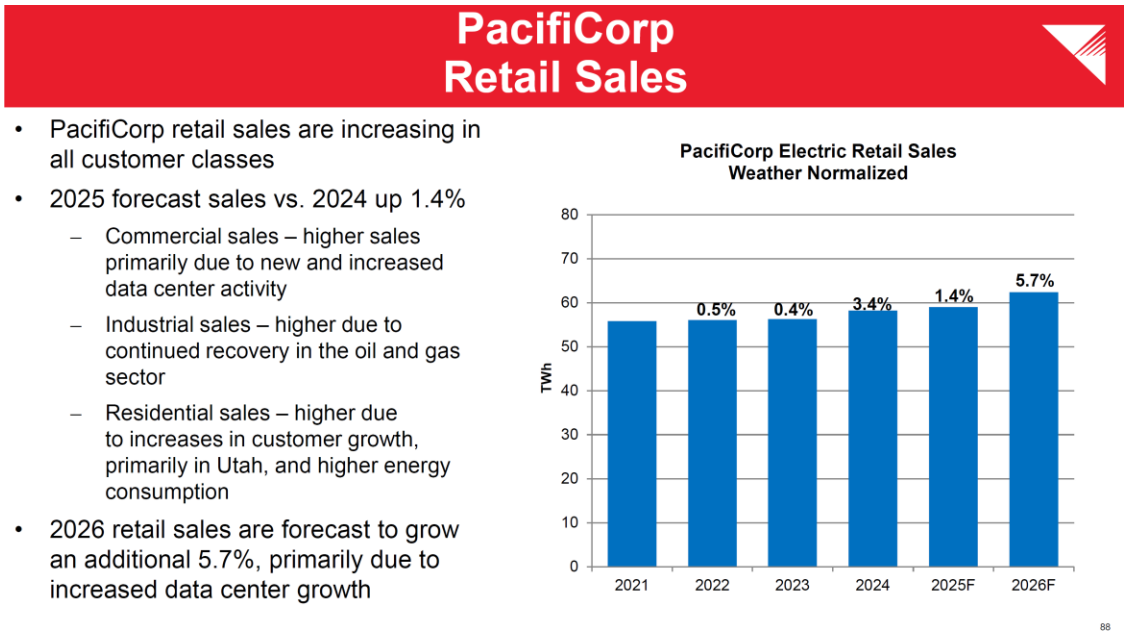
2. The load forecasts in the 2025 IRP are inadequate and do not represent the most likely customer base due to PacifiCorp excluding anticipated large industrial and data center loads.

PacifiCorp's 2025 IRP load forecast projects steady but modest growth across its system, driven primarily by economic and demographic trends, with significant uncertainty tied to large new industrial and data-center loads.[4] The plan anticipates roughly a 1.3% compound annual growth rate in retail sales over the next decade, translating to continued growth in both energy (MWh) and peak demand (MW).[5] The forecast is developed jurisdiction by jurisdiction, integrating assumptions about electrification, energy efficiency, distributed generation, and weather-normalized demand.[6] However, PacifiCorp explicitly excludes non-firm wholesale sales and certain large prospective loads, instead presenting alternative scenarios that account for *potential* high-growth outcomes.[7] PacifiCorp explained this new exclusion by saying that these customers are "expected to provide or pay for" their own resources.[8]

