

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UM 2032**

In the Matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of
Network Upgrade Costs for Qualifying
Facilities

NEWSUN’S CROSS-EXAMINATION
EXHIBIT LIST

NewSun Energy LLC (“NewSun”) hereby submits this cross-examination exhibit list.

Cross-Examination Exhibits	
Number	Title
NewSun/600	PacifiCorp Request for General Rate Revision, Docket No. UE 399, Direct Testimony of Richard A. Vail (March 1, 2022).
NewSun/601	PacifiCorp “Executed but Not In Service” Interconnection Queue as of 5/13/22 (accessed on 5/24/22).
NewSun/602	PacifiCorp 2020 All-Source RFP Final Shortlist Presentation, Docket No. UM 2059 (July 30, 2021).
NewSun/603	PacifiCorp “Cluster Study #2” Interconnection Queue as of 5/23/22 (accessed on 6/3/22).
NewSun/604	PacifiCorp Response to NewSun Data Request 48
NewSun/605	PacifiCorp Response to NewSun Data Request 49

Dated this 9th day of June 2022.

Respectfully submitted,

NewSun Energy LLC

/s/ Marie P. Barlow
Marie P. Barlow, In-House Counsel,
Policy & Regulatory Affairs
NewSun Energy LLC
mbarlow@newsunenergy.net

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities

EXHIBIT NEWSUN/600

PacifiCorp Request for General Rate Revision, Docket No. UE 399,

Direct Testimony of Richard A. Vail (March 1, 2022).

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

Direct Testimony of Richard A. Vail

March 2022

TABLE OF CONTENTS

I. INTRODUCTION AND QUALIFICATIONS 1

II. PURPOSE OF TESTIMONY 1

III. OVERVIEW OF PACIFICORP’S TRANSMISSION SYSTEM AND INVESTMENT
DRIVERS 2

IV. OVERVIEW OF INVESTMENTS DESCRIBED IN TESTIMONY 6

V. GOSHEN TO SUGARMILL TO RIGBY 161 KV TRANSMISSION LINE
PROJECT..... 9

VI. JORDANELLE TO MIDWAY 138 KV TRANSMISSION LINE PROJECT 15

VII. CONCLUSION..... 17

ATTACHED EXHIBITS

Exhibit PAC/601—Goshen to Sugarmill to Rigby 161 kV Transmission Line Project

Exhibit PAC/602—Jordanelle to Midway 138 kV Transmission Line Project

1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name, business address, and present position with PacifiCorp**
3 **d/b/a Pacific Power (PacifiCorp or the Company).**

4 A. My name is Richard A. Vail. My business address is 825 NE Multnomah Street, Suite
5 1600, Portland, Oregon 97232. My present position is Vice President of
6 Transmission. I am responsible for transmission system planning, customer generator
7 interconnection requests and transmission service requests, regional transmission
8 initiatives, capital budgeting for transmission, transmission and distribution project
9 delivery, and administration of the Open Access Transmission Tariff (OATT).

10 **Q. Please describe your education and professional experience.**

11 A. I have a Bachelor of Science degree with Honors in Electrical Engineering with a
12 focus in electric power systems from Portland State University. I have been Vice
13 President of Transmission for PacifiCorp since December 2012. I was Director of
14 Asset Management from 2007 to 2012. Before that position, I had management
15 responsibility for a number of organizations in PacifiCorp’s asset management group
16 including capital planning, maintenance policy, maintenance planning, and
17 investment planning since joining PacifiCorp in 2001.

18 **II. PURPOSE OF TESTIMONY**

19 **Q. What is the purpose of your testimony in this case?**

20 A. The purpose of my testimony is to describe PacifiCorp’s transmission system and the
21 benefits it provides to Oregon customers. PacifiCorp’s transmission system is
22 designed to reliably transfer electric energy from a broad array of generation
23 resources to load. PacifiCorp’s interconnection to other balancing authority areas

1 (BAAs) and participation in the Energy Imbalance Market (EIM) provide access to
2 markets and promote affordable and reliable service to PacifiCorp's customers.
3 Further, all transmission system capacity increases provide benefits to customers by
4 increasing reliability and allowing more generation to interconnect to serve customer
5 load, as well as allowing PacifiCorp flexibility in designating generation resources for
6 reserve capacity to comply with mandatory reliability standards.

7 I also specifically describe PacifiCorp's major capital investment projects for
8 new transmission systems included in this rate case. My testimony demonstrates that
9 the Company has made prudent decisions related to these projects and that these
10 investments result in an immediate benefit to PacifiCorp's customers in Oregon.

11 I recommend that the Public Utility Commission of Oregon (Commission) find these
12 investments prudent and in the public interest.

13 **III. OVERVIEW OF PACIFICORP'S TRANSMISSION SYSTEM AND**
14 **INVESTMENT DRIVERS**

15 **Q. Please briefly describe PacifiCorp's transmission system.**

16 A. PacifiCorp owns and operates approximately 17,700 miles of transmission lines
17 ranging from 46 kilovolts (kV) to 500 kV across multiple western states. PacifiCorp
18 has nearly two million customers with approximately 631,000 customers located in
19 Oregon.

20 For convenience in load and resource planning, PacifiCorp groups its local
21 area transmission and distribution system into load areas. These load areas are
22 regions in which the PacifiCorp system is generally contiguous within the load area,
23 while a set of transmission constraints and boundaries separate the load area from

1 other portions of the PacifiCorp system. In Oregon, PacifiCorp generally has three
2 primary load areas: Southern Oregon, Central Oregon, and the Willamette Valley.
3 These primary load areas are further divided into 23 sub-areas within Oregon for
4 planning purposes when evaluating the capability of the PacifiCorp system to meet
5 the load and resource requirements of its customers.

6 **Q. Please describe PacifiCorp's responsibility for maintaining reliability on its**
7 **transmission system.**

8 A. In 1996, the Federal Energy Regulatory Commission (FERC) issued Order No. 888,¹
9 which required that transmission system owners provide non-discriminatory access to
10 their transmission systems. PacifiCorp is obligated under its OATT to plan its
11 transmission system for the open access of all transmission customers. Through the
12 OATT Attachment K local planning process and the FERC Order 1000 regional and
13 inter-regional planning processes, PacifiCorp participates in open stakeholder
14 planning processes covering its entire transmission footprint. These planning
15 processes result in system plans that incorporate economics, reliability, and public
16 policy inputs and requirements. PacifiCorp must also coordinate with other entities in
17 the region for transmission planning purposes as required under FERC Order 1000.²
18 In addition to these more general requirements, PacifiCorp also must comply with the
19 specific requirements of the mandatory reliability standards approved by FERC.

¹ *Promoting Wholesale Competition Through Open Access Non-discriminatory Transmission Services by Pub. Util.; Recovery of Stranded Costs by Pub. Util. and Transmitting Utilities*, Order No. 888, 61 FR 21540 (May 10, 1996), FERC Stats. & Regs. ¶ 31,036 (1996), order on reh'g, Order No. 888-A, 62 FR 12274 (Mar. 14, 1997), FERC Stats. & Regs. ¶ 31,048 (1997), order on reh'g, Order No. 888-B, 81 FERC ¶ 61,248 (1997), order on reh'g, Order No. 888-C, 82 FERC ¶ 61,046 (1998).

² *Transmission Planning and Cost Allocation by Transmission Owning and Operating Pub. Util.*, Order No. 1000, 76 FR 49842 (Aug. 11, 2011), FERC Stats. & Regs. ¶ 31,323 (2011), order on reh'g, Order No. 1000-A, 139 FERC ¶ 61,132 (2012), order on reh'g, Order No. 1000-B 141 FERC ¶ 61,044 (2012).

1 **Q. Who establishes transmission reliability standards?**

2 A. FERC directs the North American Electric Reliability Corporation (NERC) to
3 develop reliability standards to ensure the safe and reliable operation of the Bulk
4 Electric System (BES) in the United States in a variety of operating conditions. On
5 April 1, 2005, NERC established a set of transmission operations reliability
6 standards. A subset of the transmission reliability standards are the transmission
7 planning standards (TPL Standards). The purpose of the TPL Standards is to
8 “establish Transmission system planning performance requirements within the
9 planning horizon to develop a BES that will operate reliably over a broad spectrum of
10 System conditions and following a wide range of probable Contingencies.”³ The TPL
11 Standards, along with regional planning criteria (*i.e.*, regional planning criteria
12 established by the Western Electricity Coordinating Council (WECC)) and utility-
13 specific planning criteria, define the minimum transmission system requirements to
14 safely and reliably serve customers.

15 **Q. How does PacifiCorp ensure compliance with the TPL Standards?**

16 A. The Company plans, designs, and operates its transmission system to meet or exceed
17 NERC Standards for BES and WECC regional standards and criteria. To ensure
18 compliance with applicable TPL Standards, PacifiCorp conducts an annual system
19 assessment to evaluate the performance of the Company’s transmission system and to
20 identify system deficiencies. The annual system assessment is comprised of steady-

³ See <http://www.nerc.com/files/tpl-001-4.pdf>.

1 state, stability, and short circuit analyses⁴ to evaluate peak and off-peak load seasons
2 in the near-term (one-, two-, and five-year) and long-term (10-year) planning
3 horizons. The assessment is performed using power flow base cases maintained by
4 WECC and developed in coordination among all transmission planning entities in the
5 Western Interconnection. These base cases include load and resource forecasts along
6 with planned transmission system changes for each of the future year cases and are
7 intended to identify future system deficiencies to be mitigated.

8 As part of the annual system assessment, corrective action plans are developed
9 to mitigate identified deficiencies, and may prescribe construction of transmission
10 system reinforcement projects or, as applicable, adoption of new operating
11 procedures. In certain instances, operating procedures prescribing action to change
12 the configuration of the transmission system can prevent deficiencies from occurring
13 when there are two back-to-back (N-1-1) (or concurrent) transmission system events.
14 However, the use of operating procedure actions has limitations. In particular, actions
15 taken in connection with operating procedures that are designed to protect the
16 integrity of the larger integrated transmission system in the Western Interconnection
17 of the United States can lead to large numbers of customers being at risk of an outage
18 upon the occurrence of the second of two back-to-back (N-1-1) events. An effective
19 corrective action plan is critical to ensuring system reliability so that large numbers of
20 customers are not subjected to avoidable outage risk.

⁴ Analyses consist of taking a normal system (N-0) and applying events (N-1, N-1-1, N-2, etc.) within each category (P0, P1, P2, P3, etc.) listed within the TPL Standards in order to identify system deficiencies. Example: An N-1-1 event describes two transmission system elements being out of service at the same time, but due to independent causes. An example of an N-1-1 event would be a planned outage of one 230 kV transmission line followed by an unplanned outage of any element in the system being used to continue service with the initial element out.

1 **Q. Is compliance with the reliability standards optional?**

2 A. No. The reliability standards are a federal requirement, subject to oversight and
3 enforcement by WECC, NERC, and FERC. PacifiCorp is subject to compliance
4 audits every three years and may be required to prove compliance during other NERC
5 or WECC reliability initiatives or investigations. Failure to comply with the
6 reliability standards could expose the Company to penalties of up to \$1 million per
7 day, per violation. Accordingly, and as described more fully later in my testimony,
8 compliance with reliability standards is a major driver for the new capital investments
9 in PacifiCorp's system transmission assets identified in and supported by my
10 testimony.

11 **Q. Please identify other drivers that are relevant to the capital investments in
12 PacifiCorp's transmission system described in your testimony.**

13 A. There are several other drivers that inform whether PacifiCorp will build new
14 transmission facilities, including increased demand for transmission capacity, requests
15 for transmission service, and the age and condition of existing transmission facilities.
16 The specific drivers for the projects addressed in my testimony are described in more
17 detail later in my testimony.

18 **IV. OVERVIEW OF INVESTMENTS DESCRIBED IN TESTIMONY**

19 **Q. What specific transmission system investments are you addressing in your
20 testimony?**

21 A. My testimony addresses PacifiCorp's major new transmission system projects
22 included in this general rate case filing. Specifically, my testimony addresses the
23 following projects:

1 **1. Goshen to Sugarmill to Rigby 161 kV Transmission Line Project**

2 The Goshen to Sugarmill to Rigby 161 kV transmission line rebuild of an
3 existing 69 kV line from Goshen substation to Sugarmill substation and then
4 construction of a new 161 kV line from Sugarmill substation to Rigby substation
5 located in the southeast Idaho area, as shown in the map attached in Exhibit PAC/601;
6 and

7 **2. Jordanelle to Midway 138 kV Transmission Line Project**

8 The Jordanelle to Midway 138 kV transmission line project constructed nine
9 miles of 138 kV transmission line between Midway and Jordanelle substations in
10 Utah, as shown in the map attached in Exhibit PAC/602.

11 **Q. What are the projected costs associated with these transmission investments and**
12 **their associated in-service dates?**

13 A. Table 1 identifies the specific projects and associated costs and in-service dates.

TABLE 1		
Project	Total Company Cost (\$m)	In-Service Date
Goshen-Sugarmill-Rigby 161kV Transmission Line Project	\$23.2m	July 2022
Jordanelle-Midway 138kV Transmission Line Project	\$21.9m	December 2021

14 These amounts include costs associated with engineering, project
15 management, materials and equipment, construction, right-of-way (including rights
16 acquired by condemnation), and an allowance for funds used during construction.
17 These costs are also shown in the testimony and exhibits of Ms. Sherona L. Cheung.
18 The in-service dates are based on the best available information at the time of
19 preparing this case.

1 **Q. Please briefly describe the benefits associated with these investments.**

2 A. The benefits associated with these investments include increased load serving
3 capability, enhanced reliability, conformance with NERC Reliability Standards,
4 improved transfer capability within the existing system, relief of existing congestion,
5 and interconnection and integration of new wind resources into PacifiCorp's
6 transmission system. These benefits will be described more fully below.

7 **Q. Will PacifiCorp's OATT transmission customers pay for some of these assets?**

8 A. Yes, through OATT transmission charges. The Company's current transmission
9 formula rate (included in PacifiCorp's OATT) was approved by FERC in Docket No.
10 ER11-3643.⁵ The Company's transmission formula rate is updated annually with the
11 annual transmission revenue requirement (ATRR) that represents the annual total cost
12 of providing firm transmission service over the test year. The ATRR calculation
13 incorporates all transmission system investments by the Company, a return on rate
14 base, income taxes, expenses, and certain revenue credits, among other specific
15 elements and adjustments. Transmission assets, including new transmission capital,
16 are included in the ATRR, weighted by months in service. The ATRR is converted
17 into a rate by dividing the ATRR by firm transmission demand. All third-party
18 revenues for transmission service (along with third-party revenues for ancillary
19 services) are included as revenue credits in the calculation of rates in each of the
20 Company's state retail jurisdictions.

⁵ *In re PacifiCorp*, 143 FERC ¶ 61,162 (May 23, 2013) (letter order approving settlement agreement establishing formula rate).

1 **Q. Please explain how network upgrade cost allocation works under the OATT.**

2 A. In accordance with its OATT, when PacifiCorp receives a request for generation
3 interconnection or transmission service, the Company completes studies to determine
4 what new facilities or upgrades to existing facilities are required to accommodate the
5 request. The studies identify the facilities and upgrades required and classify the
6 asset additions required to support the service into two categories: direct assigned or
7 network upgrade. Direct assigned assets are those assets that only benefit or are used
8 solely by the customer requesting generator interconnection or transmission service.
9 Those costs are directly assigned and paid for by that customer and will not be
10 included in either the Company's ATRR or retail rate base. Network upgrades, on the
11 other hand, are those assets that benefit all customers using the transmission system.
12 Costs associated with network upgrades are investments by the transmission provider
13 and are included in PacifiCorp's ATRR⁶ and retail rate base.

14 **V. GOSHEN TO SUGARMILL TO RIGBY 161 KV TRANSMISSION LINE**
15 **PROJECT**

16 **Q. Please describe the investment for the Goshen to Sugarmill to Rigby 161 kV**
17 **Transmission Line Project.**

18 A. The Goshen to Sugarmill to Rigby 161 kV Transmission Line Project constructs
19 approximately 44 miles of new transmission lines from the Goshen to Sugarmill and
20 Sugarmill to Rigby substations located in the southeast Idaho area. Substation

⁸ For generation interconnection customers, those customers may be required to pay the initial cost of network upgrades, subject to refund through credits to invoiced charges for transmission service and full refund of any remaining amounts after 20 years. See Section 11.4 of PacifiCorp's Standard Large Generator Interconnection Agreement (OATT Attachment N, Appendix 6 and available at http://www.oasis.oati.com/woa/docs/PPW/PPWdocs/20190601_OATTMASTER.pdf); see also Standardization of Generator Interconnection Agreements and Procedures, Order No. 2003-B, 109 FERC ¶ 61,287 (Dec. 20, 2004).

1 expansion will be required at Goshen, Sugarmill, and Rigby substations to
2 accommodate the new 161 kV positions and associated structures and equipment, as
3 shown on the map attached in Exhibit PAC/601. The project consists of two
4 sequences of work. The first work sequence, completed in 2020, was to construct
5 approximately 24 miles of the new Goshen to Sugarmill #2 161 kV transmission line
6 and perform the required substation construction at Goshen and Sugarmill substations
7 to terminate the new transmission line at both ends. This first work sequence was
8 included and approved for recovery in the Company's last rate case proceeding,
9 docket UE 374.⁷

10 The second work sequence consists of constructing approximately 20 miles of
11 the new Sugarmill to Rigby #2 161 kV line and performing the required substation
12 construction at Goshen and Sugarmill substations to terminate the new transmission
13 line at both ends of the line.

14 As part of this project, PacifiCorp entered into a joint ownership agreement
15 with Idaho Falls Power to construct 12 miles of new 161 kV shared transmission line
16 from the corner of Lincoln Road and Hitt Road to Idaho Falls Power's future Paine
17 Substation. Idaho Falls Power had much of this line already permitted and was able
18 to secure final permits with the assistance of PacifiCorp while reducing time and
19 costs required for PacifiCorp to secure permitting for a separate line. PacifiCorp will
20 own and pay 51 percent of this line segment. Idaho Falls Power completed this
21 portion of the line in December 2021. PacifiCorp expects to complete the line to
22 Rigby substation by July 2022.

