

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • jog@dvclaw.com
107 SE Washington St., Suite 430
Portland, OR 97214

October 25, 2023

Via Electronic Filing

Public Utility Commission of Oregon
Attn: Filing Center
201 High St. SE, Suite 100
Salem OR 97301

Re: In the Matter of PACIFICORP d/b/a PACIFIC POWER,
2023 Integrated Resource Plan and Clean Energy Plan.
Docket No. LC 82

Dear Filing Center:

Please find enclosed the Comments of the Alliance of Western Energy Consumers (“AWEC”) in the above-referenced docket.

Please note that AWEC’s comments include Protected Information that is being handled in accordance with Order No. 23-132. The confidential version of AWEC’s comments has been encrypted with 7-zip software and is being transmitted electronically to the Commission and Qualified Persons.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Sincerely,

/s/ Jesse O. Gorsuch
Jesse O. Gorsuch

Enclosures

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served the **Confidential Comments of the Alliance of Western Energy Consumers** upon the parties shown below by sharing an encrypted copy via electronic mail.

Dated this 25th day of October, 2023.

Sincerely,

/s/ Jesse O. Gorsuch

Jesse O. Gorsuch

CITIZENS' UTILITY BOARD OF OREGON

John Garrett
Mike Goetz
610 SW Broadway, Suite 400
Portland, OR 97205
john@oregoncub.org
mike@oregoncub.org

PACIFICORP

Joseph Dallas
Matthew McVee
825 NE Multnomah Street
Suite 2000
Portland, OR 97232
joseph.dallas@pacificorp.com
matthew.mcvee@pacificorp.com

SIERRA CLUB

Rose Monahan
Leah Bahramipour
Sierra Club Law Program
2101 Webster St., Suite 1300
Oakland, CA 94612
rose.monahan@sierraclub.org
leah.bahramipour@sierraclub.org

NEWSUN ENERGY

Marie Barlow
Leslie Schauer
Jacob Stephens
NewSun Energy LLC
550 NW Franklin Ave.

PUC STAFF - DEPARTMENT OF JUSTICE

Johanna Riemenschneider
PUC Staff – Dept. of Justice
Business Activities Section
1162 Court St. NE
Salem, OR 97301-4096
johanna.riemenschneider@doj.state.or.us

PUC STAFF

JP Batmale
Public Utility Commission of Oregon
201 High St. SE
Salem, OR 97301
jp.batmale@puc.oregon.gov

RENEWABLE NORTHWEST

Diane Brandt
Max Greene
Renewable Northwest
421 SW 6th Ave, Suite 1400
Portland, OR 97204
diane@renewable.org
max@renewable.org

PINE GATE RENEWABLES

Dugan Marieb
Pine Gate Renewables
130 Roberts Street
Asheville, NC 28801
duganmarieb@pgrenewables.com

Suite 408
Bend, OR 97703
mbarlow@newsunenergy.net
leslie@newsunenergy.net
jstephens@newsunenergy.net

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 82

In the Matter of)	
)	
PACIFICORP, dba PACIFIC POWER,)	COMMENTS OF THE ALLIANCE OF
2023 Integrated Resource Plan and)	WESTERN ENERGY CONSUMERS
Clean Energy Plan.)	(REDACTED)
_____)	

I. INTRODUCTION

Pursuant to Administrative Law Judge Mapes’ October 11, 2023 Ruling, the Alliance of Western Energy Consumers (“AWEC”) provides the following comments on PacifiCorp dba Pacific Power’s (“PacifiCorp” or “Company”) 2023 Integrated Resource Plan (“IRP”) and Clean Energy Plan (“CEP”), filed on March 31, 2023 May 31, 2023, respectively.¹

II. COMMENTS

A. Summary

AWEC’s investigation of PacifiCorp’s IRP and CEP focused on determining whether the plans are sufficient to ensure compliance with Oregon HB 2021, “which directs utilities to reduce emissions levels below 2010-2012 baseline levels by 80% by 2030, 90% by 2035, and 100% by 2040.”² In accordance with Oregon Public Utility Commission (“Commission”) Orders Nos. 22-206, 22-446 and 23-060, the IRP and CEP plans should have sufficient information to:

¹ Docket No. LC 82, PacifiCorp’s 2023 Integrated Resource Plan (March 1, 2023) (“IRP”); PacifiCorp’s 2023 Integrated Resource Plan (May 1, 2023) (“Amended IRP”); and PacifiCorp’s 2023 Clean Energy Plan (May 31, 2023) (“CEP”).