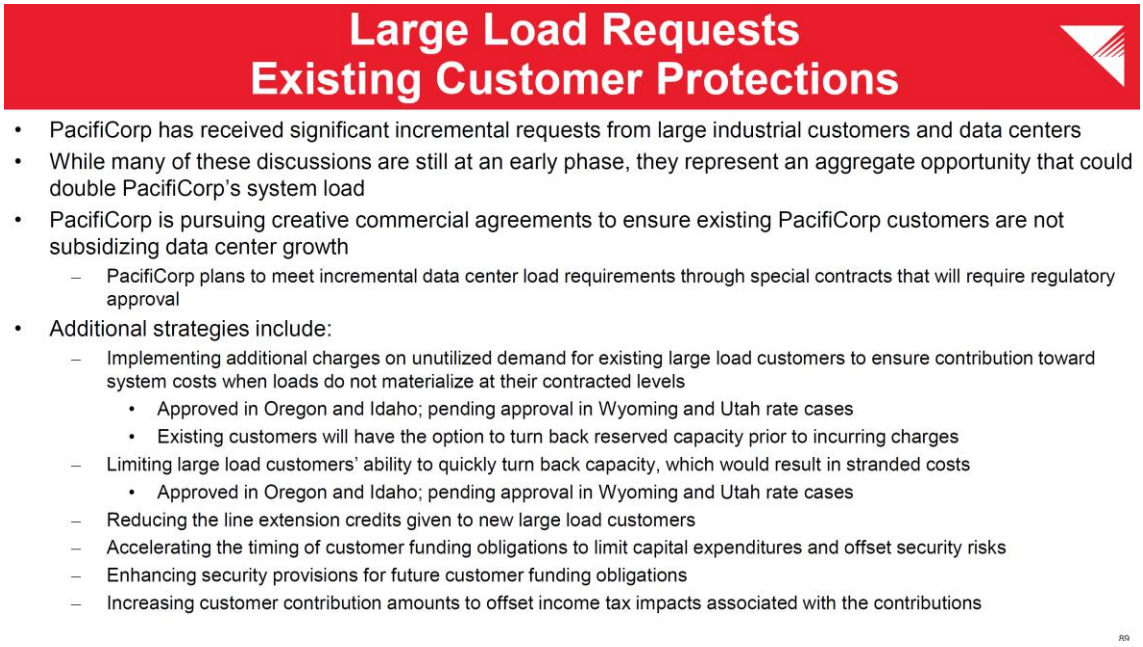
Utah IRP Guideline 4(a)(i) and (ii), requires consideration of "various economic and demographic factors" affecting consumption and directs PacifiCorp to include all on-system load obligations. By excluding anticipated large industrial and data center loads on the basis that these customers are "expected to provide or pay for" their own resources, PacifiCorp is in violation of this guideline. This exclusion is a fundamental departure from prior IRPs, and other planning processes, and has the effect of materially lowering the 10- and 20-year demand outlook. For

[4] PacifiCorp's IRP Vol 2, page 1.
[5] Id.
[6] Id.
[7] PacifiCorp's IRP, Vol 1, page 9.
[8] Id.

example, PacifiCorp projects only a 1.28% compound annual growth rate in demand over the next decade, despite acknowledged scenarios where data center growth could require more than 5,000 MW of additional resources.[9] As shown below, in its 2025 Berkshire Hathaway Energy Investor Presentation, PacifiCorp retail sales are expected to grow 5.7% in 2026 primarily due to data center growth and data centers represent "an aggregate opportunity that could double PacifiCorp's system load."[10]



[9] Vol II, page 18, Figure A.5.
[10] Berkshire Hathaway Energy, 2025 Fixed-Income Investor Conference slide deck, https://www.berkshirehathaway.com/bhenergy/BHE2025InvestPresent.pdf at pages 88 and 89.



The IRP is designed to identify the most probable version of the future in which PacifiCorp will need to operate, and the resources needed to reliably and cost effectively serve customers within that scenario. Assuming that a substantial number of those customers will not be served by utility resources without robust substantiation is the equivalent of PacifiCorp picking and choosing which loads to include. The only exception to the load forecast should be for direct access agreements that are signed at the time the load forecast is developed. Absent such agreements, all reasonably foreseeable retail load must be planned for in the IRP. Exclusion of large loads undermines the IRP's value as a comprehensive, least-cost plan for Utah customers, and risks shortfalls in both reliability and compliance with regional adequacy obligations.

Accordingly, the Commission should decline to acknowledge the load forecast and direct PacifiCorp to refile with all projected large loads included, or at minimum to present binding scenarios that quantify system needs with and without those loads.

3. The near-term Action Plan is too vague to acknowledge.

The Guidelines require both a 20-year planning horizon and a four-year action plan that outlines specific actions for the first two years, anticipated actions for the next two, and status reporting on prior commitments.[11] While the 2025 IRP includes a 20-year horizon, the near-term action plan is too vague to satisfy the requirements in the Guidelines.