⁷ *In the matter of PacifiCorp, dba Pacific Power, Request for a General Rate Revision, Docket No. UE 374, Order No. 20-473 (Dec. 18, 2020).*

1 **Q. Please explain why this investment in the Goshen to Sugarmill to Rigby 161 kV**
2 **Transmission Line Project is needed and beneficial.**

3 A. The need for the Goshen to Sugarmill to Rigby 161 kV line was identified in the 2016
4 Goshen Area Planning Study to address projected overloads on the Goshen to
5 Sugarmill 161 kV line and Goshen to Rigby 161 kV line, in addition to low voltage at
6 Rigby and Sugarmill substations that manifest under heavy loading conditions.
7 Projected peak summer load conditions in 2021 in the Rigby-Sugarmill area indicate
8 that under normal operating conditions (N-0) the Goshen to Sugarmill 161 kV line
9 was expected to load to 100 percent of its continuous rating of 201 megavolt amperes
10 (MVA) and the Rigby and Sugarmill substations 161 kV bus voltage is expected to
11 reach its minimum limit of 0.95 per unit. Additionally, the projected load growth
12 exacerbates several existing N-1 conditions in the area. Based on 2021 load, loss of
13 the Goshen to Sugarmill 161 kV line causes the Goshen to Rigby 161 kV line to
14 overload to 179 percent of its four-hour emergency rating and can result in
15 excessively low voltage down to 0.68 per unit in the Rigby-Sugarmill area. The loss
16 of the Goshen to Rigby 161 kV line can cause the Goshen to Sugarmill 161 kV line to
17 overload to 111 percent of its four-hour emergency rating of 255 MVA, overload to
18 102 percent of its 30-minute emergency rating of 279 MVA and can cause low
19 voltage down to 0.88 per unit at Rigby substation. The Goshen to Sugarmill 161 kV
20 line and Goshen to Rigby 161 kV line are operated radially during summer heavy
21 loading periods to mitigate the risk of violating NERC Standard TPL-001-4 category
22 P0 (N-0), P1 (N-1) and P6 (N-1-1) performance requirements due to transmission
23 capacity deficiencies in the area. Operating radially puts approximately 150

1 megawatts (MW) of load at risk for N-1 loss of either the Goshen to Sugarmill
2 161 kV line or the Goshen to Rigby 161 kV line and 300 MW at risk for N-1-1 loss of
3 any two transmission lines.

4 The new Goshen to Sugarmill to Rigby 161 kV line will increase load serving
5 capacity in the Rigby to Sugarmill area by 250 MVA that will allow the transmission
6 lines between Goshen, Sugarmill, and Rigby substations to operate in a normal loop
7 configuration and eliminate N-1 thermal overload and low voltage issues on the
8 remaining transmission line and substation. Benefits also include elimination of the
9 N-0 overload risk, improved load service reliability under N-1 conditions, and
10 resolution of most N-1-1 issues present in the area.

11 **Q. Did PacifiCorp consider alternatives to investing in the Goshen to Sugarmill to**
12 **Rigby 161 kV Transmission Line?**

13 A. Yes. The first alternative in lieu of the Goshen to Sugarmill to Rigby 161 kV line that
14 PacifiCorp considered was a project to construct a new approximately 35-mile-long
15 Goshen to Rigby 345 kV line with 1272 aluminum conductor steel-reinforced
16 (ACSR) cable and add a new 450 MVA capacity or larger 345/161 kV transformer at
17 the Rigby substation. Work involved expanding both the Goshen and Rigby
18 substation yards to accommodate the new facilities consisting of at least two 345 kV
19 breakers at Goshen, one 345 kV breaker at Rigby and at least two 161 kV breakers at
20 the Rigby 161 kV substation. This alternative was rejected since the estimated cost of
21 the project was about \$17.0 million higher than the chosen project to construct the
22 new Goshen to Sugarmill to Rigby 161 kV transmission line. The alternative was
23 estimated to be \$57.7 million.

1 A second alternative considered was to construct an approximately 61-mile-
2 long Antelope to Rigby 161 kV transmission line with 1272 ACSR cable or larger.
3 Work involved expanding both the Antelope and Rigby substation yards to
4 accommodate the new facilities consisting of at least two 161 kV breakers at Antelope
5 and at least two 161 kV breakers at Rigby. A new 161 kV line from Antelope would
6 provide a new source into the Rigby to Sugarmill area apart from Goshen substation;
7 however, planning studies indicated that by adding the Antelope to Rigby 161 kV
8 line, the N-1 loss of the Goshen to Sugarmill 161 kV line would still cause thermal
9 overload and low voltage issues in the area and that load shedding and radialization of
10 the Rigby to Sugarmill area would still be required. This alternative was rejected
11 since the estimated cost of the project was about \$8.0 million higher than the new
12 Goshen to Sugarmill to Rigby 161 kV transmission line and that a new Antelope to
13 Rigby 161 kV transmission line does not resolve the loading and voltage issues in the
14 Rigby to Sugarmill area. The alternative was estimated to be \$48.0 million.

15 A third alternative considered was to construct approximately 22.8 miles of a
16 161 kV transmission line from the Meadow Creek wind farm substation to Sugarmill
17 and Rigby substations to create a looped transmission source back to Goshen
18 substation. Work involved constructing approximately 5.9 miles of new single circuit
19 161 kV transmission line from Meadow Creek to a new tap location, using the
20 existing right of way to construct 4.5 miles of double-circuit line from the new tap
21 location to Sugarmill substation, and construct 12.4 miles of new single-circuit
22 161 kV line from the new tap location to Rigby substation. Work also included
23 converting Meadow Creek's 161 kV substation yard into a new three breaker ring

1 bus, installation of at least two 161 kV breakers at Sugarmill and Rigby substations,
2 rebuilding the Goshen to Wolverine Creek to Jolly Hills to Meadow Creek 161 kV
3 line with 1557 ACSR cable (approximately 32.4 miles), rebuilding the remaining
4 three miles of 795 all-aluminum conductor (AAC) cable on the Goshen to Sugarmill
5 161 kV line, and adding a 161 kV bus tie breaker at Rigby to facilitate sectionalizing
6 post N-1. Currently, the Goshen wind farms are radial from the Goshen 161 kV
7 substation. Once looped through the Rigby and Sugarmill substations, a detailed
8 voltage control study would be required to coordinate the wind farms and shunt
9 devices in the area. Since the existing radial wind farm line is owned and operated by
10 third parties, an agreement to use or buy the facilities would need to be negotiated.
11 This alternative was rejected since the estimated cost of the project was about
12 \$8.2 million higher than the new Goshen to Sugarmill to Rigby 161 kV transmission
13 line and required significant coordination with third parties to deliver the project. The
14 alternative was estimated to be \$48.5 million.

15 The last alternative considered was to loop the existing Goshen to Jefferson
16 161 kV transmission line in and out of the Bonneville substation. Work involved
17 converting the Bonneville substation into a 161 kV breaker and one-half
18 configuration, constructing an approximately 27-mile-long 161 kV line from
19 Bonneville to Rigby substation with at least 1557 ACSR cable. Work also involved
20 expanding both the Rigby substation yards to accommodate a new 161 kV line
21 position consisting of at least two 161 kV breakers at the Rigby substation. Adding
22 this new Bonneville to Rigby 161 kV line does not improve N-1 and N-1-1 issues in
23 the area and therefore is not considered as a viable alternative. The estimate for this

1 project was \$33.2 million. Additional projects would be required to address the N-1
2 and N-1-1 issues. These projects include reconductoring 32 miles of Goshen to
3 Rigby 161 kV line, reconductoring 16 miles of Sugarmill to Rigby 161 kV line, and
4 reconductoring 3.5 miles of 795 AAC cable on existing Goshen to Sugarmill
5 161 kV line. Additionally, a new Goshen to Sugarmill 161 kV line would be required
6 to mitigate the low voltage and voltage swings caused by the loss of the existing
7 Goshen to Sugarmill 161 kV line. The estimate to reductor these lines was
8 \$6.6 million and the estimate to construct a new Goshen to Sugarmill 161 kV line was
9 \$13.3 million. This alternative was rejected since the estimate for the new Bonneville
10 to Rigby 161 kV line and supporting projects was about \$12.7 million higher than the
11 recommended new Goshen to Sugarmill to Rigby 161 kV transmission line project.
12 The alternative was estimated to be \$53.1 million.

13 VI. JORDANELLE TO MIDWAY 138 KV TRANSMISSION LINE PROJECT

- 14 **Q. Please describe the investment for the Jordanelle to Midway 138 kV**
15 **Transmission Line Project.**
- 16 **A.** The Jordanelle to Midway 138 kV transmission line project constructed 9 miles of
17 138 kV transmission line between the Midway and Jordanelle substations in
18 northwestern Wasatch County Utah. This project also included installation of two
19 138 kV breakers at Midway substation; the addition of 18 miles of optical ground
20 wire between Hale and Midway substation; updates of the Naughton remedial action
21 scheme (RAS); addition of a voltage transformer in Silver Creek and Hale
22 substations; and protection and control upgrades at affected substations. The line
23 siting partially followed Heber Light and Power's (HLP) existing 46 kV line across

1 the Heber Valley. The structures are owned by PacifiCorp and, for portions, HLP will
2 have circuits and other facilities attached to PacifiCorp structures. HLP's paid
3 contributions in aid of construction for their facilities and Midway City's paid
4 contribution for excess costs to underground a portion of the line.

5 **Q. Please explain why this investment in the Jordanelle to Midway 138 kV**
6 **Transmission Line Project is needed and beneficial.**

7 A. In 2011, as part of ongoing contingency and growth studies it was identified that an
8 outage of the Cottonwood to Snyderville 138 kV line creates a voltage collapse of the
9 looped Summit and Wasatch County system when the area load is above 190 MW.
10 The same outage creates voltage below the transmission voltage guideline of
11 .90 when loading is above 175 MW. In 2020, the area was projected to be above
12 190 MW for 156 hours and above 175 MW for 620 hours. In addition, Utah
13 Associated Municipal Power Systems (UAMPS) on behalf of HLP submitted a load
14 forecast that put them above the system capability under N-1 conditions (loss of the
15 Hale to Midway 138 kV line) by the year 2019 (approximately 42.9 MW of HLP
16 load). At the time HLP was served at 46 kV from the Midway substation. An official
17 request for a 138 kV delivery point was made. HLP plans to install a 138-46 kV
18 transformer to provide redundancy to their 46 kV system and split HLP's 46 kV load
19 between the two sources.

1 **Q. Did PacifiCorp consider alternatives to investing in the Jordanelle to Midway**
2 **138 kV Transmission Line?**

3 A. Yes, an alternative project was to construct a second 138 kV 19-mile line from Hale
4 substation in Utah County to Midway substation and install a second Midway
5 138-46 kV 75 MVA transformer. Although a second line from Hale and second
6 transformer at Midway would raise the system radialization limit to 225 MW, the
7 138 kV voltage at the Snyderville substation during the loss of the Cottonwood to
8 Snyderville 138 kV line is the limiting factor. This alternative was rejected due to the
9 estimated cost coming in higher than the preferred option and the resulting
10 radialization limit was 20 MW lower than the preferred option. In addition, the
11 construction and permitting of a new 138 kV line through Provo Canyon was deemed
12 to be more difficult.

13 **VII. CONCLUSION**

14 **Q. Please summarize your recommendation to the Commission.**

15 A. I recommend that the Commission determine that the projects stated above will
16 provide benefits to Oregon customers and are therefore prudent and in the public
17 interest.

18 **Q. Does this conclude your direct testimony?**

19 A. Yes.

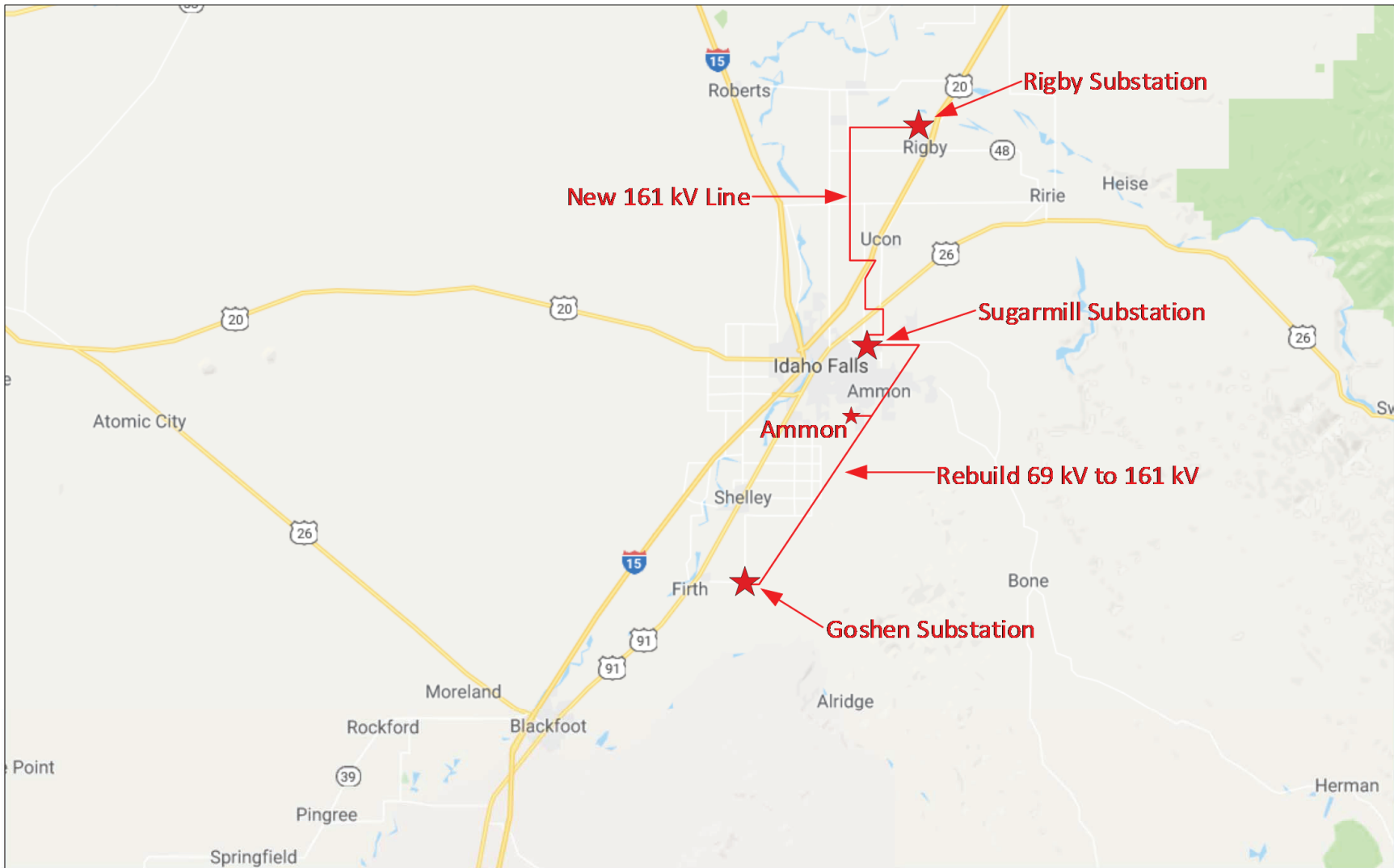
**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

**Exhibit Accompanying Direct Testimony of Richard A. Vail
Goshen to Sugarmill to Rigby 161 kV Transmission Line Project**

March 2022

Goshen-Sugarmill-Rigby 161 KV Transmission Line Project Area



Docket No. UE 399
Exhibit PAC/602
Witness: Richard A. Vail

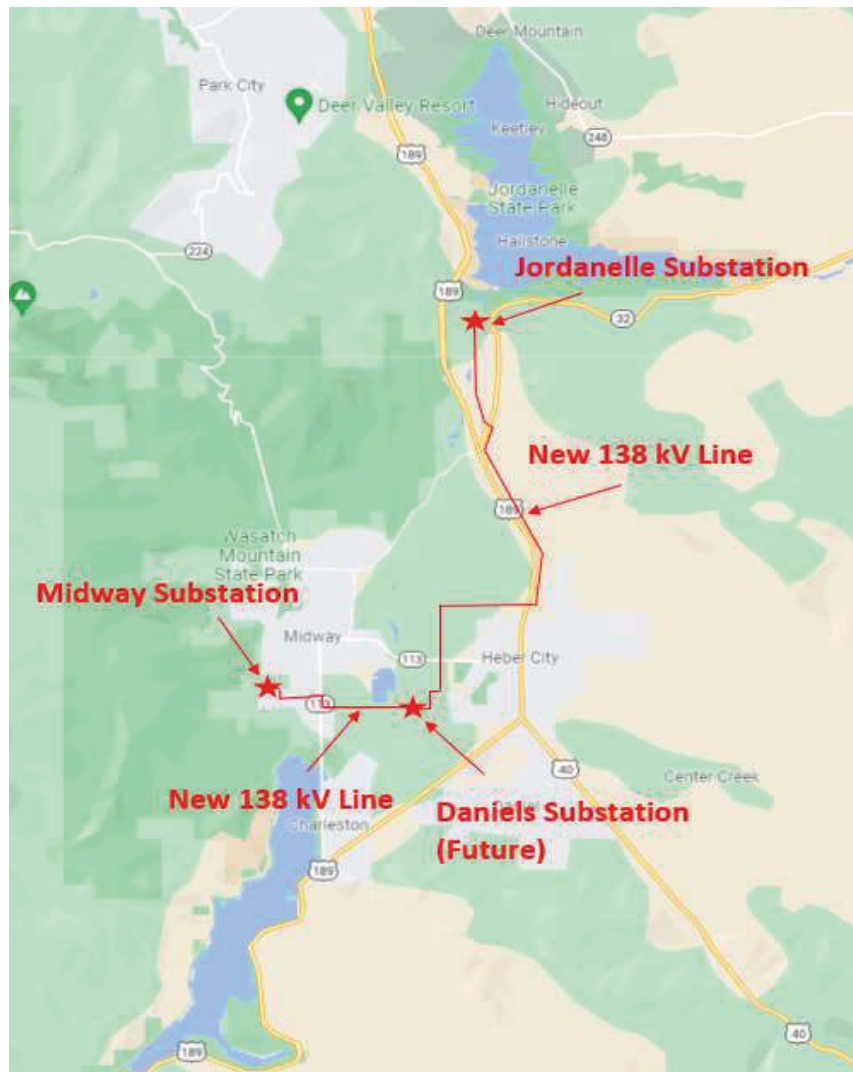
**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

**Exhibit Accompanying Direct Testimony of Richard A. Vail
Jordanelle to Midway 138 kV Transmission Line Project**

March 2022

Jordanelle-Daniels-Midway 138 KV Transmission Line Project Area



**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities

EXHIBIT NEWSUN/601

PacifiCorp “Executed but Not In Service” Interconnection Queue

as of 5/13/22 (accessed on 5/24/22).

