

March 12, 2021

VIA ELECTRONIC FILING

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

Attn: Filing Center

**RE: LC 77—Reply Comments to Sierra Club’s Comments Regarding PacifiCorp’s
Notification of September 1, 2021 Filing of its 2021 Integrated Resource Plan**

On February 12, 2021, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) filed notification with the Public Utility Commission of Oregon (Commission) that it is extending its anticipated filing date for the 2021 Integrated Resource Plan (IRP) from April 1, 2021 to no later than September 1, 2021 (February 12 Letter). On March 5, 2021, Sierra Club filed comments responding to the Company’s “request for an extension” to file its 2021 IRP. This letter responds to Sierra Club’s recommendations as unnecessary and only adding further delay to the Company’s preparation of its 2021 IRP.

Before addressing Sierra Club’s specific recommendation, the Company notes that under Oregon Administrative Rule (OAR) 860-27-0400(3), “[a]n energy utility must file an IRP within two years of its previous IRP acknowledgment order or as otherwise directed by the Commission.” The Commission acknowledged the Company’s 2019 IRP on May 7, 2020 with an acknowledgement order issued on June 8, 2020.¹ Thus, under OAR 860-27-0400(3), the Company’s next IRP, its 2021 IRP, is due on or before May 7, 2022. The Commission has issued no order setting forth an alternative filing date for the Company’s 2021 IRP. Typically, PacifiCorp files its IRP on or about April 1st of the IRP year.² However, as explained in the Company’s February 12 Letter, the Company has experienced modeling issues, which has caused it to revise its filing date for its 2021 IRP to on or before September 1, 2021. Also, a filing date of September 1, 2021, allows the Company to incorporate the results of the 2020 All-Source Request for Proposals (2020AS RFP) into the 2021 IRP.³ The Company’s February 12 Letter was a courtesy notice to the Commission given that the Company would have typically filed the 2021 IRP in April 2021. The new filing date of no later than September 1, 2021, is still compliant with Commission’s rules and, thus, an extension request is not required.

¹ *In re the Matter of PacifiCorp, dba Pacific Power, 2019 Integrated Resource Plan, Docket No. LC 70, Order No. 20-186 (June 8, 2020).*

² *In re the Matter of PacifiCorp, dba Pacific Power, 2013 Integrated Resource Plan, Docket No. LC 57, PacifiCorp 2013 Integrated Resource Plan (Apr. 30, 2013); In re the Matter of PacifiCorp, dba Pacific Power, 2015 Integrated Resource Plan, Docket No. LC 62, PacifiCorp 2015 Integrated Resource Plan (Mar, 31, 2015); and In re the Matter of PacifiCorp, dba Pacific Power, 2017 Integrated Resource Plan, Docket No. LC 67, PacifiCorp 2017 Integrated Resource Plan (Apr. 4, 2017).*

³ *In the Matter of PacifiCorp, dba Pacific Power, Application for Approval of 2020 All-Source Request for Proposals, Docket No. UM 2059.*

In its comments, claiming to be responding to the Company's "request for extension," Sierra Club recommends the Company file its 2021 IRP by July 15, 2021 instead of September 1, 2021. In exchange for the additional time, the Sierra Club recommends the Company be required to provide additional information for model runs with the 2021 IRP filing associated with certain hypothetical federal requirements.

PacifiCorp's transition to a new modeling system is ongoing and has faced unforeseen challenges. The extended filing date for the 2021 IRP allows the Company time to produce model outcomes and allow for stakeholder review and input. Following the 2019 IRP, PacifiCorp began the transition to using Energy Exemplar's Plexos models. This model provides multiple improvements to the IRP process, including greater granularity, greater ability to model reliability outcomes through inclusion of loss of load probability and planning reserve margin, the ability to include endogenous transmission modeling without including topology additions or other complex setups, and the ability to include greater analysis of resource retirements and options. PacifiCorp presented the benefits of the Plexos system to stakeholders during the June 2020 public-input meeting, and the model transition has been ongoing throughout the 2021 IRP development cycle.

However, the transition to the new model and the necessary setup activities to ensure model functionality have encountered challenges, which could not be foreseen until the inputs were setup in the model and PacifiCorp could start the portfolio development phase of the 2021 IRP development cycle. With modeling issues persisting, the revised filing date for the 2021 IRP ensures sufficient time to implement the new system and to seek stakeholder feedback on portfolio modeling outputs. As of today, PacifiCorp has not been able to produce any IRP portfolio results for cost and risk analysis and as such has been unable to receive stakeholders input on any modeling results. Furthermore, revising the filing date for the 2021 IRP to no later than September 1, 2021, allows the Company to incorporate the updated inputs that will occur from the 2020AS RFP final shortlist with the least disruption possible to the IRP process.

As the Company continues to set up the new modeling software and works toward a final shortlist in the 2020AS RFP, there are a number of changing variables that stakeholders will need an opportunity to provide input on. As listed in Table 1 below, PacifiCorp anticipates having the first modeling outputs ready to share in late April, with modeling refinements and inputs updated throughout the summer. A filing date for the 2021 IRP of no later than September 1, 2021 helps ensure sufficient stakeholder input on portfolio modeling. PacifiCorp will continue the public-input process throughout spring and summer 2021 and has scheduled additional public-input meetings to align with the updated IRP workplan. The Company's updated public-input schedule, which also reflects its workplan, allows additional time for establishing this new system, while ensuring that there is a robust and inclusive stakeholder process that accompanies the portfolio modeling process in Table 1 below. Table 1 reflects the steps the Company will make to achieve a 2021 IRP filing by no later than September 1, 2021.

Table 1: 2021 IRP Updated Public-Input Schedule/Workplan


Date	Activity	Tentative Detail
April 22-23, 2021	April Public-Input Meeting	Initial discussion of modeling results; opportunity for stakeholder feedback.
May 27-28, 2021	May Public-Input Meeting	Continued discussion of modeling results and opportunity for stakeholder feedback.
June 24-25, 2021	June Public-Input Meeting	Discussion of portfolios with incorporation of 2020AS RFP final short list results, discussion of cost and risk portfolio analysis; other scenarios / sensitivities; opportunity for stakeholder feedback
July 29-30, 2021	July Public-Input Meeting	Discuss preferred portfolio/cost and risk analysis; remaining scenarios / sensitivities; opportunity for stakeholder feedback.
August 12, 2021	August Public-Input Meeting	If needed

Sierra Club’s recommendation for a shorter seven-week extension to July 15, 2021, would not provide adequate time to work through modeling and incorporate the 2020AS RFP final shortlist while allowing for sufficient stakeholder consideration and feedback. PacifiCorp needs adequate time to work as expediently as possible to develop the IRP, seek robust and inclusive stakeholder feedback, and file the IRP with the regulatory commissions. PacifiCorp further notes that imposing modeling requirements in addition to the current requirements would only result in *more* time constraints and further delay the development of the 2021 IRP.

In summary, the Company properly provided notification to the Commission of its decision to revise the filing date of its 2021 IRP to on or before September 1, 2021. The filing date is complaint with OAR 860-27-0400(3), which requires the Company’s 2021 IRP to be filed on or before May 7, 2022. There is no Commission order directing the Company to file the 2021 IRP by another date other than established by in OAR 860-27-0400(3). The recommendation in Sierra Club’s comments responding to the Company’s “request for extension” is unworkable and would only further delay the Company’s filing.

Informal inquiries concerning this filing should be directed to Shay LaBray, Director of Resource Planning at (503) 813-6176 or Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,


Etta Lockey
Vice President, Regulation