The only system wide "New Resource Actions" identified in the IRP are: "PacifiCorp will issue as appropriate by jurisdiction need, one or more all-source Request for Proposals (RFP) to procure resources aligned with the Utah 2025 IRP preferred portfolio that can achieve commercial operations by the end of December 2029" and "In light of the differentiated resource needs by jurisdiction identified in the Utah 2025 IRP, scope and targeted resource needs may vary by jurisdiction."[12] These statements do not provide any information about the specific resources or resource needs that the RFP—if one is issued in Utah—is intended to address to satisfy load in Utah. This lack of specificity violates Guideline 4(e), which requires actionable commitments tied to the Company's business plan.[13] This is also inconsistent with previous IRP action plans. In the 2023 IRP, PacifiCorp said "PacifiCorp will issue an all-source Request for Proposals (RFP) to procure resources aligned with the 2023 IRP preferred portfolio that can achieve commercial operations by the end of December 2028." The Utility went on to describe in detail when it would notify the Commission of the need for an independent evaluator, when it would file a draft RFP

[11] Guidelines 4(d) and (e).
[12] Vol I, page 333.
[13] Guidelines at 4(e) ("An action plan outlining the specific resource decisions intended to implement the integrated resource plan in a manner consistent with the Company's strategic business plan").

with the Commission, when it expected approval of the draft RFP, and finally when it would identify a final shortlist, obtain regulatory approval of those projects and execute definitive agreements with the winning bids.[14] PacifiCorp provided this same level of detail and commitment in the 2021 IRP.[15] Without enforceable short-term steps, customers risk losing access to federal tax credits and entering the Western Resource Adequacy Program[16] ("WRAP") binding period without adequate accredited capacity, and the Commission has no certainty that PacifiCorp will have sufficient resources to reliably meet customer load.

A vague Action Plan also chills generation market development. Regulatory timing and approval risks can have important and outsized impacts on the efficiency of the competitive electricity supply markets, which this Commission can help address. This Commission should direct a more regular pattern of issuing requests for proposals following each IRP, aligned with its interconnection queue study process, so that procurements can proceed in an efficient manner.

A regular pattern of RFP issuance would also help alleviate the disconnect with the FERC-approved tariff governing the interconnection queue study process. The interconnection queue study process is rigid in its time limits and deadlines, so coordinating the interaction of these processes can minimize disruption, risks and cost to developers selling projects to PacifiCorp. If bidders can be confident about when RFPs will be issued to acquire resources to fill the need identified in each IRP, then they can plan their engagement in the interconnection queue study

[14] PacifiCorp's 2023 IRP, Volume I, page 349.
[15] PacifiCorp's 2021 IRP, Volume I, pages 276-277.
[16] https://www.westernpowerpool.org/about/programs/western-resource-adequacy-program

process so that they are fully prepared to estimate transmission upgrade costs with each bid response. Overall, predictability creates a more efficient and competitive market.

Interwest urges the Commission to require a supplemental filing within 90 days, providing a revised four-year action plan that:

