

#### DPU Data Request 5.4

**CONFIDENTIAL REQUEST** - In reference to the spreadsheet “CONFIDENTIAL RMP Workpapers 3 - Cost Summary Base.2503 MN (LT. 155264 - 186051) 10-20-2025”. Table 12 (rows 81 through 93) on tab “Cost Summary DELTA” represents the difference in generation mix with and without Natrium as compared to the 2025 IRP preferred portfolio. Table 12 on tab “Cost Summary DELTA” is derived from the corresponding tables in: (1) Table 12 on the “Cost Summary” tab in the same Excel file (Workpaper 3), and (2) Table 12 in the “Cost Summary” tab in Excel file “CONFIDENTIAL RMP Workpapers 4 - Cost Summary Base.2503 MN woNatrium (LT. 155264 - 186007) 10-20-2025”.

The Division understands Workpaper 4—Cost Summary Base MN w/o Natrium to be a model description of the resource mix and costs without Natrium. However, the energy mix for the year 2031 in Workpaper 4—Cost Summary Base MN w/o Natrium<sup>1</sup>, the year before Natrium starts, [REDACTED]

[REDACTED] in Workpaper 3—Cost Summary Base MN.<sup>2</sup> The Division would expect that if the model [REDACTED]

For example, Figure 9.19 in the 2025 IRP (“Increase/(Decrease) in Proxy Resources with No Nuclear”) shows portfolio changes in 2027-2031 leading up to the “absence” of the Natrium plant, resulting in a different resource mix for 2027-2031. [REDACTED]

#### Response to DPU Data Request 5.4

For “CONFIDENTIAL RMP Workpapers 3 - Cost Summary Base.2503 MN (LT. 155264 - 186051) 10-20-2025” (Workpaper 3) and “CONFIDENTIAL RMP Workpapers 4 - Cost Summary Base.2503 MN woNatrium (LT. 155264 - 186007) 10-20-2025” (Workpaper 4), and the economic analysis presented in the Company’s direct testimony in this proceeding, PacifiCorp did not reoptimize the generation portfolio with and without the Natrium plant (Kemmerer Power Station Unit 1 (KU1)). The only change in the generation portfolio between Workpaper 3 and Workpaper 4 is the removal of all of KU1’s forecasted generation, which impacts 2032 and beyond.

At this time, PacifiCorp cannot know whether KU1 will perform as anticipated in 2032 and beyond or if it will ever generate. A resource portfolio that optimized with the

<sup>1</sup> See tab “Cost Summary”, Table 12 (at rows 81 to 93, column J) in Workpaper 4—Cost Summary Base MN w/o Natrium.

<sup>2</sup> See tab “Cost Summary”, Table 12 (at rows 81 to 93, column J) in Workpaper 3—Cost Summary Base MN.

expectation that KU1 will never reach commercial operation would be sub-optimal if KU1 were to reach commercial operation and operate as expected. On the other hand, a resource portfolio that was optimized with KU1 would be sub-optimal if KU1 did not reach commercial operation. Given KU1 is reliant upon first-of-a-kind (FOAK) technology, it is appropriate to maintain flexibility for either outcome. For example, it would be premature to commit to retire a Naughton unit in anticipation of KU1 achieving commercial operation. Because of the risk-mitigation aspects incorporated in the contract pricing in the power purchase agreement (PPA), the cost-effectiveness of KU1 is not dependent on forecasted changes in the resource mix.

In PacifiCorp's Integrated Resource Plan (IRP), the "No Natrium" scenario is fully optimized around the assumption that the Natrium facility never exists and is never anticipated to exist either before or after 2032, to provide a contrast to more fully reflect the impact of Natrium's capabilities over the long-term.