² IRP at 39; *see also* HB 2021 § 3.

1. Demonstrate a legal and feasible compliance plan for HB 2021 emissions requirements, and
2. Quantify the incremental cost of compliance with HB 2021.³

Because PacifiCorp's plans fail to pass both these threshold requirements, the Commission should decline to acknowledge PacifiCorp's IRP and CEP; or alternatively only acknowledge specific portions of the IRP and CEP with conditions directing PacifiCorp to resolve the deficiencies described within these comments.

B. PacifiCorp's CEP is Unenforceable and Offers No Emissions Reductions.

PacifiCorp's emissions compliance targets are 1.79 MMT CO₂e in 2030, 0.89 MMT CO₂e in 2035, and zero in 2040.⁴ PacifiCorp's IRP preferred portfolio produces 2.5 MMT CO₂e in 2030, 1.07 MMT CO₂e in 2035, and zero in 2040.⁵ It is, however, unclear how PacifiCorp accomplishes zero emissions in 2040 under the preferred portfolio and the 2020 Protocol because PacifiCorp's system continues to produce emissions in 2040. Thus, the preferred portfolio is largely insufficient to meet the HB 2021 emissions requirements, and is clearly insufficient to meet the 2030 and 2035 targets.

³ See Docket No. UM 2225, Order No. 22-206 (June 3, 2022). ("Requires the first CEPs to be filed with next IRP and be consistent with the IRP analysis and IRP Action Plan and for the CEP to describes how the CEP and IRP meet HB 2021 requirements."); Order No. 22-446 (Nov. 14, 2022) ("Sets expectations for the analysis underlying the first CEP and associated IRP, including exploration of the key long-term decarbonization planning questions; evaluating emerging technologies, impacts of electrification and climate change, transmission constraints and expansion, and regional coordination; defining the certainty with which plans must meet emissions reduction levels across future conditions; expectations for modeling thermal resources; and additional accessibility requirements and standard data reporting expectations."); and Order No. 23-060 (Feb. 23, 2023) ("Sets additional expectations that the first CEP and associated IRP will provide a roadmap of actions that, at minimum, reduce emissions year-over-year and best balance cost, risk, pace of greenhouse gas emissions reductions, and community benefits and impacts), *available at*: <https://www.oregon.gov/puc/utilities/pages/hb2021-implementation-activities.aspx>

⁴ PacifiCorp CEP at 1.

⁵ 2023_Oregon_Clean_Energy_Plan_Data_Templates.xlsx tab "GHG Emissions".

Consequently, PacifiCorp proposes two potential pathways to achieve compliance with the 2030 80% carbon-free requirement in HB 2021. Pathway 1 reallocates gas-fired generation from Oregon to PacifiCorp’s other states, and thus the emissions associated with that generation. Pathway 2 relies on the [C]ompany’s ongoing multistate cost-allocation negotiation processes”⁶ and assumes that new large load is served through the Company’s voluntary renewable energy tariff. PacifiCorp claims that a benefit of its proposed approach is that PacifiCorp can achieve compliance with HB 2021 without taking “specific—and potentially costly—actions”,⁷ i.e., without reducing system emissions.⁸

There are two notable issues with both Pathways. First, PacifiCorp can guarantee neither outcome. Unless PacifiCorp is willing to risk under-recovery of costs, Pathway 1 requires the agreement of other states through the Framework Issues Workgroup. Pathway 2 requires customers to participate in a voluntary program. Second, PacifiCorp’s proposed compliance paths do not result in any measurable reduction in carbon emissions relative to PacifiCorp’s baseline IRP plan, but still result in material cost increases for Oregon customers. PacifiCorp achieves facial compliance by allocating non-emitting energy to Oregon while allocating emitting energy to other states. As an allocation exercise there is no net change in PacifiCorp’s carbon emissions. This is because the plan is simply a transfer of wealth from Oregon to non-Oregon jurisdictions in return for greenwashing Oregon energy.