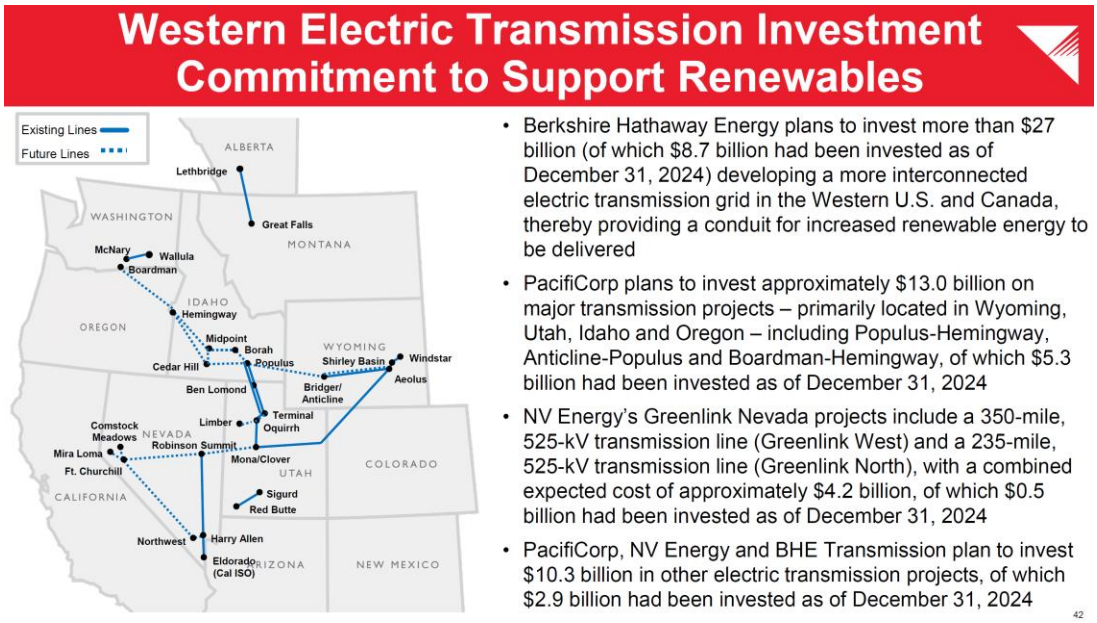
- Identifies specific RFPs for necessary resources and transmission.
- Aligns procurement timelines with expiring federal incentives and market expectations.

4. The 2025 IRP deviates from other planning processes and does not justify the deviation.

Guideline 9 requires PacifiCorp's IRP to be directly related to its strategic business plan. Yet the 2025 IRP departs from the Company's own long-term capital planning in key respects, including load forecasts as discussed above. Additionally, the IRP excludes the Boardman-to-Hemingway (B2H) transmission line as a system resource. PacifiCorp said "at this time, the Boardman-to-Hemingway transmission line (B2H) is not included in the preferred portfolio. 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."[17] Eliminating B2H contradicts prior commitments and undermines Utah customers' ability to access low-cost renewable generation in the Pacific Northwest. [18] The decision to exclude B2H is based, at least in part, on PacifiCorp's unreasonable

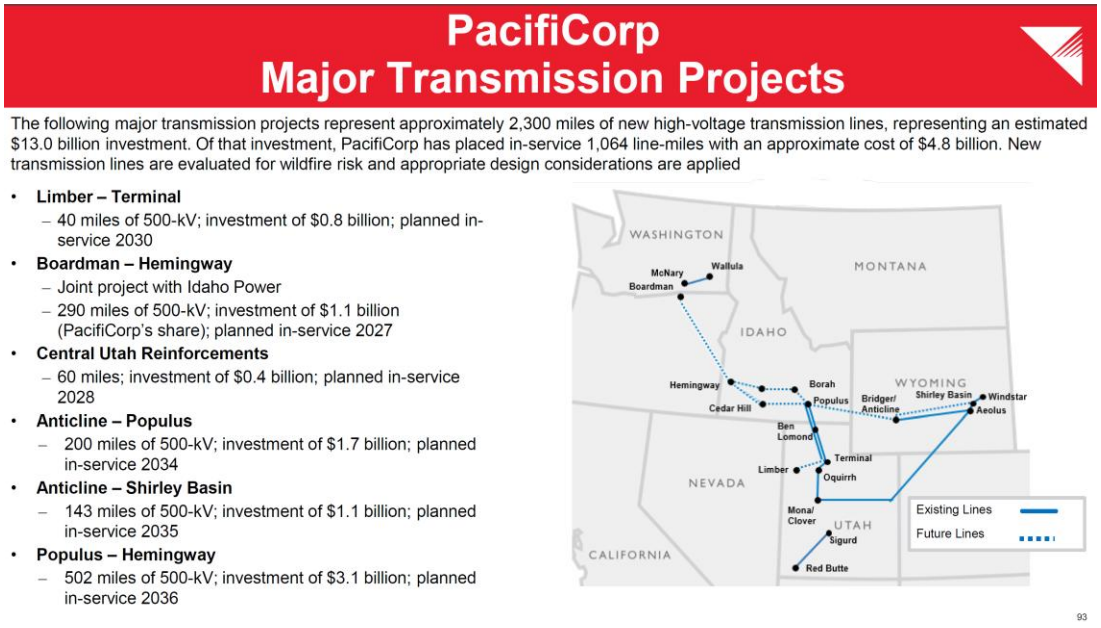
[17] Volume I, 324.
[18] *See* PacifiCorp's 2023 IRP, page 101 ("Given the extensive list of benefits noted above, PacifiCorp is committed to participating in the Boardman-to-Hemingway project in accordance with the terms of the Joint Funding Permitting