As of: 5/13/22 Archive: These projects are not considered as part of the generation interconnection queue Executed, but NOT In Service

Q#	Request Date	Request Status	Company Name	Service Type	Application Rules	Qualifying Facility Status	Max MW Output		County	ST	Region	Location of Generating Facility	Location of Interconnection	In-Service Date (Commercial Operations)		Feasibility Study / Fast Track	System Impact Study	Facilities Study	Optional Study	Schedule Deviation	Request Status Explanation
							S	W						Customer Requested Commercial Operations Date	Agreed to Commercial Operations Date						
251	12/23/08	In Progress	Cedar Creek Wind, LLC	ER	LGI	NO	151.8	151.8	Bingham	ID	PACW	Goshen-Sugar Mill Transmission line	7/1/10	6/24/22	Available	Available	Available			IA signed 3/17/24	
409	12/26/12	In Progress	Boswell Wind Project 1, LLC	ER	LGI	NO	320	320	Albany	WY	PACE	Freezeout substation	9/30/14	12/31/24	Available	Available	Available			IA signed 6/22/16, suspended 1/9/2020	
443	10/16/12	Suspended	Ponderosa Solar, LLC	ER	LGI	NO	34.56	34.56	Crook	OR	PACW	Ponderosa substation	6/30/15	12/1/20	Available	Available	Available			IA signed June 4, 2015	
524	10/8/13	In Progress	OREG 6, LLC	ER	SGI	NO	6	6	Salt Lake	UT	PACE	Terminal - Tooele 46kV	11/30/15	7/1/23	Available	Available	Available			IA signed March 18, 2015	
547	2/10/14	In Progress	Chopin Wind, LLC	NR	SGI	QF	18	18	Umatilla	OR	PACW	Weston P substation at 69 kV, on the line Athena side of the NO switch	11/30/15	*10/15/2014	Available	Available	Available			IA signed 12/19/2014, *COD (10 MW) 10/15/16, (8 MW) 8/1/21	
558	3/18/14	Suspended	US Magnesium, LLC	NR	LGI	QF	19	21	Tooele	UT	PACE	Rowley substation	3/31/15	11/15/21	Available	Available	Available			IA signed March 27, 2015, Suspended 7/8/2020	
632	11/22/14	In Progress	Thermo No. 1 BE-01, LLC	NR	SGI	NO	2.99	2.99	Beaver	UT	PACE	Circuit SML21 out of South Milford substation	10/3/15	5/31/17	Available	Available	Available			IA signed 11/30/15	
634	11/20/14	In Progress	Fremont Solar, LLC	ER	LGI	NO	99	99	Beaver	UT	PACE	Parowan-Sigurd line	12/31/16	9/25/23	Available	Available	Available			IA signed 9/9/16, Suspended 10/31/16	
636	12/3/14	In Progress	Rush Lake Solar, LLC	ER	LGI	NO	99	99	Iron	UT	PACE	Parowan-West Cedar line	12/31/16	9/29/23	Available	Available	Available			IA signed 9/9/16, Suspended 10/31/16	
642	2/9/15	In Progress	Parowan Solar, LLC	ER	LGI	NO	58	58	Iron	UT	PACE	Parowan substation	10/4/16	12/31/24	Available	Available	Available			IA signed 9/8/16	
650	4/7/15	In Progress	Orchard Windfarm 1, LLC	NR	OLGI	QF	10	10	Umatilla	OR	PACW	Hinkle substation	12/30/16	12/18/20	Available	Available	Available			IA signed 5/31/16	
651	4/7/15	In Progress	Orchard Windfarm 2, LLC	NR	OLGI	QF	10	10	Umatilla	OR	PACW	Hinkle substation	12/30/16	12/18/20	Available	Available	Available			IA signed 5/31/16	
652	4/7/15	In Progress	Orchard Windfarm 3, LLC	NR	OLGI	QF	10	10	Umatilla	OR	PACW	Hinkle substation	12/30/16	12/18/20	Available	Available	Available			IA signed 5/31/16	
653	4/7/15	In Progress	Orchard Windfarm 4, LLC	NR	OLGI	QF	10	10	Umatilla	OR	PACW	Hinkle substation	12/30/16	12/18/20	Available	Available	Available			IA signed 5/31/16	
666	5/5/15	In Progress	Sunburst Energy, LLC	NR	OLGI	QF	1.98	1.98	Umatilla	OR	PACW	Circuit SW406, Pilot Rock City, out of Pilot Rock substation	12/31/15	12/31/22	Available	Available	Available			IA signed 3/14/16	
687	7/28/15	In Progress	Swan Lake North Hydro, LLC	ER	LGI	NO	415.8	415.8	Klamath	OR	PACW	PacificCorp's Main 500 kV substation	12/31/22	11/1/25	Available	Available	Available			IA executed 10/31/19	
719	10/12/15	In Progress	Cedar Springs Transmission LLC	ER	LGI	NO	350	350	Converse	WY	PACE	Yellowcreek - Antelope Mine line	1/21/17	1/15/25	Available	Available	Available			IA executed 9/24/19	
715	10/29/15	In Progress	Uinta Wind Energy, LLC	ER	LGI	NO	120	120	Uinta	WY	PACE	Green Compression-Railroad transmission line	7/1/17	7/1/25	Available	Available	Available			IA executed 9/24/18	
719	11/11/15	In Progress	Two Rivers Wind, LLC	NR	LGI	QF	280	280	Albany	WY	PACE	Freezeout substation	12/31/18	2/1/25	Available	Available	Available			IA executed 6/26/19	
721	11/14/15	In Progress	Skycol, LLC	NR	OLGI	QF	55	55	Klamath	OR	PACW	Klamath Falls-Malin transmission line	6/30/17	4/30/22	Available	Available	Available			IA signed 6/5/17	
731	3/4/16	In Progress	Prineville Solar Energy LLC	ER	LGI	NO	55	55	Crook	OR	PACW	Baldwin Rd - Ponderosa transmission line	7/1/18	TBD	Available	Available	Available			IA signed 11/5/18	
734	3/18/16	Suspended	Aurora Solar, LLC	ER	LGI	NO	62.3	62.3	Crook	OR	PACW	Ponderosa substation	4/30/17	11/1/22	Available	Available	Available			IA signed 9/25/17, Suspended 8/13/20	
741	5/6/16	In Progress	Sparrow Solar, LLC	NR	OLGI	QF	40	40	Klamath	OR	PACW	Klamath Falls-Lone Pine 230 kV transmission line	9/2/18	9/1/24	Available	Available	Available			IA signed 12/5/17	
751	5/25/16	In Progress	Capitol Solar, LLC	ER	LGI	NO	40	40	Box Elder	UT	PACE	Lampo substation	12/31/18	7/31/22	Available	Available	Available			IA signed 3/6/18	
753	5/25/16	In Progress	Rocket Solar, LLC	ER	LGI	NO	80	80	Box Elder	UT	PACE	Lampo substation	12/31/18	7/31/22	Available	Available	Available			IA signed 3/6/18	
754	5/25/16	In Progress	Steel Solar, LLC	ER	LGI	NO	80	80	Box Elder	UT	PACE	Whelon-Nucor transmission line	12/31/18	12/16/22	Available	Available	Available			IA signed 6/28/18	
763	6/22/16	In Progress	Appaloosa Solar 1, LLC	ER	LGI	NO	200	200	Iron	UT	PACE	Three Peaks substation	11/15/18	7/14/23	Available	Available	Available			IA executed 1/7/19	
764	6/22/16	In Progress	Graphite Solar 1, LLC	ER	LGI	NO	80	80	Carbon	UT	PACE	Mathington substation	12/1/17	11/17/21	Available	Available	Available			IA signed 9/13/18	
777	7/13/16	In Progress	Hornshadow, LLC	ER	LGI	NO	100	100	Emery	UT	PACE	Emery substation	12/31/18	8/31/24	Available	Available	Available			IA executed 2/19/19	
778	7/13/16	In Progress	Green River Solar 1, LLC	ER	LGI	NO	200	200	Emery	UT	PACE	Emery-Sigurd #2 line	12/31/18	7/31/24	Available	Available	Available			IA signed 2/20/19, suspended 2/21/19	
781	8/1/16	In Progress	Elektron Solar, LLC	ER	LGI	NO	80	80	Tooele	UT	PACE	Cramer Flat substation	12/31/18	6/30/22	Available	Available	Available			IA signed 10/2/18	
783	8/3/16	In Progress	Dinosolar, LLC	ER	LGI	NO	30	30	Natrona	WY	PACE	Bar Num substation	6/30/20	12/15/24	Available	Available	Available			IA executed 2/12/20	
784	8/4/16	In Progress	Dinosolar, LLC	NR	LGI	NO	80	80	Natrona	WY	PACE	Casper substation	12/30/18	12/31/24	Available	Available	Available			IA executed 5/22/19	
785	8/4/16	In Progress	Antiline Wind, LLC	ER	LGI	NO	100	100	Natrona	WY	PACE	Claim Jumper - Casper 230 kV transmission line	12/31/19	12/31/24	Available	Available	Available			IA executed 9/20/19	
786	8/4/16	Suspended	Echo Divide Wind, LLC	ER	LGI	NO	300	300	Summit	UT	PACE	Evamston-Amschutz transmission line	12/31/18	4/15/22	Available	Available	Available			IA executed 12/24/18, suspended 9/29/20	
787	8/8/16	In Progress	Green River Solar 1, LLC	ER	LGI	NO	200	200	Emery	UT	PACE	Emery-Sigurd #2 line	11/15/18	8/15/24	Available	Available	Available			IA executed 5/13/19	
788	8/8/16	In Progress	Green River Solar II, LLC	ER	LGI	NO	200	200	Emery	UT	PACE	Emery-Sigurd #2 line	11/15/18	10/25/24	Available	Available	Available			IA executed 5/13/19	
789	8/8/16	Suspended	Fresh Air Energy II, LLC	NR	LGI	QF	74.9	74.9	Fremont	WY	PACE	Riverton-Thermopolis transmission line	9/30/19	10/20/23	Available	Available	Available			IA executed 10/8/20, suspended 6/17/21	
792	9/1/16	Suspended	RC Solar Energy LLC	NR	LGI	NO	80	80	Carbon	UT	PACE	Mathington substation	12/1/19	11/2/21	Available	Available	Available			IA executed 3/7/19, Suspended 6/28/19	
799	9/20/16	In Progress	Steel Solar, LLC	ER	LGI	NO	67	67	Box Elder	UT	PACE	Whelon - Nucor transmission line	6/30/19	12/14/23	Available	Available	Available			IA executed 9/20/19	
801	9/20/16	In Progress	Dinosolar, LLC	ER	LGI	NO	80	80	Natrona	WY	PACE	Bar Num substation	6/30/19	12/15/24	Available	Available	Available			IA executed 2/12/20	
802	9/20/16	In Progress	Dinosolar, LLC	ER	LGI	NO	50	50	Natrona	WY	PACE	Bar Num substation	6/30/19	12/15/24	Available	Available	Available			IA executed 2/12/20	
805	9/30/16	In Progress	Glen Canyon Solar A, LLC	ER	LGI	NO	95	95	Kane	UT	PACE	Sigurd-Glen Canyon transmission line	12/19/19	11/30/23	Available	Available	Available			IA executed 4/8/20	
807	9/30/16	In Progress	Elk Mountain Wind, LLC	ER	LGI	NO	75.9	75.9	Carbon	WY	PACE	Standpipe substation	8/31/19	12/31/24	Available	Available	Available			IA executed 2/20/20	
815	11/7/16	In Progress	Uinta Wind Energy LLC	ER	SGI	NO	20	20	Emery	UT	PACE	Moore substation	2/1/20	11/30/23	Available	Available	Available			IA executed 5/8/19	
820	11/15/16	Suspended	PacificCorp	ER	LGI	NO	48	48	Beaver	UT	PACE	South Milford substation	2/22/18	11/15/21	Available	Available	Available			IA executed 11/7/19, Suspended 3/20/2020	
821	11/15/16	Suspended	PacificCorp	ER	LGI	NO	87	87	Carbon	UT	PACE	Mathington substation	2/22/18	9/15/23	Available	Available	Available			IA executed 1/21/2020, Suspended 3/20/2020	
822	11/15/16	In Progress	PacificCorp	ER	LGI	NO	30	30	Sanpete	UT	PACE	Gunnison-Sigurd #1 transmission line	2/22/18	10/1/26	Available	Available	Available			IA executed 10/17/19	
823	11/15/16	Suspended	PacificCorp	ER	LGI	NO	178	178	Emery	UT	PACE	Emery substation	6/30/19	2/1/27	Available	Available	Available			IA executed 1/21/2020, Suspended 3/20/2020	
824	11/14/16	Suspended	Grass Butte Solar, LLC	ER	LGI	NO	40	40	Crook	OR	PACW	Ponderosa substation	12/31/18	TBD	Available	Available	Available			IA executed 1/21/2020, Suspended 10/9/2020	
825	11/21/16	In Progress	Blue Marmot V LLC	ER	SGI	NO	10	10	Lake	OR	PACW	Bullard substation	11/30/19	6/30/22	Available	Available	Available			IA executed 10/1/19	
826	11/21/16	In Progress	Blue Marmot VI LLC	ER	SGI	NO	10	10	Lake	OR	PACW	Bullard substation	11/30/19	6/30/22	Available	Available	Available			IA executed 10/1/19	
827	11/21/16	In Progress	Blue Marmot VII LLC	ER	SGI	NO	10	10	Lake	OR	PACW	Bullard substation	11/30/19	6/30/22	Available	Available	Available			IA executed 10/1/19	
829	11/21/16	In Progress	Blue Marmot IX LLC	ER	SGI	NO	10	10	Lake	OR	PACW	Bullard substation	11/30/19	6/30/22	Available	Available	Available			IA executed 10/1/19	
830	11/21/16	In Progress	Blue Marmot XI LLC	ER	SGI	NO	10	10	Lake	OR	PACW	Bullard substation	11/30/19	6/30/22	Available	Available	Available			IA executed 10/1/19	
835	12/5/16	In Progress	Rock Creek Wind, LLC	ER	LGI	NO	190	190	Carbon	WY	PACE	Footo Creek substation	10/1/20	12/15/24	Available	Available	Available			IA executed 3/25/2020	
836	12/5/16	In Progress	Rock Creek Wind, LLC	ER	LGI	NO	400	400	Carbon	WY	PACE	Aeolus substation	10/1/23	12/15/24	Available	Available	Available			IA executed 4/26/19	
846	1/10/17	In Progress	Horseshoe Solar, LLC	ER	LGI	NO	75	75	Tooele	UT	PACE	Horseshoe substation	6/30/19	7/31/22	Available	Available	Available			IA executed 3/25/2020	
849	2/6/17	Suspended	Power Development Company, LLC	NR	OLGI	QF	100	100	Klamath	OR	PACW	Klamath Falls-Malin transmission line	12/31/19	12/31/23	Available	Available	Available			IA executed 5/13/19, suspended 1/4/22	
862	4/6/17	In Progress	Rocket Solar, LLC	ER	LGI	NO	45	45	Box Elder	UT	PACE	Lampo substation	6/30/19	12/15/23	Available	Available	Available			IA executed 2/11/20	
866	4/17/17	In Progress	Wyoming Machinery Company	ER	SGI	NO	0.3	0.3													

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities

EXHIBIT NEWSUN/602

PacifiCorp 2020 All-Source RFP Final Shortlist Presentation,

Docket No. UM 2059 (July 30, 2021).



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

July 30, 2021

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398

Attn: Filing Center

RE: UM 2059 – Final Shortlist for the 2020 All Source Request for Proposals and Sensitivity Analysis

PacifiCorp, d/b/a Pacific Power (PacifiCorp) submits the attached highly confidential and redacted presentation covering the Final Shortlist (FSL) for the 2020 All-source RFP and sensitivity analyses as revised and provided to the Independent Evaluator on July 20, 2021. The presentation is an update to the original FSL presentation provided June 8, 2021. Highly confidential information is provided subject to modified protective order 21-202.

Please direct informal inquiries regarding this filing to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

A handwritten signature in cursive script that reads "Shelley McCoy".

Shelley McCoy
Director, Regulation

CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's **Final Shortlist for the 2020 All Source Request for Proposals and Sensitivity Analysis Presentation** on the parties listed below via electronic mail and/or or overnight delivery in compliance with OAR 860-001-0180.