⁶ PacifiCorp CEP at 4.

⁷ *Id.*

⁸ PacifiCorp’s CEP portfolio does have slightly lower emissions due to small-scale renewable additions. However, system emissions do not change between the use of the 2020 Protocol and other allocation methods.

From PacifiCorp’s perspective, there is a system benefit to achieving HB 2021 compliance without reducing system emissions. Specifically, system costs do not increase. However, there is a very large cost to Oregon because PacifiCorp arbitrarily allocates additional costs to Oregon. PacifiCorp’s allocation compliance proposal is dubious for three reasons. First, neither PacifiCorp nor the Commission can enforce compliance with Pathway 1 or Pathway 2 (again, unless PacifiCorp and the Commission are willing to risk PacifiCorp significantly under-recovering its costs under Pathway 1), meaning that compliance is uncertain even if the Commission approves one of these pathways. Second, it is unlikely that the intent of HB 2021 was to increase costs for Oregon ratepayers with no net reduction in emissions. Third, as discussed below, HB 2021 does not give the Commission authority to approve PacifiCorp’s CEP as filed.

C. Because the CEP is not Based on the 2020 Protocol, HB 2021 Prohibits the Commission from Approving the CEP Before Approving a New Allocation Methodology.

HB 2021 requires that “a clean energy plan developed by a multistate jurisdictional electric company *must* be based on or contained in other information developed consistent with a cost-allocation methodology approved by the commission.”⁹ As both Pathway 1 and Pathway 2 require a reallocation of resources relative to the 2020 Protocol, the existing approved cost-allocation protocol for PacifiCorp, the CEP is very clearly not based on the this allocation methodology, and the CEP provides no description of the cost allocation method the plan was based off of. Moreover, other states have not agreed to the allocation method PacifiCorp

⁹ HB 2021 Section 4(3)(b).
PAGE 4 – AWEC COMMENTS

proposes in the CEP and, obviously, the Commission has not approved this method. Indeed, PacifiCorp cannot even produce a functional cost allocation model implementing its allocation methodology.¹⁰ The Commission should not approve an alternate cost allocation methodology, or this CEP, without studying the specifics of the methodology; and under HB 2021 the Commission is prohibited from approving this CEP without first approving the allocation methodology on which it is based.

D. While the Cost impacts of the CEP are unclear, it is Likely that Pathway 1 and Pathway 2 Exceed HB 2021's Incremental Cost Cap.

Another consequence of PacifiCorp basing its CEP on an uncertain and unapproved cost allocation methodology is that the cost estimates of PacifiCorp's two compliance pathways are unreliable. These pathways do not address the impacts of alternate allocation methods on the allocation of existing resource costs. Table 16 of the CEP presents the cost impacts of PacifiCorp's proposal.¹¹ The table indicates the cost of compliance under Pathway 1 is \$212 million per year greater than the IRP preferred portfolio from 2030 to 2039 and \$394 million more per year than the IRP preferred portfolio from 2040 to 2042.¹² Under Pathway 2, the incremental cost relative to the IRP preferred portfolio is \$143 million from 2030-2039 and \$204 million from 2040 to 2042.¹³ The cost impacts of PacifiCorp's CEP are unclear because PacifiCorp's allocation methods are not transparent.

¹⁰ See Exhibit A (PacifiCorp's Supplemental Response to AWEC DR 7).

¹¹ PacifiCorp CEP at 68.

¹² *Id.*

¹³ *Id.*

PacifiCorp appears to allocate non-emitting resources based on [REDACTED] depending on the year.¹⁴ Emitting resources use this allocation until 2030, then switch to [REDACTED]¹⁵ Under the 2020 Protocol cost worksheets, emitting resources are allocated based on [REDACTED].¹⁶

Allocation changes only appear to apply to fixed and variable operating and maintenance costs and fuel. It is not clear that these allocations also apply to sales revenue or non-O&M costs, or other administrative overhead costs which may be impacted by the allocation of generation costs. Given this ambiguity, it is possible that when PacifiCorp reveals a more complete cost allocation model it will be discovered that the costs of Pathways 1 and 2 are actually greater than stated in the CEP. Given that PacifiCorp just recently submitted a material update to the costs of Pathways 1 and 2,¹⁷ the Commission should have little confidence that these costs are accurate.