decision to exclude large customer loads from the IRP which has the effect of suppressing native load growth, one of the factors cited as the basis for this decision. The removal of B2H represents a substantial deviation from previous IRPs and the utility's strategic business plan.[19]



Agreement through pre-construction activities and negation of the three party terms, and will continue to work with Idaho Power in the development and negotiations of the definitive agreement for the construction and ownership of the new line"); Berkshire Hathaway Energy, 2025 Fixed-Income Investor Conference slide deck, pages 42 and 93, *found at*: https://www.berkshirehathaway.com/bhenergy/BHE2025InvestPresent.pdf ("PacifiCorp plans to invest approximately $13.0 billion on major transmission projects – primarily located in Wyoming, Utah, Idaho and Oregon – including Populus-Hemingway, Anticline-Populus and Boardman-Hemingway, of which $5.3 billion had been invested as of December 31, 2024").

[19] *Id.*



This inconsistency between corporate planning and the IRP violates the Guidelines' requirement of alignment and erodes confidence that the IRP reflects actual utility intentions. The Commission should not acknowledge the IRP until PacifiCorp demonstrates consistency with its business plan or provides compelling evidence justifying any deviation.

5. Recently passed HB 212 requires PacifiCorp to include and analyze Advanced Transmission Technologies, and the Commission should issue guidance on how PacifiCorp should comply with this requirement in future IRPs.

The recently passed HB 212, enacted as Section 54-17-11 of the Utah Code, requires the utility to analyze the cost effectiveness and timelines for deploying Advanced Transmission Technologies (ATTs) as an alternative strategy when proposing transmission additions in an integrated resource plan filing (ATT Requirements).[20] The utility is required to report, in part, on

[20] Utah Code Ann. § 54-17-1101(2).

whether the ATTs would *increase*: 1) transmission capacity, including connection of new energy resources, 2) efficiency, 3) reliability, and 4) resiliency; or *reduce*: 1) transmission congestion, 2) the curtailment of energy from generation resources, and 3) the risk of igniting wildfire.[21]

Interwest believes that ATTs can provide a critical role in identifying the most cost-effective portfolio of generation and transmission resources for customers. The Guidelines require evaluation of all present and future resources on a consistent and comparable basis, including assessments of technical feasibility, lead-time requirements, flexibility, efficiency, and dispatchability.[22] Transmission capability directly affects each of these factors, as no generation resource can be considered reliable or cost-effective without a means to deliver it. The Guidelines also call for analysis of tradeoffs between reliability, dispatchability, and least-cost resource acquisition—issues squarely implicated by transmission constraints and solutions.[23] In this context, incorporating ATTs into the IRP process ensures that PacifiCorp is evaluating a complete range of feasible generation and transmission resource options, consistent with the requirement to minimize total costs while safeguarding reliability and long-term public interest.

Given the complexity of ATTs, Interwest believes that establishing a common understanding of the technologies will help the Commission provide guidance to the utility on how to comply with the new requirements in HB 212. To that end, Interwest provides a short overview of these technologies and their value, as well as some recommended information and analysis to include in future IRPs to comply with the requirements in Section 54-17-11.

[21] *Id.* at (2)(a)(ii).
[22] Guideline 4(b).
[23] Guideline 4(j).