**Service List
UM 2059**

<p>MATTHEW MULDOON (C) (HC) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM OR 97308-1088 matt.muldoon@puc.oregon.gov</p>	<p>JACK STODDARD MORGAN LEWIS & BOCKIUS ONE MARKET SPEAR STREET TOWER SAN FRANCISCO CA 94105 fjackson.stoddard@morganlewis.com</p>
<p>ALLIANCE OF WESTERN ENERGY CONSUMERS</p>	
<p>BRENT COLEMAN (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY, SUITE 450 PORTLAND OR 97201 blc@dvclaw.com</p>	<p>BRADLEY MULLINS (C) MOUNTAIN WEST ANALYTICS 1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 brmullins@mwanalytics.com</p>
<p>TYLER C PEPPLER (C) DAVISON VAN CLEVE, PC 1750 SW HARBOR WAY STE 450 PORTLAND OR 97201 tcp@dvclaw.com</p>	
<p>AVANGRID RENEWABLES</p>	
<p>JIMMY HULETT 1125 NW COUCH ST STE 700 PORTLAND OR 97209 jimmy.hulett@avangrid.com</p>	<p>ERIN KESTER AVANGRID RENEWABLES, LLC 1125 NW COUCH STE 700 PORTLAND OR 97209 erin.kester@avangrid.com</p>
<p>INNERGEX</p>	
<p>SEAN YOVAN INNERGEX syovan@innergex.com</p>	
<p>INTERMOUNTAIN WIND</p>	
<p>DAVID D'ALESSANDRO STINSON LLP 1775 PENNSYLVANIA AVE. NW WASHINGTON DC 20006 david.dalessandro@stinson.com</p>	<p>PAUL MARTIN INTERMOUNTAIN WIND PO BOX 353 BOULDER CO 80306 paul@intermountainwindllc.com</p>

<p>HARVEY REITER STINSON LLP 1775 PENNSYLVANIA AVE. NW WASHINGTON DC 20006 harvey.reiter@stinson.com</p>	
<p>NIPPC</p>	
<p>JONI L SLIGER (C) SANGER LAW PC 1041 SE 58TH PLACE PORTLAND OR 97215 joni@sanger-law.com</p>	<p>SPENCER GRAY NIPPC sgray@nippc.org</p>
<p>IRION A SANGER (C) SANGER LAW PC 1041 SE 58TH PLACE PORTLAND OR 97215 irion@sanger-law.com</p>	
<p>OREGON CITIZENS UTILITY BOARD</p>	
<p>OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY, STE 400 PORTLAND OR 97205 dockets@oregoncub.org</p>	<p>MICHAEL GOETZ (C) OREGON CITIZENS' UTILITY BOARD 610 SW BROADWAY STE 400 PORTLAND OR 97205 mike@oregoncub.org</p>
<p>SUDESHNA PAL (C) OREGON CITIZENS UTILITY BOARD sudeshna@oregoncub.org</p>	
<p>PACIFICORP</p>	
<p>PACIFICORP, DBA PACIFIC POWER 825 NE MULTNOMAH ST, STE 2000 PORTLAND OR 97232 oregondockets@pacificorp.com</p>	<p>CARLA SCARSELLA (C) PACIFIC POWER 825 MULTNOMAH STREET STE 2000 PORTLAND OR 97232 carla.scarsella@pacificorp.com</p>
<p>RENEWABLE NORTHWEST</p>	
<p>RENEWABLE NORTHWEST 421 SW 6TH AVE., STE. 975 PORTLAND OR 97204 dockets@renewablenw.org</p>	<p>MAX GREENE (C) RENEWABLE NORTHWEST 421 SW 6TH AVE STE 975 PORTLAND OR 97204 max@renewablenw.org</p>

STAFF	
ROSE ANDERSON (C) (HC) PUBLIC UTILITY COMMISSION OF OREGON PO BOX 1088 SALEM OR 97308 rose.anderson@puc.oregon.gov	JOHANNA RIEMENSCHNEIDER (C) (HC) PUC STAFF - DEPARTMENT OF JUSTICE BUSINESS ACTIVITIES SECTION 1162 COURT ST NE SALEM OR 97301-4796 johanna.riemenschneider@doj.state.or.us
SWAN LAKE NORTH HYDRO LLC	
NATHAN SANDVIG SWAN LAKE NORTH HYDRO LLC 404 WYMAN STREET WALTHAM MA 02451 nathan.sandvig@nationalgrid.com	ERIK STEIMLE SWAN LAKE NORTH HYDRO LLC 220 NW 8TH AVE PORTLAND OR 97209 erik@ryedevelopment.com
CHRIS ZENTZ VAN NESS FELDMAN LLP cdz@vnf.com	

Dated this 30th day of July, 2021.


Katie Savarin
Coordinator, Regulatory Operations



2020 All Source RFP Final Short List Revised July 20, 2021



PUBLIC VERSION



RFP Modeling Revisions

Issues with the previously filed final shortlist (FSL) analysis were identified as a result of a verification process initiated after developing responses to questions ask by the independent evaluators:

- Net delivery costs and indicative generation values were revised to reflect corrections in annual generation and net capacity factors:
 - Embedded text (rather than values) in provided generation profiles resulted in the omission of hours with no generation in some bidders' 8760 profiles.
 - Solar bids that provided net solar and storage 8760 profiles, instead of the requested solar output.
- Failed uploads to the model resulted in use of proxy resource profiles, rather than bid profiles in some instances.
- The modeled location of one bid was corrected from Utah North to Wyoming East.
- PacifiCorp repeated and expanded its final shortlist analysis after incorporating and verifying these changes.



Key Findings

- FSL bid selections remain unchanged.
- Modeling changes reduce the value of resources in eastern Wyoming; however, the eastern Wyoming bids continue to provide customer benefits.
- Bid selections by price-policy show minimal changes.
 - The low gas, no CO₂ bid-portfolio no longer includes Steel Solar
- After revisions, the LN Bid portfolio appears to be low cost under the base price-policy scenario, but the cost trend is notably unfavorable at end of study horizon.
- SNS bids with proxy resources selected under an LN price-policy scenario (the SNS Bid-LN portfolio) results in lower costs than the LN Bid portfolio when analyzed under the base price-policy scenario (MM).



Introduction

- PacifiCorp issued the 2020AS RFP to the market on July 7, 2020; bidder responses were returned to PacifiCorp for evaluation on August 10, 2020
 - The market responded with over 28,000 MW of conforming bids
 - An additional 12,500 MW of bids were submitted that did not conform with minimum requirements set forth in the 2020 AS RFP
- In October 2020, the initial shortlist was identified, which included 5,453 MW of renewable resource capacity—2,974 MW of solar or solar with storage (1,130 MW of battery storage), 2,479 MW of wind, and 200 MW of standalone battery capacity
- The transition interconnection cluster study process was subsequently initiated, and in April 2021, PacifiCorp began to evaluate best-and-final pricing updates from bidders
- Consistent with the bid evaluation and selection methodology set forth in the 2020AS RFP, PacifiCorp has evaluated a range of potential bid portfolios, reflecting results from the transitional interconnection cluster study process, to select the final shortlist, which includes:
 - 1,792 MW of new wind resources (590 MW as build-transfer agreements and 1,202 MW as power-purchase agreements)
 - 1,306 MW of solar capacity (all power-purchase agreements)
 - After modeling was well underway, Steel Solar I & II withdrew its combined 147 MW Utah solar and storage bids. These bids remained in the modeling effort and were removed from the Final Shortlist total after modeling was complete and not replaced.
 - 697 MW of battery energy storage system capacity—497 MW paired with solar bids (after Steel Solar I & II were removed) and 200 MW as standalone battery storage (power-purchase agreement)
- When using base case market price and CO₂ price assumptions, present-value net benefits of the final shortlist portfolio are \$571 million over the best performing portfolio without bids

Resource Need

Calendar Year	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
System										
Total Resources	10,671	10,646	10,685	10,391	10,334	9,997	9,943	9,043	8,538	8,313
Obligation	9,899	9,985	10,064	10,103	10,162	10,012	10,011	10,044	10,069	10,112
Reserves	1,310	1,321	1,331	1,336	1,344	1,325	1,324	1,329	1,332	1,338
Obligation + Reserves	11,209	11,306	11,395	11,439	11,506	11,336	11,335	11,372	11,401	11,449
System Position	(538)	(660)	(711)	(1,048)	(1,172)	(1,339)	(1,392)	(2,329)	(2,863)	(3,136)

- Final shortlist bids will help PacifiCorp fill a resource need.
- After accounting for a higher load forecast and recently signed contracts, the company's unmet capacity position is 1,172 MW in 2025—the first summer in which all resources from the 2020AS RFP will be online.
- The final shortlist has an estimated capacity contribution value of 998 MW.
- While the company's 2019 IRP assumed that over 1,400 MW of market purchases could be used to meet its requirements, the capacity position of the western interconnect is much tighter than in past years, with resource adequacy an ongoing concern in California and a growing concern elsewhere.
- The 2021 IRP assumes 500 MW market purchases available in summer and 1,000 MW in winter.



Summary of Bids Evaluated

- 27 projects from 16 bidders can achieve a commercial operation date before the end of 2024 based on signed interconnection agreement or study results and were considered for selection to the final shortlist.

Project Count	East					East Total	West			West Total	Grand Total
Type	East WY	SW WY	Goshen ID	UT North	UT South		Central OR	South OR	Yakima WA		
BESS				1		1					1
Solar				1	1	2	1	1	2	4	6
Solar + BESS				2	6	8		2	1	3	11
Wind	7	1	1			9					9
Grand Total	7	1	1	4	7	20	1	3	3	7	27

Capacity (MW)	East					East Total	West			West Total	Grand Total
Type	East WY	SW WY	Goshen ID	UT North	UT South		Central OR	South OR	Yakima WA		
BESS				200		200					200
Solar				42	95	137	103	40	340	483	620
Solar + BESS				192	956	1,148		210	94	304	1,452
Wind	1,744	122	151			2,017					2,017
Grand Total	1,744	122	151	434	1,051	3,501	103	250	434	787	4,288

REDACTED

2020AS RFP Final Shortlist



Project Name	Bidder	Type	Location	COD	Term/Life (Years)	Resource Capacity (MW)	Battery Capacity (MW)	Battery Duration (Hours)	Net Capacity Factor (%)	Bid PPA Price (\$/MWh)	Bid PPA Price (Fixed / Esc)	Battery Price Applied to Battery Capacity (\$/kW-mo)
Anticline	NextEra	Wind	WY	12/31/2024	30	100.5	n/a	n/a				
Cedar Springs IV	NextEra	Wind	WY	12/31/2024	30	350.4	n/a	n/a				
Rock Creek I*	Invenergy	Wind	WY	12/31/2024	30	190	n/a	n/a				
Rock Creek II*	Invenergy	Wind	WY	12/31/2024	30	400	n/a	n/a				
Boswell Springs	Innergex	Wind	WY	10/1/2024	30	320	n/a	n/a				
Two Rivers	Blue Earth Renewables LLC & Clearway Renew LLC	Wind	WY	12/31/2024	25	280	n/a	n/a				
Cedar Creek	rPlus Energies	Wind	ID	12/31/2022	25	151	n/a	n/a				
Steel Solar I & II	DESRI	PVS	UT	12/31/2023	25	147	37.5	2				
Rocket Solar II	DESRI	PVS	UT	12/31/2023	25	45	12.5	4				
Fremont	Longroad Energy	PVS	UT	11/30/2023	20	99	49.5	4				
Rush Lake	Longroad Energy	PVS	UT	11/30/2023	20	99	49.5	4				
Parowan	First Solar	PVS	UT	12/31/2024	25	58	58	4				
Hornshadow I	enyo energy	PVS	UT	12/31/2023	30	100	25	2				
Hornshadow II	enyo energy	PVS	UT	12/31/2023	30	200	50	2				
Green River I & II	rPlus Energies	PVS	UT	12/31/2024	20	400	200	2				
Hamaker	ecoplexus	PVS	OR	12/31/2023	30	50	12.5	4				
Hayden 2	ecoplexus	PVS	OR	12/31/2023	30	160	40	4				
Dominguez I	Able Grid	BESS	UT	7/1/2024	15	n/a	200	4				
Glen Canyon	sPower	Solar	UT	12/31/2023	30	95	n/a	n/a				

*BTA bids (additional price information in the next slide). All other bids are PPAs.

- Total wind and solar capacity = 3,098 MW
 - Wind = 1,792 MW
 - Solar = 1,306 MW (Note: this is without Steel Solar, which is in the revised analysis but has since been withdrawn by the developer.)
- Total battery energy storage system capacity (BESS) = 697 MW
 - Paired with photovoltaic (PVS) = 497 MW (excluding Steel Solar I & II, which withdrew from the RFP after being notified it was selected to the final shortlist)
 - Standalone BESS = 200 MW



Final Shortlist BTA Pricing

Nominal \$

Project Name	Bidder	Wind Bid with Direct-Assigned Interconnection Capital Cost	Wind Owner's Capital Cost & AFUDC	In-Service Interconnection Network Upgrade Capital Cost	Total In-Service Capital Cost
Rock Creek I	Invenergy	[REDACTED]			
Rock Creek II	Invenergy				

- In-service capital costs total \$ [REDACTED] m (\$ [REDACTED] m for bid capital, \$ [REDACTED] m for capitalized owner's costs, AFUDC, and property tax during construction, and [REDACTED] m for capital associated with interconnection network upgrades).

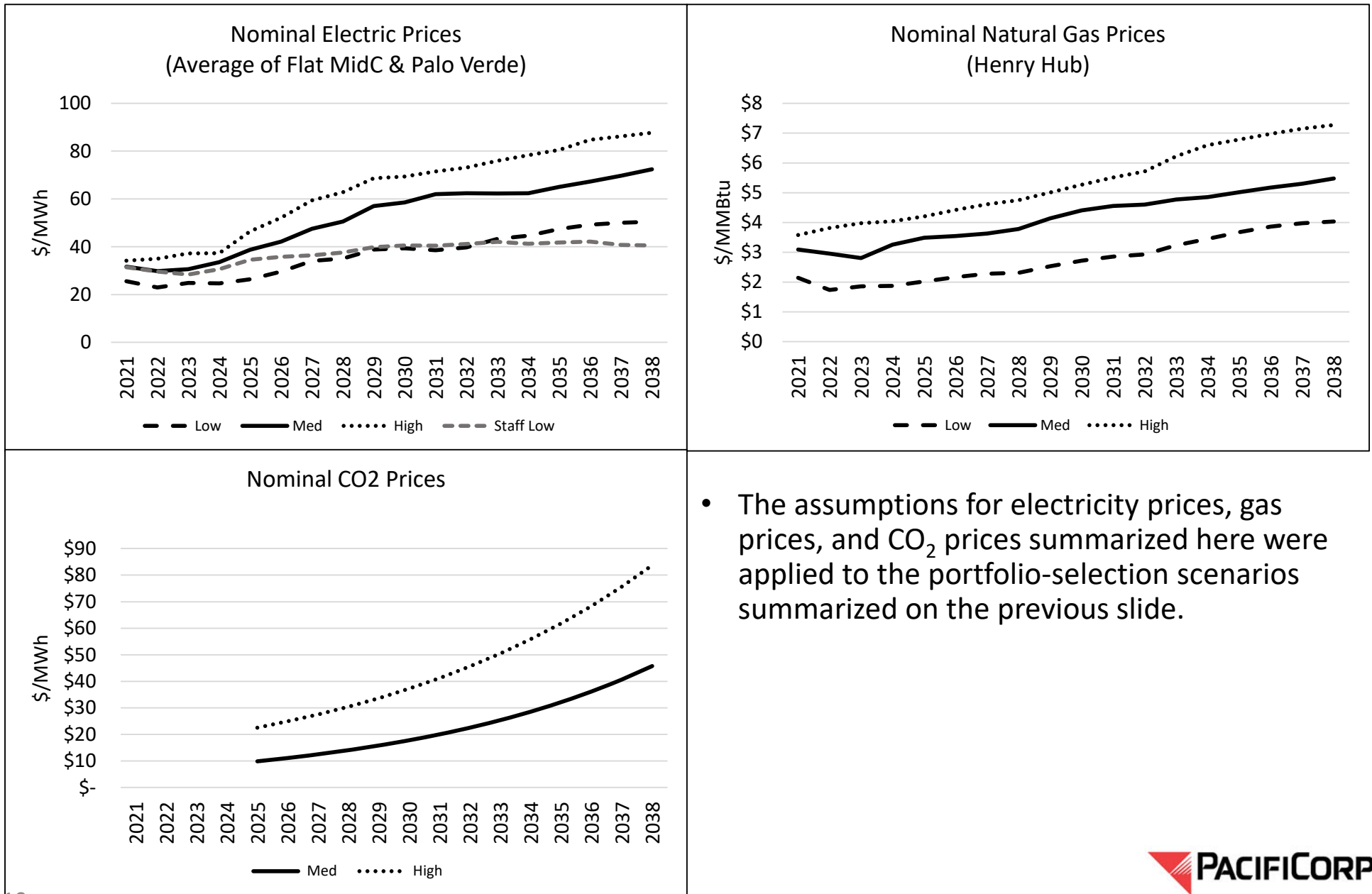
Portfolio-Selection Scenarios



- Portfolios were selected under a range of price-policy scenarios, plus others recommended by staff of the Public Utility Commission of Oregon:
 - LN: low gas/market price, no carbon price
 - MM: medium gas/market price, medium carbon price
 - HH: high gas/market price, high carbon price
 - SL: Staff's low market price sensitivity that assumes high renewable penetration in the WECC, medium gas price, and medium carbon price
 - SNS (MM): medium gas/market price, medium carbon price, but no wholesale market sales allowed
 - SNST (MM): the same as SNS (MM), plus PTC/ITC assumed extended through 2030
 - SNS Bid (LN): bid selections from the SNS (MM) case with proxy resources selected under LN price-policy assumptions (note, this case was not in the initial FSL evaluation, but added in this update to further analyze drivers to system cost differences between the SNS and LN bid portfolios)
- Portfolios with no RFP bids were also prepared—these scenarios are compared to the final shortlist bid portfolio to calculate net customer benefits.



Price-Policy Assumptions



- The assumptions for electricity prices, gas prices, and CO₂ prices summarized here were applied to the portfolio-selection scenarios summarized on the previous slide.



