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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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| In the Matter of PacifiCorp's 2025 Integrated<br>Resource Plan | DOCKET NO. 25-035-22 |
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REPLY COMMENTS OF WESTERN RESOURCE ADVOCATES

November 25, 2025

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Western Resource Advocates (WRA) provides these Reply Comments to the Public Service Commission of Utah (PSC or Commission) pursuant to the April 16, 2025, Scheduling Order, Notice of Technical Conference, and Notice of Public Witness Hearing regarding PacifiCorp's 2025 Integrated Resource Plan (IRP).

## **I. INTRODUCTION**

On September 25, 2025, nine parties, including WRA, filed initial comments regarding PacifiCorp's 2025 IRP.<sup>1</sup> Of the nine, only the Division of Public Utilities (DPU or Division) recommended acknowledgement, but with exceptions,<sup>2</sup> while the Office of Consumer Services (Office) did not oppose acknowledgement.<sup>3</sup> Both agencies cited an improved public input process, and this apparent improvement appears to be a primary consideration in supporting or not opposing acknowledgement.

WRA's Reply Comments respond to the suggestion by the agencies that the public input process was improved or that the Company complied with Guideline 3. Indeed, PacifiCorp's conduct in this IRP cycle was more problematic than in prior cycles. Without public vetting, PacifiCorp (1) introduced jurisdictional planning in the Draft IRP, (2) replaced the jurisdictional integration method introduced in the Draft IRP with an integration method in the Final IRP that

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<sup>1</sup> Division of Public Utilities (Division or DPU), Interwest Energy Alliance (Interwest), Office of Consumer Services (Office), Sierra Club, Southwest Energy Efficiency Project (SWEEP), Utah Association of Energy Users (UAE), Utah Clean Energy (UCE), Vote Solar, and WRA.

<sup>2</sup> *Comments from the Division of Public Utilities*, Docket No. 25-035-22 (filed September 26, 2025) at 1 [hereinafter DPU Comments].

<sup>3</sup> *Comments from the Office of Consumer Services*, Docket No. 25-035-22 (filed September 26, 2025) at 3 [hereinafter OCS Comments].

resulted in a suboptimal, bifurcated plan, and (3) included “end effects” prior to selecting the Preferred Portfolio. Further, PacifiCorp’s late-breaking decision to sub-optimally plan for the east and west sides of its system separately devalued the public input process.

These Reply Comments clarify the distinction between jurisdictional planning and bifurcated planning and demonstrate that they are not the same. The Draft IRP incorporated jurisdictional planning but produced a system plan; the Final IRP incorporated jurisdictional planning but produced a bifurcated plan. The difference is in the integration step, and PacifiCorp’s process for developing integrated portfolios changed deleteriously between the Draft and Final IRPs.

Finally, these Reply Comments support the Sierra Club’s recommendation that the Commission require PacifiCorp to simulate two system-level optimizations, one assuming reliability requirements only and a second including state compliance requirements. These simulations should be provided in addition to any jurisdictional method the Company may propose.

Our purpose in providing these Reply Comments is fourfold:

- To respond to the agencies’ suggestion that the public input process was improved.
- To underscore the magnitude of the fundamental shift that occurred between the Draft IRP and the Final IRP.
- To clarify for the Commission the distinction between “jurisdictional planning” that produces a **system plan** (with undetermined optimality), as was done with the Draft IRP, and “jurisdictional planning” that results in a **bifurcated plan** (necessarily suboptimal), as was done with the Final IRP.
- To reiterate our recommendation that the Commission decline to acknowledge the 2025 IRP and require PacifiCorp to undertake optimized system planning against which the cost of any deviations can be understood.

## II. REPLY COMMENTS

### **A. PacifiCorp's Nth-Hour Veiled Decision to Bifurcate Planning was Misleading and Violated the 1992 Commission Order Establishing Standards and Guidelines for Integrated Resource Planning.**

In our Initial Comments, WRA recommended that the Commission not acknowledge the 2025 IRP.<sup>4</sup> Through our comments we demonstrated that the Company had not complied with the 1992 Order on IRP Standards and Guidelines, specifically Guidelines 1<sup>5</sup> and 3<sup>6</sup> as well as components of Guideline 4,<sup>7</sup> and that it had ignored multiple Commission orders underscoring the importance of system planning and operations.<sup>8</sup>

We explained that the Company had produced a plan for a bifurcated system rather than a system plan, and that it had made this fundamental change between the Draft IRP and the Final IRP without public vetting. Indeed, it waited until the final minutes of the last meeting of the public input process to partially disclose the significant change that it intended to implement in the Final IRP. Under the agenda item "Stakeholder Feedback," PacifiCorp revealed its decision to limit the geographical location of proxy resources, effectively creating a bifurcated plan. The Company characterized this as "Oregon Compliance,"<sup>9</sup> even though the implications for least-

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<sup>4</sup> *Initial Comments of Western Resource Advocates*, Docket No. 25-035-22 (filed September 25, 2025) at 5 [hereinafter WRA Comments].