HB 212 defines ATTs as technology that increases the capacity, efficiency, or reliability of electric transmission infrastructure.[24] It specifically includes the following ATTs: 1) dynamic line ratings technology, 2) advanced power flow controls, 3) topology optimization software, 4) advanced transmission line conductors that increase the power transfer capacity of transmission lines, and 5) energy storage technologies.[25] The first three ATTs optimize the use of the existing transmission system capacity, while the fourth, installation of advanced conductors, increases transmission line capacity. Lastly, energy storage can modify generation resource injections to match the available transmission capacity.

a. Dynamic Line Rating Technologies

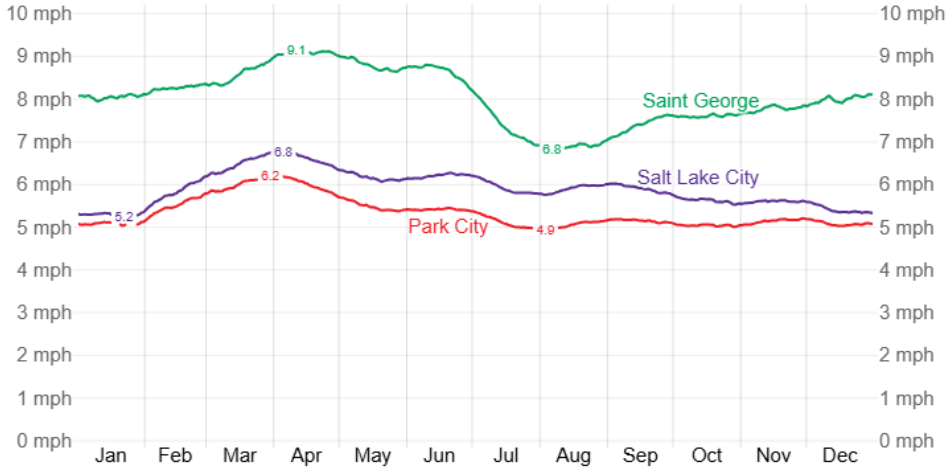
Dynamic line ratings technology adjusts the real-time rated capacity of transmission lines based on real-time conditions. The technologies with the most proven operational experience are: 1) weather-based models with weather stations that continuously compute temperature, wind, and solar radiation for the region where the transmission lines traverse, and 2) direct conductor monitoring of sag, tension, or temperature sensors. The weather-based modeling, direct conductor monitoring, and their combination can provide average capacity gains of 10-20%, 15-25%, and 20-30%, respectively. They could even provide short-term capacity increases of up to 40 to 50%. If the weather-based modeling is regionally based (i.e., informed by wide-scale weather data), it could cover multiple lines at a lower cost than the direct monitoring method, which would be applied to each specific line. The weather-based modeling is a lower cost method than direct

[24] Utah Code Ann. § 54-17-1101 at (1)(a).
[25] *Id.* at (1)(b).

monitoring and may work well for a transmission path where multiple lines are within a geographic region. The direct monitoring method, a higher cost technology, may provide a cost-effective approach for a single constrained line. A combination of these two technologies can provide an increased capacity benefit compared to each method on its own.

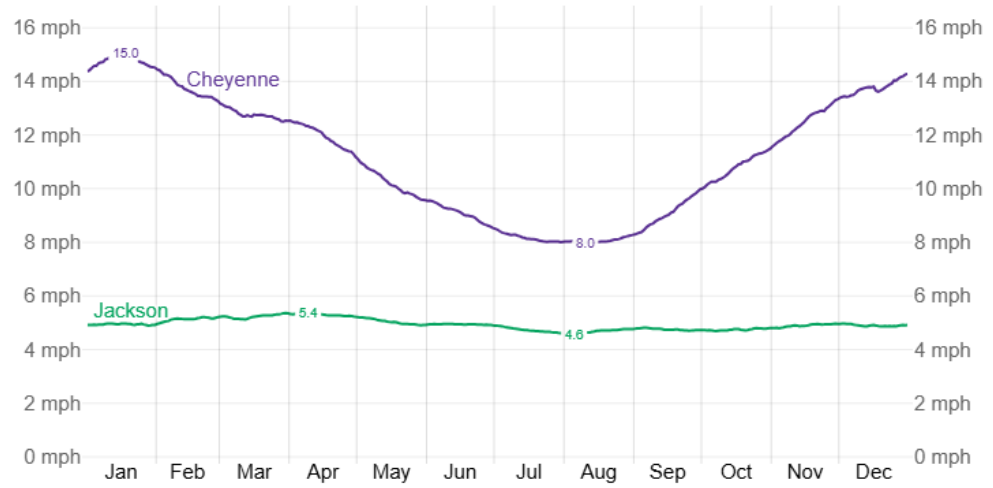
While dynamic line ratings technology will increase transmission line capacity, that capacity increase may not occur during peak congestion periods because wind speed is the dominant factor for cooling a transmission conductor and allowing increased capacity. For instance, Utah's electricity demand peaks during the summer months when wind speeds are generally lower, as shown in Figure 1 below. Conversely, Wyoming winds peak in the winter along with the highest electrical demand, as shown in Figure 2 below.