Bid Selections by Scenario

Location	Company	Project / Facility Name	Resource type	Contract Type	Generating Asset (MW)	BESS Capacity (MW)	BESS Duration (Hours)	LN	MM	HH	SL	FSL SNS (MM)	SNST (MM)	Type
East WY	NextEra	Cedar Springs IV	Wind	PPA	350.4	0	0	0	350.4	350.4	350.4	350.4	350.4	Wind
East WY	Innergex Renewable	Boswell Springs	Wind	PPA	320	0	0	0	320	320	320	320	320	
East WY	BluEarth/Clearway Renew	Two Rivers Wind Project	Wind	PPA	280	0	0	0	280	280	280	280	280	
East WY	NextEra	Anticline	Wind	PPA	100.5	0	0	0	100.5	100.5	100.5	100.5	100.5	
East WY	Invenergy	Rock Creek I BTA	Wind	BTA	190	0	0	0	190	190	190	190	190	
East WY	Invenergy	Rock Creek II 400	Wind	BTA	400	0	0	0	400	400	400	400	400	
Goshen ID	rPlus	Cedar Creek	Wind	PPA	151	0	0	0	151	151	151	151	151	Solar and/or Battery
UT South	Enyo Renewable Energy	Hornshadow II	Solar + BESS	PPA	200	50	2	200	200	200	200	200	200	
UT North	Able Grid Energy Solutions	Dominguez I	BESS	BSA	0	200	4	200	200	200	200	200	200	
UT South	rPlus	Green River Solar I & II	Solar + BESS	PPA	400	200	2	400	400	400	400	400	400	
UT North	DESRI	Steel I 80 + Steel II	Solar + BESS	PPA	147	37.5	2	0	147	147	147	147	147	
UT South	Long Road Energy	Rush Lake	Solar + BESS	PPA	99	49.5	4	99	99	99	99	99	99	
UT South	Long Road Energy	Fremont	Solar + BESS	PPA	99	49.5	4	99	99	99	99	99	99	
UT North	DESRI	Rocket II	Solar + BESS	PPA	45	12.5	4	0	45	45	45	45	45	
UT South	Enyo Renewable Energy	Hornshadow I	Solar + BESS	PPA	100	25	2	100	100	100	100	100	100	
UT South	AES Clean Power (sPower)	Glen Canyon A	Solar	PPA	95	0	0	0	95	95	95	95	95	
UT South	First Solar (now Leeward)	Parowan	Solar + BESS	PPA	58	58	4	58	58	58	58	58	58	
South OR	ecoplexus	Hayden Mountain 2	Solar + BESS	PPA	160	40	4	0	160	160	0	160	160	
South OR	ecoplexus	Hamaker	Solar + BESS	PPA	50	12.5	4	0	50	50	0	50	50	
Total Maximum Capacity (MW)								1,156	3,722	4,247	3,235	3,445	3,445	
Total Capacity Contribution (MW)								575	1,081	1,148	924	998	998	

- * **Change** from June 8, 2021 RFP Presentation – selection made by model, not due to withdrawn bid
- * FSL = final shortlist
- * Note, the Energy Gateway South transmission line was selected in all but the LN portfolio



Demand Response Selections

- Each 2020AS RFP bid portfolio includes bids submitted into the 2021DR RFP as a resource alternative (as selected by the System Optimizer model).
- Demand response selections are incremental to existing programs.
- Demand response selections vary by portfolio-selection scenario.
- Selected programs begin in 2022 and grow over the first ten years.
- The ability to ramp quickly into the full capacity identified starting in 2022 in any scenario below may be limited by program selection, design, and delivery requirements.
- Commitments to specific programs will be made as part of ongoing or new procurement processes, and in some instances regulatory approvals.

DR Bid Selections (MW)	2022				2030			
	MM	SNS	LN	SNS Bid-LN	MM	SNS	LN	SNS Bid-LN
Rocky Mountain Power	59	75	75	43	229	245	245	198
Pacific Power	12	46	46	45	91	316	316	260
Total	71	121	121	88	320	561	561	458

Portfolio Costs – MM Scenario

Revised Analysis

PaR Stochastic Mean PVRR and Change From LN Bids Portfolio (\$ millions)

Price-Policy	Portfolio							SNS
	LN Bids	MM Bids	HH Bids	No Bid LN	No Bid MM	No Bid HH	SNS Bids	Bids-LN
MM	23,828	23,968	24,408	24,306	24,345	24,959	23,893	23,735
Delta	0	139	580	477	517	1,131	65	(94)

- Of the scenarios considered previously, the LN Bid portfolio has the lowest cost under MM price-policy conditions.
- However, taking the SNS bids and selecting future proxy resources under LN conditions has an even lower cost—additional details are provided on the following slides.
- Portfolios with bids provide several hundred million dollars in benefits relative to portfolios without bids.

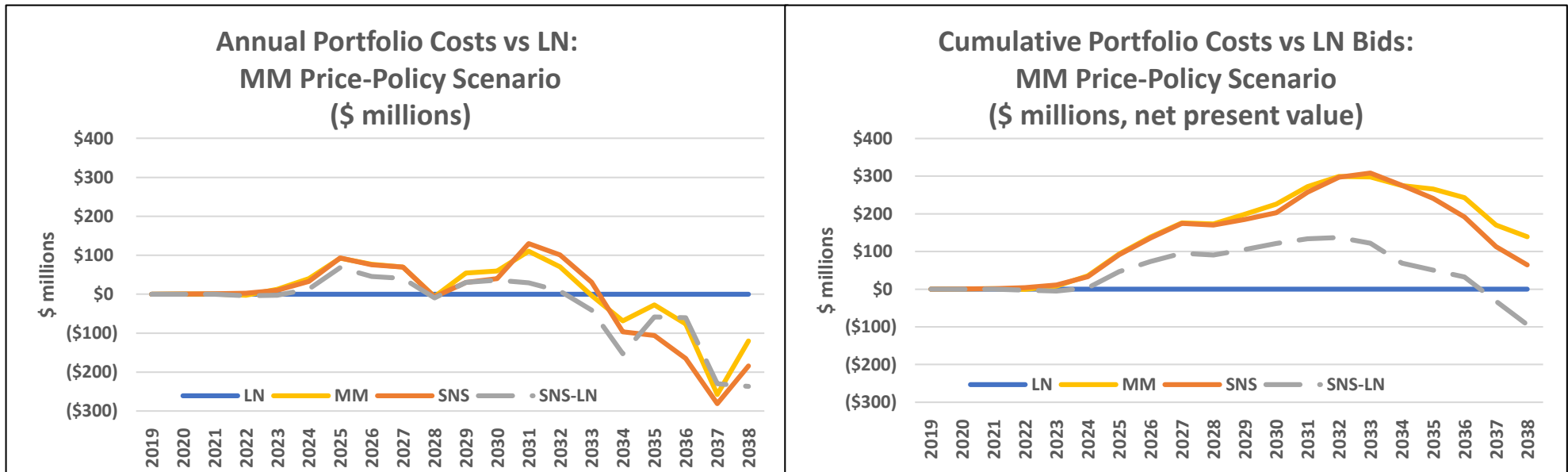
June 8, 2021 Analysis

PaR Stochastic Mean PVRR (\$ millions)							
Price-Policy	Portfolio						
	LN Bids	MM Bids	HH Bids	No Bid LN	No Bid MM	No Bid HH	SNS Bids
MM	23,903	23,898	24,594	24,306	24,345	24,959	24,022
Change from MM Portfolio	5	0	696	408	447	1,061	124



Annual Portfolio Costs

- The LN bid portfolio has the lowest annual costs through 2032 in the MM price-policy scenario, but costs climb quickly thereafter.
- Reported present value results are for 2019-2038, consistent with the 2019 IRP study horizon.
- The LN bid portfolio costs in 2039 and beyond are expected to continue to be higher than other portfolios, suggesting the results would worsen over a longer study horizon.

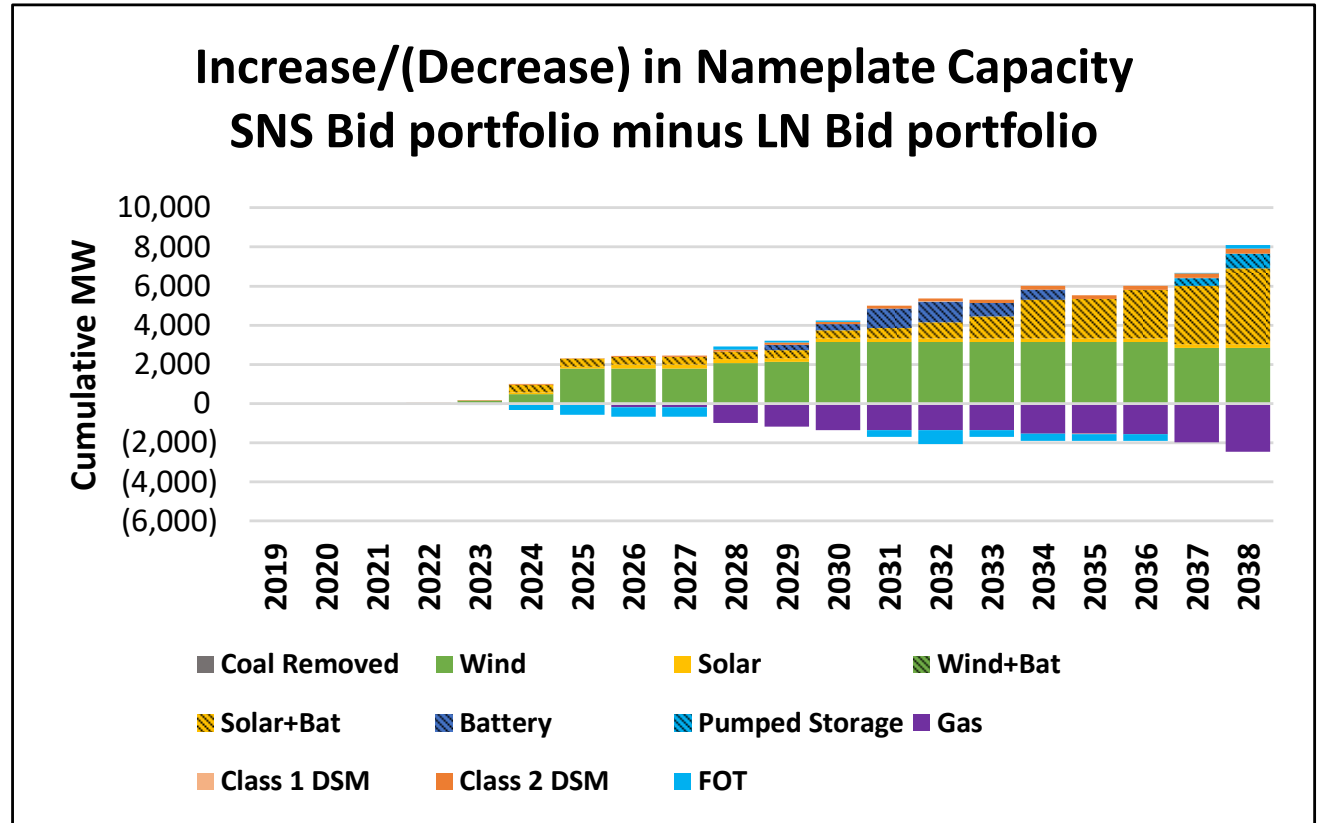




Portfolio Compare

SNS Bid vs LN Bid

- The SNS bid portfolio has less gas and a lower open position (depicted with FOTs) relative to the LN bid portfolio.
- In addition, to these changes, the SNS bid portfolio adds more wind in 2030, battery capacity in 2031, and solar and storage thereafter.
- Annual cost results indicate some of the LN bid portfolio selections for proxy units in the intermediate timeframe are more cost-effective than proxy resource selections in the SNS bid portfolio.





SNS Bid-LN Portfolio

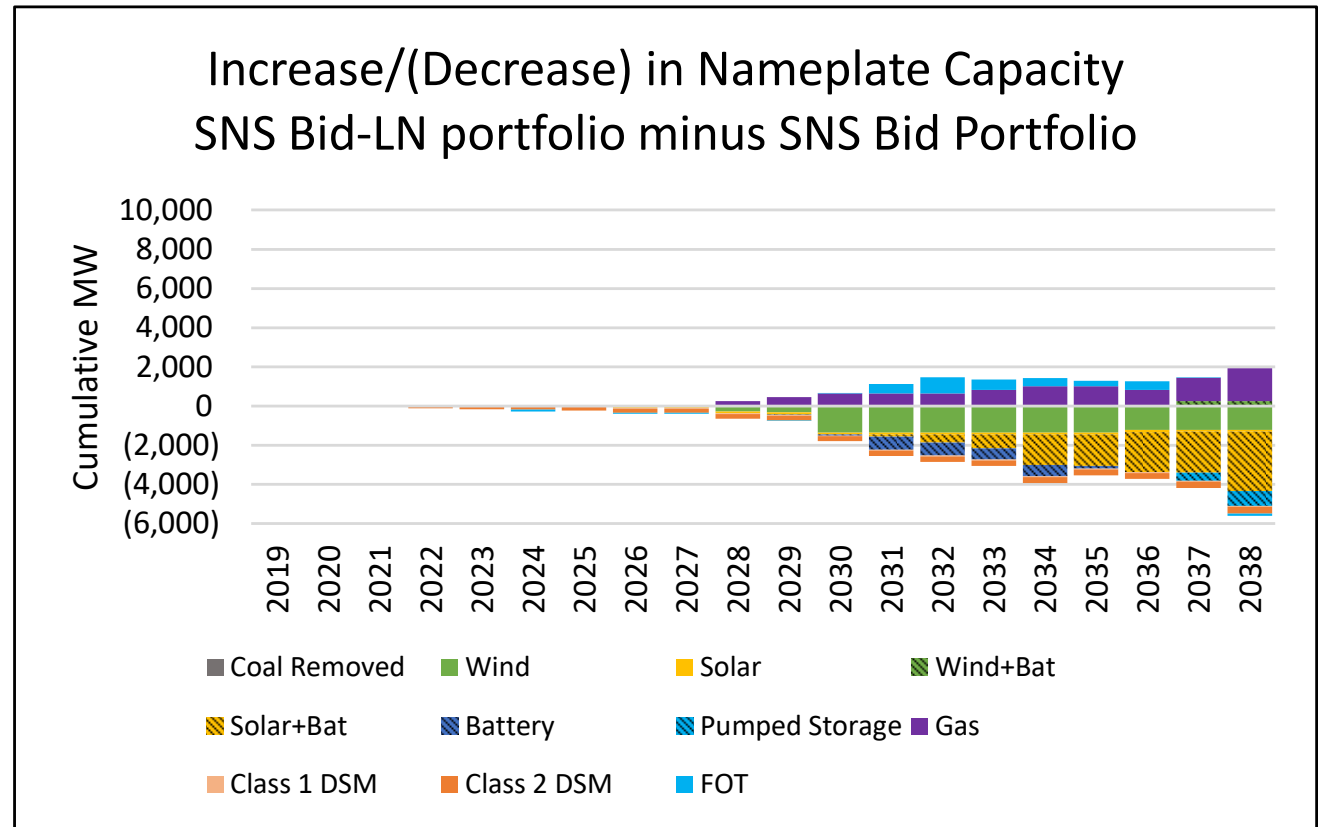
- Considering these portfolio cost trends, the company looked for a way to combine the best aspects of the SNS and LN portfolio selections to better isolate value drivers associated with bids from value drivers associated with future proxy resources.
- The SNS portfolio was developed using the MM price curve, but with no market sales allowed.
- An alternate portfolio (SNS Bid-LN) was developed with:
 - The bids selected in the SNS portfolio
 - SO model selections of additional proxy resources for the remainder of the study period under LN price-policy conditions.
 - As in the LN bid portfolio, market sales were allowed.
- This portfolio's performance was evaluated under the same price-policy conditions as the other portfolios.

Portfolio Compare

SNS Bid-LN vs SNS Bid

Relative to the SNS Bid portfolio, the SNS Bid-LN portfolio has:

- Wind: 1,297 MW lower in 2028-2030
- Solar w/ storage: 3,000 MW lower in 2031-2038
- Stand-alone battery: 675 MW delayed 3-5 years
- Gas peakers: 589 MW higher in 2028-2030, plus 379 MW in 2033-2034, and more thereafter.



Portfolio Costs – LN Scenario

Revised Analysis

PaR Stochastic Mean PVRR and Change From LN Bids Portfolio (\$ millions)

Price-Policy	Portfolio							
	LN Bids	MM Bids	HH Bids	No Bid LN	No Bid MM	No Bid HH	SNS Bids	SNS Bids-LN
LN	18,578	20,106	21,124	18,744	20,064	21,099	20,096	19,299
Delta	-	1,528	2,546	166	1,486	2,521	1,518	721

- Under LN price-policy conditions, the LN Bid portfolio, SNS Bid portfolio, SNS Bids-LN portfolio, and the LN and MM portfolios without bids, outperform the MM portfolio.
- The MM Bid and SNS Bid portfolios produce similar results.
- The SNS Bid-LN portfolio results are midway between the LN Bid and MM Bid portfolio results.

June 8, 2021 Analysis

PaR Stochastic Mean PVRR (\$ millions)							
Price-Policy	Portfolio						
	LN Bids	MM Bids	HH Bids	No Bid LN	No Bid MM	No Bid HH	SNS Bids
LN	18,713	20,179	21,287	18,744	20,064	21,099	20,192
Change from MM Portfolio	(1,465)	-	1,109	(1,435)	(114)	920	14



Portfolio Costs – HH Scenario

Revised Analysis

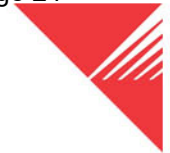
PaR Stochastic Mean PVRR and Change From MM Bids Portfolio (\$ millions)

Price-Policy	Portfolio							
	LN Bids	MM Bids	HH Bids	No Bid LN	No Bid MM	No Bid HH	SNS Bids	SNS Bids-LN
HH	28,653	27,351	27,455	29,419	28,307	28,559	27,367	27,799
Delta	1,302	-	104	2,068	956	1,208	16	448

- The MM Bid portfolio is top-performing in the HH price-policy scenario, followed closely by the SNS Bid portfolio
- The SNS Bid-LN portfolio results are slightly closer to the MM Bid portfolio than the LN Bid portfolio.
- Note, the difference between the SNS Bid portfolio and the SNS Bid-LN portfolio is entirely driven by differences in proxy resources (and not bids).