<sup>5</sup> *Id.* at 14-17, 23-33.

<sup>6</sup> *Id.* at 7-14.

<sup>7</sup> *Id.* at 32.

<sup>8</sup> *Id.* at 18-22

<sup>9</sup> *Id.* at 13, n.24.

cost, least-risk planning are substantial and the economic impacts likely considerable.<sup>10</sup> The February 2025 public input meeting slide deck only mentions limiting the geographical location of resources to meet west side needs to the west side; the decision to also limit the geographical location of resources to meet east side needs is not in the slide deck, but was brought out in the limited discussion that followed the ending of the meeting.<sup>11</sup>

While the implications of this planning decision are profound, PacifiCorp never revealed how its changed approach would partially upend the many hours of public discussion regarding model optimization logic, the granularity adjustment, the reliability adjustment, and other modeling conventions that pertained to optimizing portfolios given price/policy and other variant and sensitivity constraints. This shift from system optimization to suboptimal, ad hoc portfolio development to meet east and west side needs separately appears to have misled stakeholders and wasted hours of public engagement.

**B. The 2025 IRP Public Input Process Is Not an Improvement Over the 2023 IRP Public Input Process; PacifiCorp Did Not Comply with Guideline 3 or Past Commission Orders Interpreting Guideline 3.**

From the outset, it appears that the Company never intended to seek public collaboration on certain key decisions. This was signaled in the initial schedule-setting that did not build-in an opportunity to review modeling results or provide input into the selection of the Preferred Portfolio.<sup>12</sup> When WRA sought through our first feedback form to assist the Company in being

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<sup>10</sup> *Id.* at 23-26; *see also Sierra Club's Opening Comments on PacifiCorp's 2025 Integrated Resource Plan*, Docket No. 25-035-22 (filed September 26, 2025) at 6-7 [hereinafter *Sierra Club Comments*].

<sup>11</sup> WRA Comments, *supra* note 4, at 13, n.24.

<sup>12</sup> *Id.* at 7-8.

responsive to past Commission Orders and Utah stakeholders' concerns, our input was ignored,<sup>13</sup> as was the April 17, 2024, Order regarding the acknowledgement of the 2023 IRP (April Order) issued roughly six weeks later.<sup>14</sup>

Instead of seeking to collaborate on key issues, the Company made decisions without public vetting. The concepts of "Jurisdictional Portfolios," the method for integrating "Jurisdictional Portfolios" into "Integrated System Portfolios," and the determination of "Jurisdictional Shares" were introduced in the Draft IRP and publicly discussed for the first and only time during the January 22-23, 2025, public input meeting following the Draft IRP filing.<sup>15</sup> And, as discussed above, sometime between the Draft IRP filing and the Final IRP filing, PacifiCorp fundamentally changed the integration approach, resulting in a suboptimal bifurcated plan and mooted the January discussion.<sup>16</sup> Finally, for the Final IRP, PacifiCorp included "end effects" in its economic analysis before selecting its Preferred Portfolio. This additional analysis appears to have provided the rationale for not selecting one of two other portfolios as its Preferred Portfolio (both with lower emissions profiles).<sup>17</sup>

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<sup>13</sup> *Id.* at 8.

<sup>14</sup> *Id.* at 9. The Company's August 8, 2024, request to "[a]llow PacifiCorp to update the 2025 IRP for any material changes in the planning environment that may occur prior to the submission of the 2025 IRP" appears to be another signal that PacifiCorp was internally evaluating key decisions that it did not want to publicly vet. *PacifiCorp's Notice to Public Service Commission of Utah*, Docket No. 23-035-10 (filed August 8, 2024) at 12. And, when the Draft IRP was filed, the Company did not include the results of the stochastic analysis or select a Preferred Portfolio based on stochastic analysis. This too suggests that the Company was still weighing key decisions that it was unwilling to publicly vet.