Figure 1 Utah Annual Wind Speed Profile



Source: https://weatherspark.com/countries/US/UT

Figure 2 Wyoming Annual Wind Speed Profile



Source: https://weatherspark.com/countries/US/WY

b. Advanced Power Flow Controls

Advanced power flow controls actively control the flow of electricity across a transmission line. These devices may be applied on a line or lines where some are at capacity while capacity remains available on other parallel lines and diverting flow increases the overall transfer capacity. There are three technologies within this ATT class that actively adjust the line flow by changing impedance in series with the line, and changing the impedance can raise or retard the line current flow. A Smart Wires SmartValve applies a voltage in quadrature to simulate capacitance or reactance, a thyristor-controlled series capacitor uses thyristors to control the amount of capacitance, and a static synchronous series compensator simulates a reactance with a series voltage applied in quadrature to the line voltage. A fourth type of advanced power flow control is a unified power flow controller, which contains voltage source converters that inject a voltage in series with the line and can perform like the three technologies above along with injecting voltage in-phase with the line current injecting real power. The unified power flow controller also injects

a shunt voltage providing reactive support for the transmission system. Advanced power flow controls can direct flow to best utilize the entirety of the transmission system.

c. Optimal Transmission Grid Configurations

Topology optimization is performed through software that works in conjunction with SCADA systems to open lines (breakers) and thereby change the transmission system configuration. This reconfiguration can reduce congested lines by increasing the impedance to the point of congestion resulting in flow steered away from the congested points. The cost to implement topology optimization is relatively low and it can identify system configurations to reduce congestion during normal system conditions and during planning equipment outages. To maintain reliable operating configurations, a utility must ensure that the solution algorithm includes sufficient outage scenario probabilities. Topology optimization can best utilize the multiple paths available on the transmission system.

d. Advanced Transmission Line Conductors

Advanced transmission line conductors are a collection of conductors that allow higher operating temperatures with less sag than traditional aluminum conductor steel reinforced (ACSR) resulting in increased capacity. Most of these conductors replace the steel reinforcement with a supporting core made of steel, carbon fiber, ceramic fiber, or nickel-iron alloy that reduced elongation under high temperature conditions. These advanced materials can increase the line's maximum operating temperature, resulting in increased capacity of 120-200 percent.

e. Energy Storage Technologies

Energy storage technologies can be installed at resource and load locations to reduce transmission congestion by storing generation at the resource and discharging stored energy when the lines are congested. Although energy storage does not increase transmission capacity, it allows the existing transmission to operate up to its capacity and serve load above this capacity while reducing resource curtailment.

Developers have been installing energy storage with solar resources to capture energy that would be otherwise curtailed and extend a solar plant's capability into the evening hours. Additionally, utilities have been installing energy storage at substations to defer transmission line and substation replacement.

It is our understanding that PacifiCorp Transmission, like many utilities, presently evaluates the applicability of ATTs when identifying a transmission capacity need. To comply with the new ATT Requirements, PacifiCorp must provide their analysis of the cost effectiveness and timetable to deploy ATT through the IRP process in a transparent manner and clearly lay out where and how ATTs can lead to increases in 1) transmission capacity, including connection of new energy resources, 2) efficiency, 3) reliability, and 4) resiliency; or reductions in 1) transmission congestion, 2) the curtailment of energy from generation resources, and 3) the risk of igniting wildfire. SB 212 requires analysis and presentation of the cost differences between a traditional transmission upgrade and ATTs to compare the benefits and costs of such technologies.

The following table provides a summary of the relevant attributes for each ATT and their link to the new requirements.