June 8, 2021 Analysis

PaR Stochastic Mean PVRR (\$ millions)								
Price-Policy	Portfolio							
	LN Bids	MM Bids	HH Bids	No Bid LN	No Bid MM	No Bid HH	SNS Bids	
HH	28,675	27,315	27,673	29,419	28,307	28,559	27,493	
Change from MM Portfolio	1,361	-	358	2,104	992	1,244	178	



Marginal Bids

- Appendix A includes an indicative assessment of the net benefit or cost for each bid.
- This information helped identify which bids in the SNS portfolio might be marginal in terms of customer benefit.
- PacifiCorp further evaluated these bids to ensure their potential inclusion in the final shortlist would provide value for customers. Based on the nature of the revised inputs, the revised analysis focused on the lowest value eastern Wyoming bids: Rock Creek 1 and Rock Creek 2.
- Removing Rock Creek 1 or 2 results in higher costs, so these bids remain in the final shortlist.

Revised Analysis

PaR Stochastic Mean PVRR vs SNS Bids-LN Portfolio

(\$ millions) Portfolio

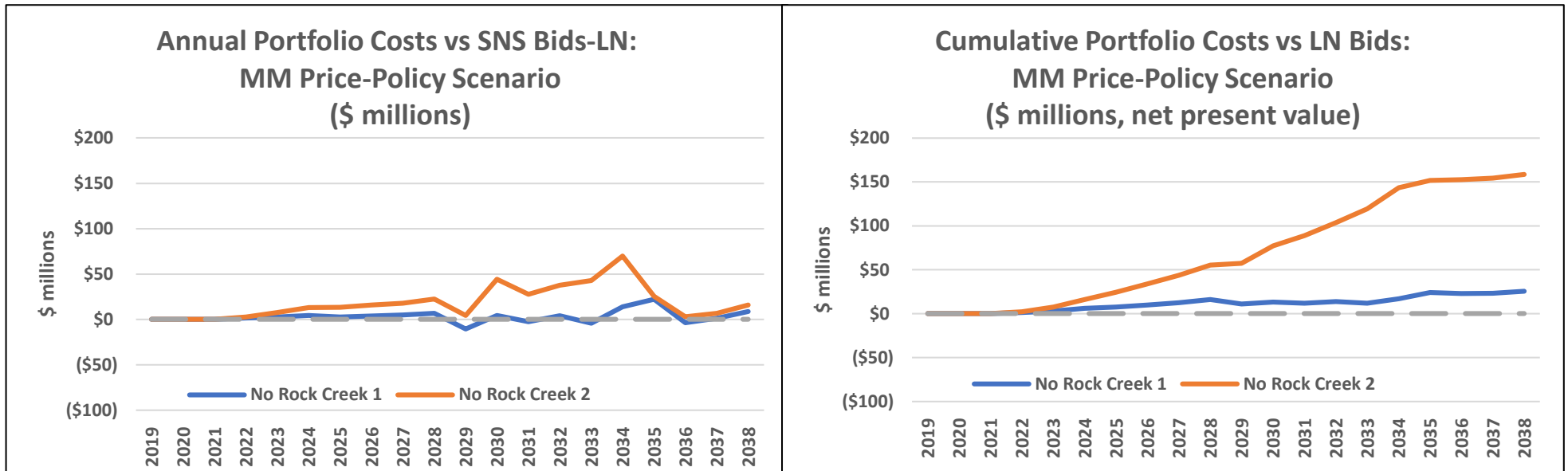
	SNS Bids-LN	Remove Rock Creek 1	Remove Rock Creek 2
Price-Policy			
MM	23,735	23,760	23,893
Delta	0	26	159

June 8, 2021 Analysis

PaR Stochastic Mean PVRR (\$ millions)					
Portfolio					
Price-Policy	SNS	Remove Glen Canyon	Remove Hamaker	Remove Rock Creek 1	Remove Rock Creek 2
SNS	25,857	25,943	25,896	25,986	26,067
Change from SNS Portfolio	0	86	38	129	210

Marginal Bids – Annual Costs

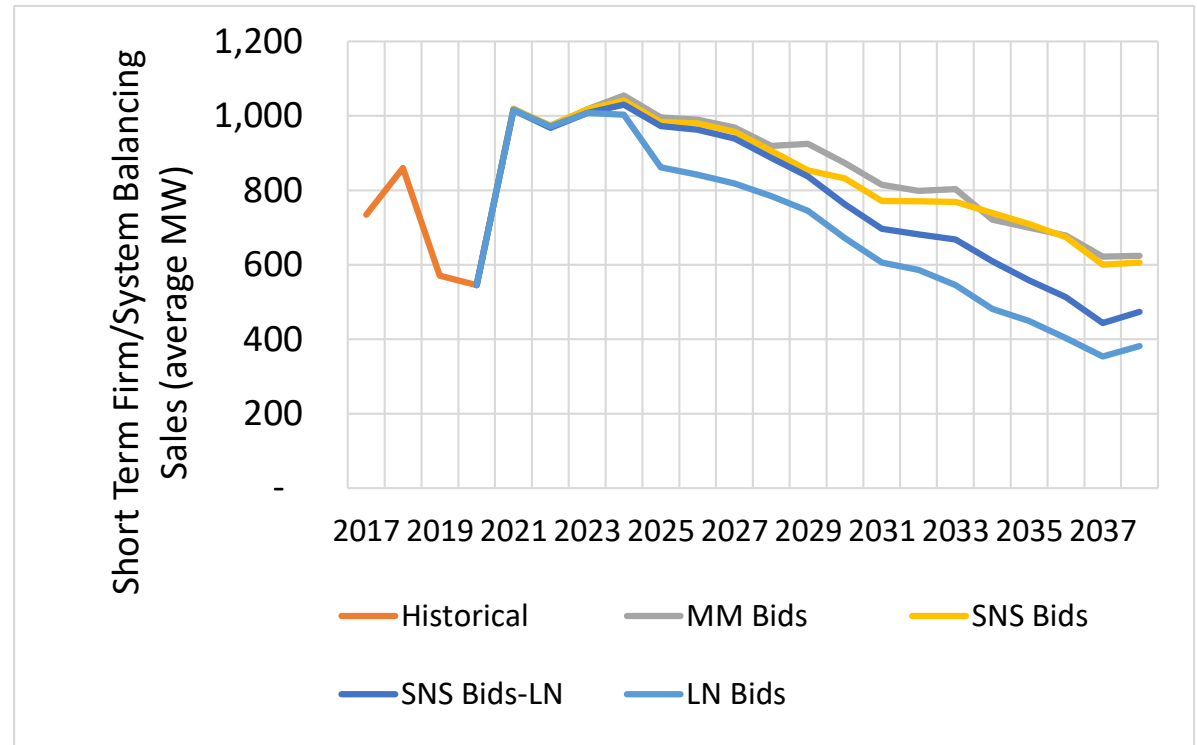
- Each additional resource in a congested location produces lower benefits.
- The sensitivities evaluate the last-in benefits of each Rock Creek resource in eastern Wyoming.
- Because of its larger size (400 MW vs 190 MW for Rock Creek 1) Rock Creek 2 provides proportionately higher benefits, despite having a slightly lower indicative net benefit.
- Rock Creek 1, the smaller of the two Rock Creek bids, provides benefits in most years of the study period.
- Note a positive value indicates a net benefit, a negative value indicates a net cost.





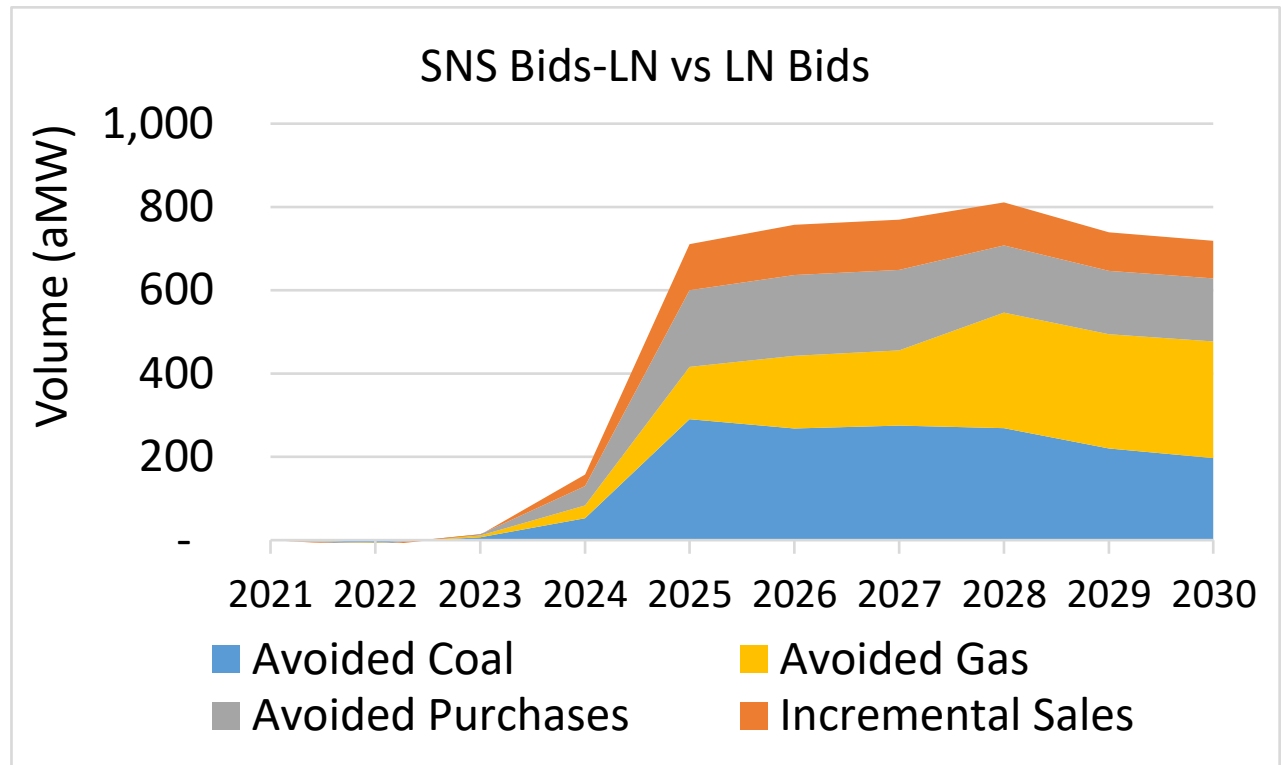
Market Sales by Portfolio

- While there is a slight uptick in forecasted market sales in 2024, market sales are forecasted to decline in the MM price-policy results for the LN, MM, SNS, and SNS Bids-LN resource portfolios.
- Market prices and volumes were low in 2019 due to weather and in 2020 due to COVID-19.
- Modeled markets can be more liquid (more purchases and sales) than current market structures, which primarily trade multiple hour blocks (e.g., the heavy load hour product from 6 a.m. to 10 p.m.)
- EIM has made intra-hour trading more liquid and an extended day-ahead market may further increase the liquidity of short-term firm transactions.



Incremental Bid Volumes (1)

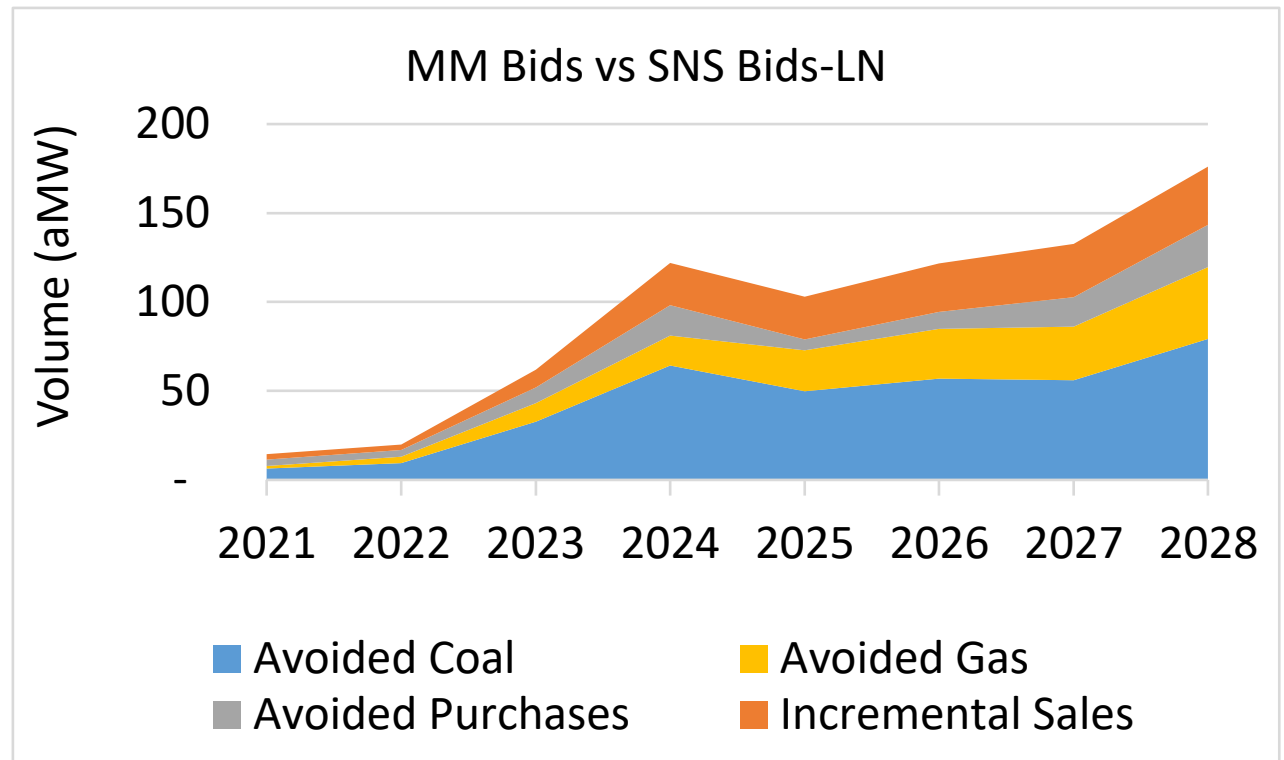
- All bids have scheduled CODs by the end of 2024 based on signed interconnection agreement or study results.
- Relative to the LN Bid portfolio, the SNS Bid-LN portfolio includes Gateway South and eastern Wyoming wind, plus solar in OR and UT.
- Under MM price-policy assumptions, the additional bids in the SNS Bids-LN portfolio mainly avoid coal, gas, and market purchases.
- Incremental sales in the SNS Bids-LN portfolio amount to roughly 16% of the total change in system energy in 2025-2027 and decline thereafter.





Incremental Bid Volumes (2)

- Relative to the SNS Bid-LN portfolio, the MM Bid portfolio includes off-system wind in eastern Wyoming, plus solar in Washington.
- Under MM price-policy assumptions, the additional bids in the MM Bid portfolio lean more heavily on incremental market sales, which represent 23% of the total change in system energy in 2025-2027.
- As a result, the value of these bids is more dependent on market prices.
- These bids are expensive relative to other resource options—future alternatives may provide greater value.



Additional MM Considerations

- Emissions and Reliability

Revised	CO2 (ktons)	ENS (GWh)
MM Bids	557,013	361
LN Bids	647,710	242
SNS Bids	562,984	183
SNS Bids-LN	599,584	183

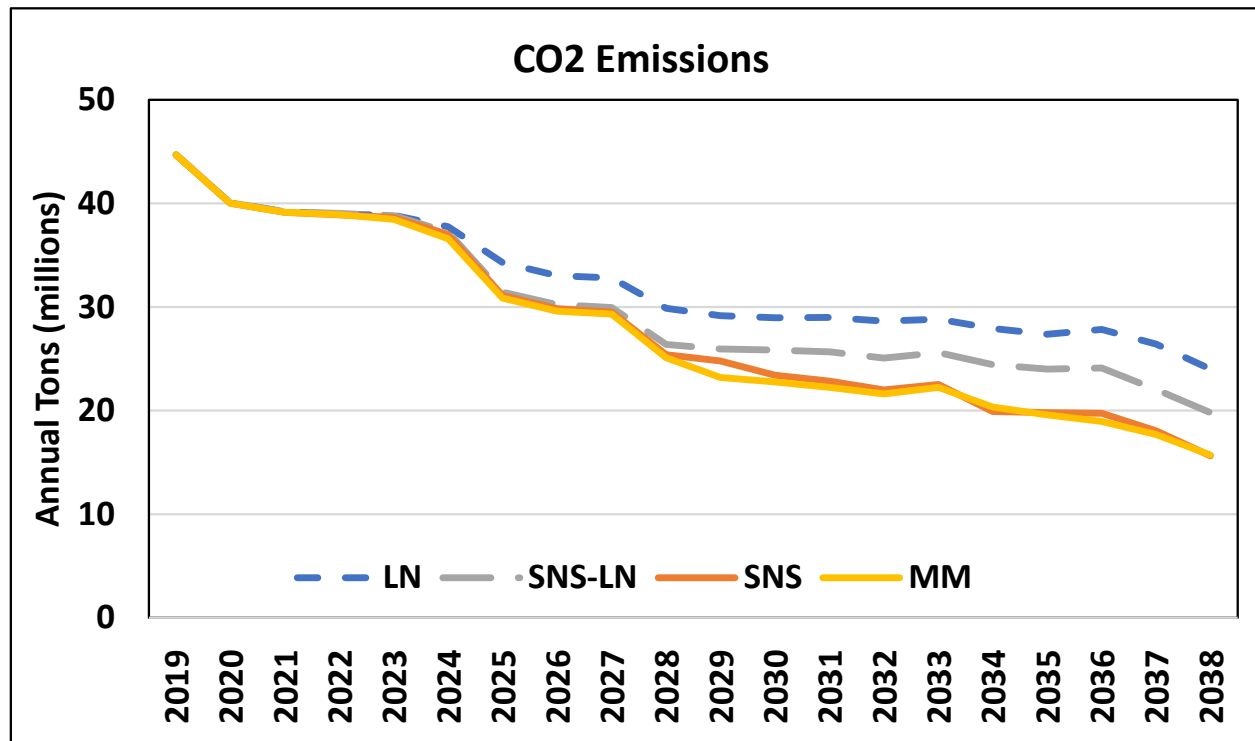
6/8/2021	CO2 (ktons)	ENS (GWh)
MM Bids	561,244	170
LN Bids	644,970	274
SNS Bids	565,943	349

- CO₂ emissions in the MM Bid and SNS Bid portfolios are comparable, while the LN Bid portfolio emissions are 16% higher. The SNS Bid-LN portfolio is midway between MM and LN.
 - Most ENS is in the last ten years in all studies.
 - The company will be further refining its reliability calculations in its 2021 IRP and will be able to identify the best resource additions to address any shortfalls.
- Gateway South is included in the MM, SNS, and the SNS Bids-LN portfolios, but not in the LN portfolio:
 - Gateway South strengthens transmission at Mona/Clover allowing additional renewable generation in southern Utah with new transmission development.
 - Gateway South acts as a relief valve during low load and outage conditions increasing the reliability of the transmission system especially with the addition of renewable resources in southern Utah.
 - Modeled results do not fully capture these effects.