<sup>15</sup> WRA Comments, *supra* note 4, at 17-18. A similar approach was included in the 2023 IRP Update. *See* OCS Comments, *supra* note 3, at 4.

<sup>16</sup> WRA Comments, *supra* note 4, at 14-18.

<sup>17</sup> DPU Comments, *supra* note 2, at 19-20; and WRA Comments, *supra* note 4, at 34-39.

The 2025 IRP Public Input Process is not an improvement over past IRP cycles and cannot be considered compliant with Guideline 3 or past Commission orders regarding the interpretation of Guideline 3.<sup>18</sup> It is but an amplified continuation of the approach PacifiCorp took with the 2023 IRP that the Commission rejected in its April Order.<sup>19</sup>

**1. *The Issuance of Timely Meeting Materials Does Not Constitute Compliance with Guideline 3.***

The Division recommends that the Commission “acknowledge” the 2025 IRP with “exceptions.” Specifically, it recommends that the Commission not acknowledge Chapters 11-13, which constitute the “Utah IRP.”<sup>20</sup>

The Division’s recommendation appears to rest on its assessment of an improved public input process. The Division states that it “appreciates and commends the efforts of the Company to improve the public input process for the 2025 IRP cycle. The Company did a good job providing presentation materials before public meetings.”<sup>21</sup> It also suggests that the Company’s selection of the Preferred Portfolio, once end effects were included, was a less opaque decision than in the past.<sup>22</sup>

However, providing timely presentation materials does not compensate for PacifiCorp’s disregard of Guideline 3 and past Commission direction articulated in multiple orders, including,

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<sup>18</sup> WRA Comments, *supra* note 4, at n.7 and pages 7 and 9. *See also Initial Comments of the Utah Association of Energy Users*, Docket No. 25-035-22 (filed September 26, 2025) at 4-6 [hereinafter UAE Comments].

<sup>19</sup> WRA Comments, *supra* note 4, at 9.

<sup>20</sup> DPU Comments, *supra* note 2, at 1.

<sup>21</sup> *Id.* at 2.

<sup>22</sup> *Id.* at 19-20.



most recently, the April Order.<sup>23</sup> Certainly, it is not consistent with the language the Division quotes from the April Order:

PacifiCorp must provide parties ample opportunity to review, analyze, and provide *meaningful input* at all stages of the IRP process ... this must be done with adequate time for PacifiCorp to evaluate and, as appropriate, apply that input before filing any IRP, whether preliminary or final.<sup>24</sup>

Contrary to the Division's conclusion, which appears to promote process over substance, WRA does not view the 2025 IRP public input process as an improvement over the 2023 IRP public input process. Additionally, the Division's seeming approval of the Company's selection of the Preferred Portfolio, given the lack of public input in its selection, seems inconsistent with their prior positions. PacifiCorp's conduct of the public input process is not an improvement over the 2023 IRP, but, as stated above, an amplified continuation of the approach PacifiCorp took with the 2023 IRP that the Commission rejected in its April Order.

***2. Filing a Draft IRP Does Not Constitute Progress Toward Compliance with Guideline 3 or Past Commission Direction Regarding Guideline 3.***

Similar to DPU, the Office's recommendation not to oppose acknowledgment appears to rest on its assessment of an improved public input process, specifically the provision of modeling results provided in the Draft IRP as well as the removal of the restriction on new natural gas resource selection.

[T]he OCS notes that, to its credit, PacifiCorp has made progress in the 2025 IRP in some of the areas that the OCS and other parties criticized as being deficient in comments on the 2021 and 2023 IRPs. Areas such as providing preliminary

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<sup>23</sup> WRA Comments, *supra* note 4, at n.7 and pages 7 and 9; *see also* UAE Comments, *supra* note 18, at 4-6.

<sup>24</sup> DPU Comments, *supra* note 2, at 3 (citing April Order) (emphasis added).

modeling results to stakeholders and not giving some resources (e.g. natural gas-fired generators) comparable treatment as company-favored resources (e.g. Natrium nuclear or non-emitting peakers). For the 2025 IRP, a draft IRP was filed on December 31, 2024 (providing modeling results three months before the final IRP was due to be filed) and new natural gas resources were not deliberately handicapped as in the prior two IRPs.