Advanced Transmission Technology	Where Applied	Utah Requirement Application in IRP	Magnitude of Capacity Increase During Peak				Additional Benefits within Utah Code	Requirements to Achieve
			Winter	Spring	Summer	Fall		
Dynamic Line Rating	Anywhere where transmission is constraining flow	54-17-1101(2)(a)(ii) (A), (C), (D) and (H)	MEDIUM cool temps	LARGE high average wind speed (WY, UT)	SMALL high temps and low wind speed (WY, UT)	MEDIUM	54-17-1101(2)(a)(ii) (F)	Sensors and software installation, experience, and probabilistic modeling
Advanced Power Flow Control	Locations where the flow across lower capacity lines can be redirected to other lines.	54-17-1101(2)(a)(ii) (A), (C), (D) and (H)	MEDIUM	MEDIUM	MEDIUM	MEDIUM	54-17-1101(2)(a)(ii) (E) and (G)	Identification, installation, and settings
Topology Optimization	System wide with benefits occuring in paths with multiple lines that can be optimized	54-17-1101(2)(a)(ii) (A), (C), (D) and (H)	MEDIUM	MEDIUM	MEDIUM	MEDIUM	54-17-1101(2)(a)(ii) (E) and (G)	Software, establish risk management, and operations training
Advanced Conductors	Lines with parallel transmission	54-17-1101(2)(a)(ii) (A), (C), (D) and (H)	LARGE	LARGE	LARGE	LARGE	54-17-1101(2)(a)(ii) (F)	Reliability analysis and installation
Energy Storage	Load pocket or variable generation location where transmission is causing curtailment	54-17-1101(2)(a)(ii) (C) and (D)	Does not increase transmission capacity				54-17-1101(2)(a)(ii) (B)	Identification through probabilistic modeling and installation

Utah 54-17-1101(2)(a)(ii) Code Requirement
(A) increase transmission capacity
(B) increase transmission efficiency
(C) reduce transmission system congestion
(D) reduce curtailment of energy generation resources
(E) increase reliability
(F) reduce the risk of igniting wildfire
(G) increase resiliency
(H) increase capacity to connect new energy resources

f. ATT Recommendations

Interwest offers the following recommendations for the Commission to include guidance to PacifiCorp implementing the requirements discussed above:

- Require a transparent description of PacifiCorp's process for identifying all transmission expansion options considered in its modeling. This should be provided in both the IRP document itself and in stakeholder meetings and materials. This would significantly aid in ensuring transparency of ATT consideration.
- Require PacifiCorp to identify in the IRP all the transmission expansion options included in its capacity expansion modeling. Within these options, identify the ones that employ ATTs as well as explain for the remaining options whether potential ATT solutions were considered but ruled out.
- Require PacifiCorp to identify all instances (locations and conditions) where its production cost modeling identifies transmission congestion or generation curtailment. This level of transparency is a key component of being able to review whether and how PacifiCorp evaluates the potential for ATTs to reduce congestion and/or curtailment.
- Require PacifiCorp to develop and report on methods for the holistic consideration of ATTs. The synergies and complementary nature among and between different ATTs, and different deployment of ATTs, may require the development of new techniques for future assessment and incorporation into the IRP.

SUMMARY OF RECOMMENDATIONS

Interwest recommends the Commission find that the 2025 PacifiCorp IRP and the Action Plan do not adhere to the PSC Guidelines and should not be acknowledged. Interwest recommends the Commission order PacifiCorp to issue an expedited RFP for jurisdictional needs, at minimum, through 2031 and require the following in a compliance filing and for inclusion in future IRPs:

- Require PacifiCorp to report on, and include in modeling, large new industrial and data center loads that do not have an executed direct access agreement.
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- Require PacifiCorp to maintain consistency with previous resource planning documents and business planning documents by including the Boardman to Hemingway transmission line in the 2025 IRP unless it provides compelling evidence justifying removing it.
- Require PacifiCorp to report on and include analysis of Advanced Transmission Technologies as required by HB 212 (Utah Code 54-17-1101) in a manner consistent with our recommendations.

Interwest appreciates the opportunity to submit these comments.

Respectfully submitted,

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