CO₂ Emissions

- CO₂ emissions are highest for the LN Bid portfolio due to higher dispatch of existing coal and gas, and more natural gas proxy resource additions.
 - 16% higher than MM Bids
 - 8% higher than SNS Bid-LN
- SNS Bid-LN portfolio emissions are comparable to MM and SNS until 2028 – the resource decisions that drive this difference will not be made for several more years.



Portfolio Costs – Sensitivities

Revised Analysis

PaR Stochastic Mean PVRR (\$ millions)

Price-Policy	Portfolio		Change from MM Portfolio
	MM Bids	Sensitivity	
SL	24,003	23,981	(22)
SNS	25,987	25,834	(153)
SNST	25,665	25,183	(482)

June 8, 2021 Analysis

Price-Policy	Portfolio		Change from MM Portfolio
	MM Bids	Sensitivity	
SL	24,143	24,058	(85)
SNS	25,922	25,857	(65)
SNST	25,812	25,283	(529)

- “Sensitivity” portfolios were developed and evaluated for each of Staff’s price-policy assumptions.
- The MM Bid portfolio was also evaluated under each of these assumptions for comparison.
- Each Sensitivity outperforms the MM Bid portfolio under its respective price-policy assumptions, though the impact in the SL and SNS scenarios is relatively small.
- The SNST portfolio has the same wind selections as the SNS portfolio identified in the final shortlist, so benefits are from future wind selections that supplement rather than replace the RFP bids.



FOT Sensitivity

- Additional sensitivities were prepared using the FOT limits from the 2021 IRP.
 - 500 MW in summer and 1,000 MW winter, starting 2022
- Reducing FOT limits results in substantially higher costs in the LN Bids case, but only a modest cost increase in the MM Bids and SNS Bids cases.

PaR Stochastic Mean PVRR and Impact of Reduced FOT Limit (\$ millions)				
	RFP Bids	2019 IRP FOT	2021 IRP FOT	
Price Policy	(MW)	Limits	Limits	Delta
LN Bids	1,156	23,828	25,078	1,249
MM Bids	3,722	23,968	24,076	109
SNS Bids	3,445	23,893	24,079	186

MM Bids vs. SNS Bids

- There are three fewer bids selected in the SNS Bid-LN portfolio, relative to bids selected in the MM Bid portfolio
 - [REDACTED] (off-system in Eastern Wyoming)
 - This resource is the most expensive remaining bid in eastern Wyoming
 - Because it is located within the Tri-State Generation and Transmission (TSGT) BAA, it requires transmission service to the PacifiCorp system
 - While the developer covers transmission service costs, it is unclear how it will be treated for intra-hour dispatch, or future day-ahead market or resource adequacy showings
 - Parts of TSGT are in the intra-hour market run by SPP, and not the Western EIM run by CAISO in which PacifiCorp participates (www.spp.org/weis/)
 - [REDACTED] and [REDACTED] (Yakima)
 - Relative to other solar with storage and solar bids, these projects are higher cost
- For these reasons and considering the increased reliance on market sales for the MM Bid portfolio relative to the SNS Bid-LN portfolio (described earlier), PacifiCorp is not considering these three bids for selection to its final shortlist.



Value of Final Shortlist Bids

Revised Analysis

June 8, 2021 Analysis

PaR Stochastic Mean PVRR (\$ millions)

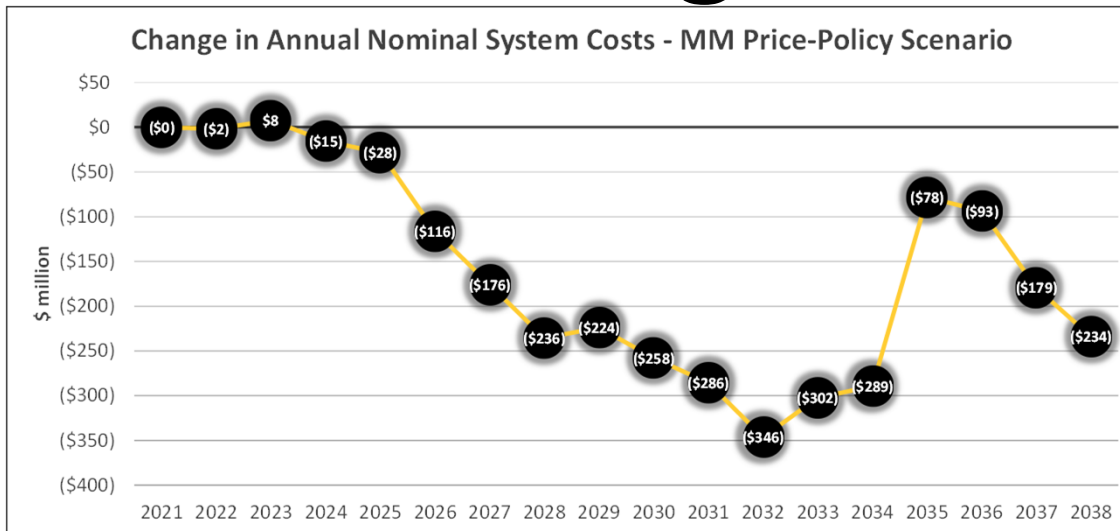
Price-Policy	Portfolio		Change with no bids
	SNS Bids	Best No Bid	
LN	20,096	18,744	(1,352)
MM	23,893	24,306	413
HH	27,367	28,559	1,192

Price-Policy	Portfolio		Change with no bids
	SNS Bids-LN	Best No Bid	
LN	19,299	18,744	(555)
MM	23,735	24,306	571
HH	27,799	28,559	760

Price-Policy	Portfolio		Change from SNS Portfolio
	SNS Bids	No Bid	
LN	20,192	18,744	(1,449)
MM	24,022	24,345	323
HH	27,493	28,559	1,066

- Under MM and HH price-policy conditions, the SNS Bid portfolio outperforms the best no bid portfolio.
- The SNS Bid-LN portfolio has even lower costs under LN and MM conditions.
- After adding the SNS bids to the company's portfolio, many opportunities will remain to reoptimize future resource decisions.

Nominal Change in Annual Cost



Best portfolio w/ bids in MM:
SNS Bid-LN

minus

Best portfolio w/o bids in MM:
No Bid LN

- The figure above summarizes annual nominal revenue requirement impacts associated with the RFP final shortlist bids and all associated transmission costs relative to the no-bid scenario assuming MM price-policy assumptions—negative values represent a reduction in revenue requirement with final shortlist bids and associated transmission projects.
- In 2025, the first full year all shortlisted bids and transmission projects are in service, the system nominal revenue requirement decreases by \$28m.
- Year-to-year variability in annual nominal costs over time are largely influenced by changes in the timing of future resources between the two scenarios (with and without shortlisted bids).
 - Without shortlisted bids, gas resources are needed in 2026-2028 timeframe, battery resources are accelerated in 2031-2032, and wind and solar are added in 2036-2037, all of which reduce revenue requirement relative to the case with shortlisted bids (the SNS Bid-LN portfolio).
 - PTCs for the two build-transfer agreement wind bids expire beginning 2034, resulting in an uptick in system costs.
 - The increase in annual savings in the 2037 timeframe coincides with the retirement of Huntington, which is replaced by a combination of gas peakers and solar with storage in both studies, with a larger amount of solar with storage added in the portfolio without bids.



Appendix A

Indicative Assessment of the Net Benefit/Cost for Each Bid

Overview of Appendix A

- To determine which resources might be marginal, the company used the system benefit curve values developed for the ISL and the final bid costs to identify a net benefit (or cost) for each bid.
- This data is provided for informational purposes only to give a sense of how the potential value of bids with the same or similar technology in a region compare to one another.
- System benefit curve values were developed using the company's June 2020 market prices and resource additions from the 2019 IRP preferred portfolio.
- When preparing values for a location, resources in that location were cut by half so that the result represents an average value for that location, rather than a last-in or marginal value.
- As a result of market price changes, declining marginal benefits within each location, and interactions across the system, the actual value of generation is expected to vary from that identified here, but is expected to impact resources in the same location and of the same type in a comparable manner, making the results useful for assessing the relative value or cost of specific bids.
- Updated Net Delivery Costs and Indicative Generation Values reflect corrections in annual generation and net capacity factors related to embedded text and omission of hours with no generation in some bidders' 8760 profiles.

REDACTED

Wind Bids



- Seven (7) wind resource bids are in eastern Wyoming, including five PPAs and two BTAs
- One bid is in Goshen, Idaho and one is in southwest Wyoming
- The Indicative Generation Value is based on hourly locational prices from June 2020 used in price scoring for the initial shortlist, which is mainly useful for comparing resources of the same type and location
- Net Benefit/(Cost) reflects the final bids and network upgrade costs

Location	Company	Project / Facility Name	Contract Type	Generating Asset (MW)	BESS Capacity (MW)	BESS Duration (Hours)	FSL Proposed COD	Net Delivery Cost (\$/MWh)	Indicative Generation Value (\$/MWh)	Net Benefit / (Cost)			
East WY	NextEra	Cedar Springs IV	PPA	350.4	0	0	1/1/2025						
East WY	Innergex Renewable	Boswell Springs	PPA	320	0	0	10/1/2024						
East WY	BluEarth Renewables US/Clearway Renew	Two Rivers Wind	PPA	280	0	0	1/1/2025						
East WY	NextEra	Anticline	PPA	100.5	0	0	1/1/2025						
East WY	Invenergy	Rock Creek II 400	BTA	400	0	0	12/31/2024						
East WY	Invenergy	Rock Creek I BTA	BTA	190	0	0	12/31/2024						
Goshen ID	rPlus	Cedar Creek	PPA	151	0	0	12/31/2022						
SW WY	Invenergy	Uinta	BTA	121.8	0	0	12/31/2024						

REDACTED

Utah Bids

- All Utah bids are for solar and/or battery storage
- Bids for solar with storage have battery capacity ranging from 25% to 100% of solar capacity, and duration ranging from two to four hours
- The Indicative Generation Value is based on hourly locational prices from June 2020 used in price scoring for the initial shortlist, which is mainly useful for comparing resources of the same type and location
- Net Benefit/(Cost) reflects the final bids and network upgrade costs

Location	Company	Project / Facility Name	Contract Type	Generating Asset (MW)	BESS Capacity (MW)	BESS Duration (Hours)	FSL Proposed COD	Net Delivery Cost* (\$/MWh)	Indicative Generation Value (\$/MWh)	Net Benefit / (Cost)
UT South	Enyo Renewable Energy	Hornshadow II	PPA	200	50	2	12/31/2023			
UT North	Able Grid Energy Solutions, Inc.	Dominguez I	BSA	0	200	4	7/1/2024			
UT South	rPlus	Green River Solar I	PPA	400	200	2	1/1/2025			
UT South	Long Road Energy	Rush Lake	PPA	99	49.5	4	11/30/2023			
UT South	Long Road Energy	Fremont	PPA	99	49.5	4	11/30/2023			
UT South	Enyo Renewable Energy	Hornshadow I	PPA	100	25	2	12/31/2023			
UT North	DESRI	Steel I 80 + Steel II	PPA	147	37.5	2	12/31/2023			
UT South	First Solar (now Leeward Energy)	Parowan	PPA	58	58	4	12/31/2024			
UT South	AES Clean Power (sPower LLC)	Glen Canyon A	PPA	95	0	0	12/31/2023			
UT North	DESRI	Rocket II	PPA	45	12.5	4	12/31/2023			

* Net Delivery Cost is net of value of storage, if applicable



West Bids and Ranking

- All west-side bids are for solar or solar with battery storage
- Bids are in Central Oregon, Southern Oregon, and Yakima, Washington
- The Indicative Generation Value is based on hourly locational prices from June 2020 used in price scoring for the initial shortlist, which is mainly useful for comparing resources of the same type and location
- Net Benefit/(Cost) reflects the final bids and network upgrade costs

Location	Company	Project / Facility Name	Contract Type	Generating Asset (MW)	BESS Capacity (MW)	BESS Duration (Hours)	FSL Proposed COD	Net Delivery Cost* (\$/MWh)	Indicative Generation Value (\$/MWh)	Net Benefit / (Cost)
South OR	ecoplexus	Hayden Mountain 2	PPA	160	40	4	12/31/2023			
South OR	ecoplexus	Hamaker	PPA	50	12.5	4	12/31/2023			

* Net Delivery Cost is net of value of storage, if applicable

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities

EXHIBIT NEWSUN/603

PacifiCorp “Cluster Study #2” Interconnection Queue

as of 5/23/22 (accessed on 6/3/22).