....With these difficulties in mind and the progress made on improving compliance with Utah IRP Standards and Guidelines, the OCS does not oppose acknowledgment of the 2025 IRP.<sup>25</sup>

WRA disagrees that PacifiCorp's filing of the Draft IRP (filed in compliance with the requirements of the Washington Utilities and Transportation Commission) represents compliance with or progress toward compliance with Guideline 3 or past Commission direction interpreting Guideline 3. As we have demonstrated, the results from the Draft IRP have little to no relation to the selection of the Preferred Portfolio in the Final IRP; thus stakeholders did not have opportunity to review results and provide feedback. Furthermore, the consequential changes made *after* the filing of the Draft IRP that were never fully vetted directly violate Guideline 3. As previously stated, PacifiCorp's conduct in the 2025 IRP public input process is not an improvement over past IRP public input processes, but an amplified continuation of the approach PacifiCorp took with the 2023 IRP public input process that the Commission rejected.

**C. Including Chapters in the Final IRP Document from an Incomplete and Error-Ridden Draft IRP Does Not Constitute Compliance with the Commission's September 24, 2024, Order Denying PacifiCorp's Request to Incorporate Late-Breaking Changes.**

In September of 2024, the Commission issued an order in Docket No. 23-035-10 denying an August 8, 2024, request from PacifiCorp to incorporate late breaking changes into the 2025

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<sup>25</sup> OCS Comments, *supra* note 3, at 3.

IRP and imposing a “data lockdown date” of January 1, 2025, consistent with the expected filing of the 2025 Draft IRP.<sup>26</sup> To address the extensive changes it implemented between the Draft and Final IRP,<sup>27</sup> while still attempting to comply with the Order, PacifiCorp included three Chapters replicating information from the Draft IRP in the Final IRP document.<sup>28</sup>

WRA appreciates the direction the Commission provided in its September Order, and PacifiCorp’s expressed desire to comply through the inclusion of these chapters. However, as described in our Initial Comments, the Draft IRP had numerous significant errors and was never completed.<sup>29</sup> Significantly, the Company did not include stochastic analysis, and the selection of the Preferred Portfolio was based on flawed deterministic data. Therefore, the inclusion of these three Chapters cannot constitute compliance. Compliance would have required that PacifiCorp correct the errors and complete the analysis.

**D. Jurisdictional Planning and Bifurcated Planning Are Not The Same: The Draft IRP Incorporated Jurisdictional Planning But Produced A System Plan; The Final IRP Incorporated Jurisdictional Planning But Produced A Bifurcated Plan.**

Based on WRA’s review of initial comments, the Company’s late and unvetted decisions to introduce jurisdictional planning in the Draft IRP and then replace the method discussed in the January meeting with a suboptimal approach in the Final IRP were either not clearly understood or not clearly delineated. Given the dearth of information provided through the public input

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<sup>26</sup> DPU Comments, *supra* note 2, at 2-3.

<sup>27</sup> WRA Comments, *supra* note 4, at 11-14.

<sup>28</sup> *Id.* at 11-14; DPU Comments, *supra* note 2, at 4-6.

<sup>29</sup> WRA Comments, *supra* note 4, at 11-14.

process or in written documentation,<sup>30</sup> the fact that many parties either did not address the consequential implications or appeared to mix terminology is understandable.<sup>31</sup> Therefore, we want to reiterate that the jurisdictional integration approach used for the Final IRP is not the jurisdictional integration method described in the Draft IRP and to clarify that jurisdictional planning and bifurcated planning are not necessarily synonymous. The Draft IRP incorporated jurisdictional planning but integrated the three optimized jurisdictional portfolios (Oregon,

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<sup>30</sup> *Id.* at 17-18.

<sup>31</sup> The Division references the “2025 Utah IRP” and the “System IRP” suggesting that it understands the Final IRP to be an optimized “system plan” and not a suboptimal bifurcated plan. *See* DPU Comments, *supra* note 2, at 1. Further, in identifying changes made between the Draft and Final IRPs, the Division doesn’t identify a changed integration method. *Id.* at 3-4. The Division makes no mention of jurisdictional planning.

In distinguishing the 2025 IRP’s “integration approach” from the “2023 IRP’s layered approach,” the Office doesn’t differentiate between the integration approach used in the Draft IRP versus the Final IRP. OCS Comments, *supra* note 3, at 2. However, the Office does make other comments that recognize that PacifiCorp is “moving away from its historical goal of operating as a six state system planning tool that identifies the optimized least cost, lowest risk single-system portfolio,” and it also recognizes that “[t]he additional costs imposed by satisfying jurisdictional requirements in the way PacifiCorp is proposing to do may be even higher as new resources are not shared across the system.” *Id.* at 5.

