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March 21, 2023

***VIA ELECTRONIC FILING***

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

**RE: LC 82— PacifiCorp's Motion for Extension of Time to File Long-Term Fuel Plan  
*Expedited Consideration Requested***

PacifiCorp d/b/a Pacific Power hereby submits for filing its Motion for Extension of Time to File Long-Term Fuel Plan with Expedited Consideration Requested.

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

Sincerely,

Matthew McVee  
Vice President, Regulatory Policy and Operations

Enclosures

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 82**

In the Matter of

PACIFICORP d/b/a PACIFIC POWER

2023 Integrated Resource Plan.

**PACIFICORP’S MOTION FOR  
EXTENSION OF TIME TO FILE  
LONG-TERM FUEL PLAN**

*Expedited Consideration Requested*

Pursuant to Oregon Administrative Rule (OAR) 860-001-0420, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully requests that the Public Utility Commission of Oregon (Commission) grant a 60-day extension of time to file an updated long-term fuel plan for the Jim Bridger plant (LTFP). The Company must file a new LTFP with its 2023 Integrated Resource Plan (IRP), which the Company will file on March 31, 2023. Granting the Company’s request here will align the submission of the LTFP with the commencement of the review process for the Company’s 2023 IRP, which was also extended 60-days from the March 31st filing date. The Company requests expedited consideration of the motion as the filing date of the 2023 IRP is on March 31, 2023.<sup>1</sup>

**I. BACKGROUND**

The Commission acknowledged PacifiCorp’s 2021 IRP at a special public meeting on March 29, 2022.<sup>2</sup> During that process, the Company agreed to file an updated LTFP with its 2023 IRP.<sup>3</sup> PacifiCorp typically files its IRPs at the end of March, consistent with its regulatory

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<sup>1</sup> OAR 860-001-420(6) requires that a moving party requesting expedited treatment confer with parties in the proceeding regarding the motion. However, as of the date of filing, there are no parties in this proceeding. The Company has served its Notice of Clean Energy Plan Filing Date and in the Alternative Motion for Extension on parties in Docket No. LC 77, PacifiCorp’s 2023 Integrated Resource Plan.

<sup>2</sup> *In the Matter of PacifiCorp d/b/a Pacific Power 2021 Integrated Resource Plan*, Docket No. LC 77, Order No. 22-178 at 1 (May 23, 2022).

<sup>3</sup> *Id.* at 8. As noted by the Commission, the Company also filed an updated LTFP in its 2023 TAM, docket UE 400, on April 15, 2022.

obligations across its six-state service area.<sup>4</sup> PacifiCorp therefore anticipated filing its updated LTFP at the end of March 2023 when it filed its 2023 IRP.

The Commission, however, subsequently modified the review process for the 2023 IRP schedule so review of the plan will not begin until 60-days after the plan is filed at the end of March.<sup>5</sup> This modification resulted from PacifiCorp's request for a waiver of the requirement that it submit a draft IRP for public review. When granting the waiver, the Commission amended the 2023 IRP review process "to include an additional initial stakeholder comment period followed by utility responses and associated IRP changes to be completed roughly 60 days from filing the IRP."<sup>6</sup> Under this modified process, upon filing the 2023 IRP at the end of March, there will be a "roughly 30-day window for public comments [on the filed 2023 IRP], followed by a roughly 30-day window for the Company to file reply comments and incorporate any changes resulting from this initial comment period."<sup>7</sup> Then, after the 60-day period has run (around May 31, 2023) the six month IRP review period set forth in OAR 860-027-0400(5) will commence. As a practical matter, this modified process means that the Company's 2023 IRP will not be finalized for purposes of the Commission's review process until around May 31st when the initial 60-day comment period closes.

## II. DISCUSSION

The Company's request for an extension of time to file its updated LTFP is reasonable because it will align the filing of the LTFP with the commencement of the Commission's review process for the 2023 IRP. The review period for the 2023 IRP effectively begins 60-days after

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<sup>4</sup> As a multijurisdictional utility, the IRP provides for system planning of all six of its service territories. PacifiCorp is required to file an IRP in Utah by March 31, 2023. *In the Matter of the Acknowledgment of PacifiCorp's Integrated Resource Plan*, Utah PSC Docket No. 09-2035-01, Order at 57 (April 1, 2010). Given that the IRP is a planning document for the Company's entire system, the IRP is filed in each state at around the same time for the purposes of transparency, consistency, and administrative efficiency.

<sup>5</sup> Following comments received at its last public stakeholder meeting, the Company has formally requested an extension of 60 days, until May 31, 2023, to file the 2023 IRP at the Utah Public Service Commission (Utah Commission). It will file the 2023 IRP at the Utah Commission as "informational" on March 31, 2023. *See, PacifiCorp's 2023 Integrated Resource Plan*, Docket No. 23-035-10, Rocky Mountain Power's Request for Extension (Mar.2, 2023).

<sup>6</sup> Docket No. LC 77, Order No. 23-011 at 1 (Jan. 26, 2023).

<sup>7</sup> *Id.* at App. A at 7.

the 2023 IRP is filed, which is when the LTFP will be filed. By aligning the filing of the LTFP and commencement of the IRP review process, the Company's request is consistent with the Commission's directive to submit an updated LTFP with the 2023 IRP. Moreover, because the extension will align filing of the LTFP with the beginning of the Commission's IRP review process, the extension will not delay or hinder review of the 2023 IRP.

The extension will also allow the Company to develop a LTFP that aligns with the 2023 IRP preferred portfolio and action plan. To develop a LTFP, the Company must first identify a resource portfolio that will inform the expected generation at the Jim Bridger plant. The 60-day extension will ensure that the Company has sufficient time to incorporate the preferred portfolio from the 2023 IRP into the LTFP. The long-term fueling strategy will therefore rely on the best available information and account for the expected changes in the Company's resource portfolio over the LTFP study period.

### III. CONCLUSION

For the foregoing reasons, PacifiCorp respectfully requests that the Commission grant a 60-day extension to file an updated LTFP to align the filing of the LTFP with the commencement of the review process for the 2023 IRP. The Company requests expedited consideration of this motion as the filing date of the 2023 IRP is March 1, 2023.

Respectfully submitted this 21<sup>st</sup> day of March 2023.



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