PacifiCorp Generation Interconnection Requests As of: 5/23/22

Interconnect Request Information				Request Status	Company Name	Service Type	Application Rules	Qualifying Facility Status	Max MW Output		Location of Generating Facility			In-Service Date (Commercial Operations)		Type	Cluster Study	Facilities Study	Schedule Deviation	Request Status Explanation	
Generation Interconnection Cluster Number	Cluster	Cluster Area	Request Date						S	W	County	ST	Region	Point of Interconnection	Customer Requested Commercial Operations Date						Agreed to Commercial Operations Date
C2-01	Cluster 2	CA4	4/1/22	In Progress	PacifiCorp	NR/ER	LGI	No	199.9	199.9	Sweetwater	WY	PACE	Anticline substation	12/15/26	TBD	Battery Storage			0	
C2-02	Cluster 2	CA9	4/1/22	In Progress	PacifiCorp	NR/ER	LGI	No	199.9	199.9	Juab	UT	PACE	Clover substatin	12/15/26	TBD	Battery Storage			0	
C2-03	Cluster 2	CA2	4/1/22	In Progress	PacifiCorp	NR/ER	LGI	No	199.9	199.9	Carbon	WY	PACE	Aeolus substation	12/15/26	TBD	Battery Storage			0	
C2-04	Cluster 2	CA20	4/1/22	In Progress	PacifiCorp	NR/ER	LGI	No	199.9	199.9	Klamath	OR	PACW	Snow Goose substation	12/15/26	TBD	Battery Storage			0	
C2-05	Cluster 2	CA9	4/1/22	In Progress	PacifiCorp	NR/ER	LGI	No	199.9	199.9	Juab	UT	PACE	Mona substation	12/15/26	TBD	Battery Storage			0	
C2-06	Cluster 2	CA18	4/1/22	In Progress		NR	OLGI	Yes	80	80	Crook	OR	PACW	Ponderosa substation	5/30/26	TBD	Solar & Battery Storage			0	
C2-07	Cluster 2	CA18	4/1/22	In Progress		NR	OLGI	Yes	80	80	Crook	OR	PACW	Baldwin Road-Ponderosa transmission line	5/30/26	TBD	Solar & Battery Storage			0	
C2-08	Cluster 2	CA18	4/1/22	In Progress		NR	OLGI	Yes	80	80	Crook	OR	PACW	Ponderosa substation	5/30/26	TBD	Solar & Battery Storage			0	
C2-09	Cluster 2	CA18	4/1/22	In Progress		NR	OLGI	Yes	80	80	Crook	OR	PACW	Ponderosa substation	5/30/26	TBD	Solar & Battery Storage			0	
C2-10	Cluster 2	CA8	4/5/22	In Progress		NR/ER	LGI	No	500	500	Salt Lake	UT	PACE	Oquirrh substation	12/31/27	TBD	Battery Storage			0	
C2-11	Cluster 2	CA2	4/6/22	In Progress	PacifiCorp	ER	LGI	No	26	26	Carbon	WY	PACE	Shirley Basin substation	3/1/23	TBD	Wind			0	
C2-12	Cluster 2	CA1	4/6/22	In Progress	PacifiCorp	ER	LGI	No	42	42	Converse	WY	PACE	Windstar substation	3/1/23	TBD	Wind			0	
C2-13	Cluster 2	CA2	4/6/22	In Progress	PacifiCorp	ER	LGI	No	30	30	Carbon	WY	PACE	Foot Creek substation	3/1/23	TBD	Wind			0	
C2-14	Cluster 2	CA2	4/6/22	In Progress	PacifiCorp	ER	LGI	No	28	28	Carbon	WY	PACE	Freezeout substation	3/1/23	TBD	Wind			0	
C2-15	Cluster 2	CA2	4/6/22	In Progress	PacifiCorp	ER	LGI	No	6.6	6.6	Carbon	WY	PACE	Foot Creek substation	3/1/23	TBD	Wind			0	
C2-16	Cluster 2	CA12	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	300	300	Carbon	UT	PACE	Huntington-Spanish Fork transmission line	6/1/28	TBD	Pump Storage			0	
C2-17	Cluster 2	CA1	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Converse	WY	PACE	Dave Johnstn substation	6/1/28	TBD	Pump Storage			0	
C2-18	Cluster 2	CA20	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Klamath	OR	PACW	Malin-Summer Lake transmission line	6/1/28	TBD	Pump Storage			0	
C2-19	Cluster 2	CA4	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	1800	1800	Kootenai	ID	PACE	Bridger-Populas transmission line	6/1/28	TBD	Pump Storage			0	
C2-20	Cluster 2	CA2	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Sanpete	UT	PACE	Camp Williams-Four Corners transmission line	6/1/28	TBD	Pump Storage			0	
C2-21	Cluster 2	CA9	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Juab	UT	PACE	Mona substation	6/1/28	TBD	Pump Storage			0	
C2-22	Cluster 2	CA12	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Emery	UT	PACE	Emery substation	6/1/28	TBD	Pump Storage			0	
C2-23	Cluster 2	CA1	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Converse	WY	PACE	Amasa substation	6/1/28	TBD	Pump Storage			0	
C2-24	Cluster 2	CA15	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Grant	WA	PACW	Walla Walla-Wanapum transmission line	6/1/28	TBD	Pump Storage			0	
C2-25	Cluster 2	CA4	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Lincoln	WY	PACE	Bridger-Populas transmission line	6/1/28	TBD	Pump Storage			0	
C2-26	Cluster 2	CA20	4/7/22	In Progress	PacifiCorp	NR/ER	LGI	No	500	500	Lake	OR	PACW	Malin-Summer Lake transmission line	6/1/28	TBD	Pump Storage			0	
C2-27	Cluster 2	CA24	4/18/22	In Progress		NR/ER	LGI	No	100	100	Multnomah	OR	PACW	Troutdale substation	7/1/24	TBD	Battery Storage			0	
C2-28	Cluster 2	CA8	4/18/22	In Progress		NR/ER	LGI	No	199	199	Salt Lake	UT	PACE	Terminal substation	7/1/24	TBD	Battery Storage			0	
C2-29	Cluster 2	CA20	4/19/22	In Progress		NR/ER	LGI	No	340	340	Klamath	OR	PACW	Malin substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-30	Cluster 2	CA7	4/19/22	In Progress		NR/ER	LGI	No	199	199	Box Elder	UT	PACE	Bridgerland substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-31	Cluster 2	CA23	4/19/22	In Progress		NR/ER	LGI	No	199	199	Linn	OR	PACW	Fry substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-32	Cluster 2	CA7	4/26/22	In Progress		NR/ER	LGI	No	500	500	Lincoln	WY	PACE	Naughton substation	11/1/30	TBD	Nuclear			0	
C2-33	Cluster 2	CA16	4/27/22	In Progress		NR/ER	LGI	No	94	94	Yakima	WA	PACW	Midway-Union Gap transmission line	11/1/26	TBD	Solar & Battery Storage			0	
C2-34	Cluster 2	CA2	4/27/22	In Progress		NR/ER	LGI	No	506	506	Carbon	WY	PACE	Heward substation	12/31/24	TBD	Wind			0	
C2-35	Cluster 2	CA16	4/27/22	In Progress		NR/ER	LGI	No	80	80	Yakima	WA	PACW	Midway-Union Gap transmission line	12/31/25	TBD	Solar & Battery Storage			0	
C2-36	Cluster 2	CA9	4/28/22	In Progress		NR/ER	LGI	No	300	300	Utah	UT	PACE	Mercer substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-37	Cluster 2	CA9	4/28/22	In Progress		NR/ER	LGI	No	275	275	Juab	UT	PACE	Mona substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-38	Cluster 2	CA4	4/28/22	In Progress		NR/ER	LGI	No	300	300	Sweetwater	WY	PACE	Bridger substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-39	Cluster 2	CA14	4/28/22	In Progress		NR/ER	LGI	No	300	300	Iron	UT	PACE	Three Peaks substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-40	Cluster 2	CA20	4/28/22	In Progress		NR/ER	LGI	No	500	500	Klamath	OR	PACW	Klamath Falls-Lone Pine transmission line	12/31/25	TBD	Solar & Battery Storage			0	
C2-41	Cluster 2	CA15	4/28/22	In Progress		NR/ER	LGI	No	400	400	Asotin	WA	PACW	Talbot substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-42	Cluster 2	CA15	4/28/22	In Progress		NR/ER	LGI	No	100	100	Umatilla	OR	PACW	Wallula substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-43	Cluster 2	CA4	4/28/22	In Progress		NR/ER	LGI	No	600	600	Sweetwater	WY	PACE	Bridger substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-44	Cluster 2	CA20	4/28/22	In Progress		NR/ER	LGI	No	300	300	Klamath	OR	PACW	Chiloquin-LaPine transmission line	12/31/25	TBD	Solar & Battery Storage			0	
C2-45	Cluster 2	CA5	4/28/22	In Progress		NR/ER	LGI	No	600	600	Power	ID	PACE	Borah substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-46	Cluster 2	CA2	4/28/22	In Progress		NR/ER	LGI	No	600	600	Laramie	WY	PACE	Aeolus substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-47	Cluster 2	CA3	4/28/22	In Progress		NR/ER	LGI	No	160	160	Laramie	WY	PACE	Fort Sanders substation	12/31/25	TBD	Solar & Battery Storage			0	
C2-48	Cluster 2	CA7	5/3/22	In Progress	PacifiCorp	NR/ER	LGI	No	48	48	Lincoln	WY	PACE	Naughton substation	5/18/22	TBD	Natural Gas			0	
C2-49	Cluster 2	CA1	5/5/22	In Progress		NR/ER	LGI	No	150	150	Converse	WY	PACE	Amasa substation	12/1/26	TBD	Wind			0	
C2-50	Cluster 2	CA24	5/5/22	In Progress	PacifiCorp	NR/ER	LGI	No	300	300	Skamania	WA	PACW	Swift substation	6/1/28	TBD	Pump Storage			0	
C2-51	Cluster 2	CA24	5/5/22	In Progress	PacifiCorp	NR/ER	LGI	No	300	300	Clark	WA	PACW	Yale substation	6/1/28	TBD	Pump Storage			0	
C2-52	Cluster 2	CA1	5/6/22	In Progress		NR/ER	LGI	No	176	176	Natrona	WY	PACE	Casper-Riverton transmission line	11/30/25	TBD	Solar & Battery Storage			0	
C2-53	Cluster 2	CA1	5/6/22	In Progress		NR/ER	LGI	No	199.9	199.9	Cambell	WY	PACE	Pumpkin Butte-Wyodak transmission line	11/30/25	TBD	Wind			0	
C2-54	Cluster 2	CA4	5/6/22	In Progress		NR/ER	LGI	No	199.9	199.9	Lincoln	WY	PACE	Kingport-Midpoint transmission line	11/30/25	TBD	Solar & Battery Storage			0	
C2-55	Cluster 2	CA7	5/6/22	In Progress		NR	LGI	No	150	150	Lincoln	WY	PACE	Naughton-Treasureton transmission line	10/31/24	TBD	Battery Storage			0	
C2-56	Cluster 2	CA9	5/6/22	In Progress		NR/ER	LGI	No	199	199	Utah	UT	PACE	Clover-Limber transmission line	12/1/26	TBD	Solar & Battery Storage			0	
C2-57	Cluster 2	CA9	5/6/22	In Progress		NR/ER	LGI	No	199	199	Utah	UT	PACE	Clover-Limber transmission line	12/1/26	TBD	Solar & Battery Storage			0	
C2-58	Cluster 2	CA9	5/6/22	In Progress		NR/ER	LGI	No	199	199	Utah	UT	PACE	Camp Williams-Mercer #2 transmission line	12/1/26	TBD	Solar & Battery Storage			0	
C2-59	Cluster 2	CA9	5/6/22	In Progress		NR/ER	LGI	No	199	199	Utah	UT	PACE	Camp Williams-Mercer #2 transmission line	12/1/26	TBD	Solar & Battery Storage			0	
C2-60	Cluster 2	CA6	5/10/22	In Progress		NR/ER	LGI	No	199	199	Jefferson	ID	PACE	Jefferson substation	8/31/25	TBD	Solar & Battery Storage			0	
C2-61	Cluster 2	CA14	5/10/22	In Progress		NR/ER	LGI	No	199	199	Beaver	UT	PACE	Red Butte-Sigurd #2 transmission line	8/31/25	TBD	Solar & Battery Storage			0	
C2-62	Cluster 2	CA12	5/10/22	In Progress		NR	LGI	No	150	150	San Juan	UT	PACE	Abajo-Pinto transmission line	12/15/25	TBD	Solar			0	
C2-63	Cluster 2	CA7	5/10/22	In Progress		NR/ER	LGI	No	220	220	Uinta	WY	PACE	Railroad substation	9/1/26	TBD	Wind			0	
C2-64	Cluster 2	CA12	5/10/22	In Progress		NR/ER	LGI	No	150	150	Emery	UT	PACE	Emery substation	6/1/24	TBD	Solar & Battery Storage			0	
C2-65	Cluster 2	CA8	5/10/22	In Progress		NR/ER	LGI	No	150	150	Salt Lake	UT	PACE	Hoggard substation	6/1/24	TBD	Battery Storage			0	
C2-66	Cluster 2	CA8	5/10/22	In Progress		NR/ER	LGI	No	150	150	Weber	UT	PACE	West Ogden substation	6/1/24	TBD	Battery Storage			0	
C2-67	Cluster 2	CA8	5/10/22	In Progress		NR/ER	LGI	No	150	150	Salt Lake	UT	PACE	Parkway substation	6/1/24	TBD	Battery Storage			0	

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities

EXHIBIT NEWSUN/604

PacifiCorp Response to NewSun Data Request 48

UM 2032 / PacifiCorp
 June 8, 2022
 NewSun Information Request 48

NewSun Information Request 48

Please refer to the below spreadsheet. Please confirm that the final shortlisted projects from PacifiCorp’s 2020 All-Source RFP Final Shortlist as shown under the heading “UM 2059 Final Shortlisted Project data” are interconnecting to PacifiCorp under the queue numbers and information shown below from PacifiCorp’s OASIS under the heading “Interconnect Request Information.” In other words, please confirm that the below table correctly matches up the shortlisted projects with their interconnection queue positions. If not, please provide any corrections.

UM 2059 Final Shortlisted Project data										Interconnect Request Information												
Project Name	Type	Location	COD	Term/ Life (Years)	Resource Capacity (MW)	Battery Capacity (MW)	Battery Duration (Hours)	Q#	Request Date	Company Name	Service Type	Application Rules	Qualifying Facility Status	Max MW Output		Location of Generating Facility			Location of Interconnection	In-Service Date (Commercial Operations)		Type
														S	W	County	ST	Region		Customer Requested Commercial Operations Date	Agreed to Commercial Operations Date	
Anticline	NextEra	Wind WY	12/31/24	30	100.5	n/a	n/a	785	8/4/16	Anticline Wind, LLC	ER	LGI	NO	100	100	Natrona	WY	PACE	Claim Jumper – Casper 230 kV transmission line	12/31/19	12/31/24	Wind
Cedar Springs IV	NextEra	Wind WY	12/31/24	30	350.4	n/a	n/a	713	10/12/15	Cedar Springs Transmission LLC	ER	LGI	NO	350	350	Converse	WY	PACE	Yellowcake – Antelope Mine line	1/1/23	1/15/25	Wind
Rock Creek I*	Invenery	Wind WY	12/31/24	30	190	n/a	n/a	835	12/5/16	Rock Creek Wind, LLC	ER	LGI	NO	190	190	Carbon	WY	PACE	Foote Creek substation	10/1/24	12/15/24	Wind
Rock Creek II*	Invenery	Wind WY	12/31/24	30	400	n/a	n/a	836	12/5/16	Rock Creek Wind, LLC	ER	LGI	NO	400	400	Carbon	WY	PACE	Aeolus substation	10/1/23	12/15/24	Wind
Boswell Springs	Innergex	Wind WY	10/1/24	30	320	n/a	n/a	409	1/26/12	Boswell Wind Project I, LLC	ER	LGI	No	320	320	Albany	WY	PACE	Freezeout substation	9/30/14	12/31/24	Wind
Two Rivers	Blue Earth Renewables LLC & Clearway Renew LLC	Wind WY	12/31/24	25	280	n/a	n/a	719	11/11/15	Two Rivers Wind, LLC	NR	LGI	QF	280	280	Albany	WY	PACE	Freezeout substation	12/31/18	2/1/25	Wind
Cedar Creek	rPlus Energies	Wind ID	12/31/22	25	151	n/a	n/a	255	12/23/08	Cedar Creek Wind, LLC	ER	LGI	NO	151.8	151.8	Bingham	ID	PACE	Goshen-Sugar Mill transmission line	7/1/14	6/24/22	Wind
Steel Solar I & II	DESRI	PVS UT	12/31/23	25	147	37.5	2	794	5/25/16	Steel Solar, LLC	ER	LGI	NO	80	80	Box Elder	UT	PACE	Wheelon-Nucor transmission line	12/31/18	12/16/22	Solar & Battery Storage
Rocket Solar II	DESRI	PVS UT	12/31/23	25	45	12.5	4	862	9/20/16	Steel Solar, LLC	ER	LGI	NO	67	67	Box Elder	UT	PACE	Wheelon - Nucor transmission line	6/30/19	12/4/25	Solar & Battery Storage
Rocket Solar I	DESRI	PVS UT	12/31/23	25	45	12.5	4	862	4/6/17	Rocket Solar, LLC	ER	LGI	NO	45	45	Box Elder	UT	PACE	Lampo substation	6/30/19	12/15/23	Solar & Battery Storage
Fremont	Longroad Energy	PVS UT	11/30/23	20	99	49.5	4	634	11/20/14	Fremont Solar, LLC	ER	LGI	NO	99	99	Beaver	UT	PACE	Parowan-Sigurd line	12/31/18	9/25/23	Solar
Rush Lake	Longroad Energy	PVS UT	11/30/23	20	99	49.5	4	636	12/3/14	Rush Lake Solar, LLC	ER	LGI	NO	99	99	Iron	UT	PACE	Parowan-West Cedar line	12/31/18	9/29/23	Solar
Parowan	FirstSolar	PVS UT	12/31/24	25	58	58	4	642	2/9/15	Parowan Solar, LLC	ER	LGI	NO	58	58	Iron	UT	PACE	Parowan substation	10/1/18	12/31/24	Solar & Battery Storage
envo energy	envo energy	PVS UT	12/31/23	30	100	25	2	777	7/13/16	Hornshadow, LLC	ER	LGI	NO	100	100	Emery	UT	PACE	Emery substation	12/31/18	8/31/24	Solar & Battery Storage
Hornshadow II	envo energy	PVS UT	12/31/23	30	200	50	2	778	7/13/16	Hornshadow, LLC	ER	LGI	NO	200	200	Emery	UT	PACE	Emery substation	12/31/18	TBD	Solar & Battery Storage
Green River I & II	rPlus Energies	PVS UT	12/31/24	20	400	200	2	787	8/8/16	Green River Solar I, LLC	ER	LGI	NO	200	200	Emery	UT	PACE	Emery-Sigurd #2 line	11/15/18	8/15/24	Solar & Battery Storage
Hamaker	ecoplexus	PVS OR	12/31/23	30	50	12.5	4	905	7/12/17	Fresh Air Energy II, LLC	NR	LGI	QF	50	50	Klamath	OR	PACW	Copco 2 - Westside Tap to Klamath Falls line (Line 18)	12/1/19	2/1/23	Solar & Battery Storage
Hayden 2	ecoplexus	PVS OR	12/31/23	30	160	40	4	906	7/12/17	Fresh Air Energy II, LLC	ER	LGI	NO	80	80	Klamath	OR	PACW	Klamath Falls-Lone Pine transmission line	12/1/19	7/1/23	Solar & Battery Storage
Dominguez I	Able Grid	BESS UT	7/1/24	15	n/a	200	4	907	7/12/17	Fresh Air Energy II, LLC	ER	LGI	NO	80	80	Klamath	OR	PACW	Klamath Falls-Lone Pine transmission line	12/1/19	7/1/23	Solar & Battery Storage
Glen Canyon	sPower	Solar UT	12/31/23	30	95	n/a	n/a	805	9/30/18	Glen Canyon Solar A, LLC	ER	LGI	NO	95	95	Kane	UT	PACE	Sigurd-Glen Canyon transmission line	12/19/19	11/30/23	Solar

Response to NewSun Information Request 48

The queue numbers are accurate. Please refer to PacifiCorp’s Open Access Same-Time Information System (OASIS) webpage for any further questions or details. PacifiCorp’s OASIS webpage can be accessed by utilizing the following website link:

<http://www.oasis.oati.com/ppw/index.html>

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

Docket No. UM 2032

In the matter of

PUBLIC UTILITY COMMISSION OF
OREGON,

Investigation into the Treatment of Network
Upgrade Costs for Qualifying Facilities

EXHIBIT NEWSUN/605

PacifiCorp Response to NewSun Data Request 49

UM 2032 / PacifiCorp
June 8, 2022
NewSun Information Request 49

NewSun Information Request 49

Please confirm that the network upgrades required to interconnect PacifiCorp's final shortlisted projects from its 2020 All-Source RFP will be refunded to the interconnection customer (or PPA counterparty) in any form under PacifiCorp's OATT or LGIA, directly funded by PacifiCorp, or otherwise paid for ultimately by the utility or its ratepayers in any manner. For clarity, it appears that all of the indicated interconnections are FERC jurisdictional and subject to PacifiCorp's FERC filed OATT. Therefore, the LGIA would provide that the interconnection customer initially fund the network upgrades, which are then refunded to the interconnection customer upon commercial operations. Please confirm that this is occurring for each of the final shortlisted projects.

Response to NewSun Information Request 49

Per PacifiCorp's Open Access Transmission Tariff (OATT), all Federal Energy Regulatory Commission (FERC) jurisdictional generation interconnection requests will be refunded for any network upgrade costs paid for prior to commercial operation. Please refer to PacifiCorp's Open Access Same-Time Information System (OASIS) webpage which provides the jurisdiction of interconnection requests. PacifiCorp's OASIS webpage can be accessed by utilizing the following website link:

<http://www.oasis.oati.com/ppw/index.html>