UAE discusses the integration of jurisdictional portfolios, but does not comment on the difference in the integration method used for the Draft IRP versus the Final IRP. Whether UAE recognizes the implications of the significant difference in approach between the Draft IRP and Final IRP for system optimality is not clear. UAE Comments, *supra* note 18, at 11-13.

It appears that UCE may use the term “jurisdictional portfolio methodology” to refer to the jurisdictional approach used in the Final IRP. *Comments of Utah Clean Energy*, Docket No. 25-035-22 (filed September 26, 2025) at 4.

While the Sierra Club clearly understands that the integration approach used for the Final IRP differs from the Draft IRP resulting in a suboptimal plan (Sierra Club Comments, *supra* note 10, at 2), its terminology in places suggests that jurisdictional planning and bifurcation are the same (*see e.g., Id.* at 6).

Interwest distinguishes between the “system-wide preferred portfolio” and the “jurisdictional portfolio for Utah, Idaho, Wyoming, and California (UIWC),” suggesting that it understands the Final IRP to have produced an optimized “system plan” not a suboptimal bifurcated plan. *Initial Comments of Interwest Energy Alliance*, Docket No. 25-035-22 (filed September 26, 2025) at 5.

Vote Solar and UCE/SWEEP make no mention of jurisdictional planning or its consequences.

Washington, Utah/Idaho/Wyoming/California (UIWC)) in a manner that appears to have maintained, although likely imperfectly, system-optimization.<sup>32</sup> The integration step in the Final IRP, conversely, unwound the three optimized jurisdictional portfolios by geographically limiting proxy resource locations, which then required the ad hoc addition of generation and transmission resources.<sup>33</sup> This approach is necessarily suboptimal and costly for all jurisdictions<sup>34</sup> and must be rejected.

As expressed in our Initial Comments, WRA supports PacifiCorp's goal of developing a plan that is compliant with state specific requirements, and we are not necessarily opposed to the system-based, jurisdictional planning method that the Company introduced in the Draft IRP; we simply never had the opportunity to evaluate that approach before it was abandoned. However, the cost consequences of any jurisdictional approach must be understood through sound analysis. In these comments we refine our previous recommendation regarding the need for system modeling to support the general approach the Sierra Club recommended in its Opening Comments.<sup>35</sup>

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<sup>32</sup> WRA Comments, *supra* note 4, at 17-18.

<sup>33</sup> *Id.* at 14-17.

<sup>34</sup> *Id.* at 23-26; Sierra Club Comments, *supra* note 10, at 3-9; OCS Comments, *supra* note 3, at 5.

<sup>35</sup> Sierra Club Comments, *supra* note 10, at 2.

**E. In Addition to Any Jurisdictional Method the Company May Propose, PacifiCorp Should Provide Two System-Optimized Modeling Simulations Consistent with the Commission’s Foundational Principles of Current Cost Causation and Single-System Planning and Operation.**

For the 2027 IRP, for every price/policy, modeling variant, and sensitivity study, in addition to whatever other approach PacifiCorp may propose, the Company should provide two system-level optimizations, consistent with the general approach Sierra Club recommended in its initial comments. The first optimization would include reliability requirements only. The second would add state specific compliance requirements.<sup>36</sup> The difference between the two optimizations would reflect the cost of compliance with state requirements. This difference would become a baseline for understanding the cost consequences of implementing any jurisdictional approach and would be consistent with the Commission’s foundational principles of current cost causation and single-system planning and operation.<sup>37</sup>

**III. CONCLUSION**

For all the reasons expounded upon in our Initial Comments and summarized in these Reply Comments, the Commission should not acknowledge the 2025 IRP and should direct the Company to undertake optimized single-system analysis against which any deviations from a single-system approach can be evaluated.

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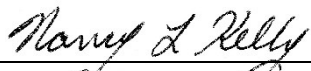
<sup>36</sup> The Office referred to this as “layering.” OCS Comments, *supra* note 3, at 2.

<sup>37</sup> WRA Comments, *supra* note 4, at 19-22.

Dated this 25th day of November 2025.

Respectfully submitted,

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