Nevertheless, using PacifiCorp's numbers, Pathway 2 is the lower cost option of the two pathways presented, resulting in \$143 million in incremental costs from 2030-2039 and \$204 million from 2040 to 2042.¹⁸ PacifiCorp's Oregon revenue requirement in 2022 was \$1,265 million.¹⁹ PacifiCorp's Oregon revenue shows no trend from 2013 to 2022, so 2022 revenue

¹⁴ CONF_ST Cost Summary -23I.ST.RP.20.PA1_.EP.MM.PP-CEP OR SSR.20501 (LT. 20501 - 20548) CP1.xlsx tab "Generator" Column BA.

¹⁵ *Id.*

¹⁶ CONF_ST Cost Summary -23I.ST.RP.20.PA1_.EP.MM.PP-CEP OR SSR.20501 (LT. 20501 - 20548) v120.8.xlsx tab "Generator" Column BA.

¹⁷ LC 82 – PacifiCorp Errata Filing for Clean Energy Plan (Oct. 18, 2023).

¹⁸ PacifiCorp CEP at 68.

¹⁹ 2022 Oregon Utility Statistics, *available at*

<https://www.oregon.gov/puc/forms/Forms%20and%20Reports/2022-Oregon-Utility-Statistics-Book.pdf>

provides a reasonable basis for establishing the denominator of the HB 2021 6 percent cost cap. Under Section 12(4) of HB 2021, if the “actual or anticipated cumulative rate impact ... exceeds six percent of the annual revenue requirement for a year, the commission shall provide an exemption from further compliance with the requirements of [the carbon reduction provisions of HB 2021].” The first year where HB 2021 causes PacifiCorp to deviate materially from the IRP plan is 2030. At \$143 million, the first-year cost of compliance is 11.3 percent of Oregon revenue requirement. Thus, the first year of compliance action causes PacifiCorp to exceed the cost cap. By 2040 the cumulative cost of compliance is 16.1 percent of revenues. Under Pathway 1, which does not require assumptions about new load elections, the CEP cost is 16.8 percent of revenues in 2030 and 31 percent in 2040.

PacifiCorp’s cost impacts are also presented as levelized costs. PacifiCorp declined to provide these costs on a nominal basis.²⁰ Levelizing costs typically pushes costs of new resources into the future, which means that the near-term nominal cost of compliance is likely much greater than that reported by PacifiCorp. Given this and the potential additional cost impacts once PacifiCorp fully develops its cost allocation methodology, such as accounting for administrative overhead and other existing costs, the ultimate cost for this plan could greatly exceed 31 percent of current revenues.

E. PacifiCorp’s Allocations to Oregon Have Illogical and Unlawful Results.

PacifiCorp allocates ██████████ of the cost of a non-emitting peaker plant to Oregon under Pathway 1.²¹ It is unreasonable to allocate more than 100 percent of the cost of a resource,

²⁰ Exhibit A (PacifiCorp Response to AWEC DR 7, part b).

²¹ CONF_ST Cost Summary -23I.ST.RP.20.PA1_.EP.MM.PP-CEP OR SSR.20501 (LT. 20501 - 20548) CP1 tab “Generator” Column BA.

and likely unlawful as it requires customers to pay for a fictional resource that is not used and useful. PacifiCorp is likely using this allocation to fill in energy or capacity for reduced allocations of emitting resources. However, allocating more than 100 percent of a portfolio resource to Oregon illustrates that PacifiCorp's Pathway 1 cannot actually be accomplished with the CEP Portfolio, and requires assuming additional resources beyond those acquired in the CEP portfolio. This is problematic because all cost and emissions figures are based on the CEP portfolio, and ad-hoc changes to the portfolio invalidate all the cost and emissions measures used in Pathway 1.

F. PacifiCorp has not Optimized its Allocation Scheme for Oregon.

It is also unclear why PacifiCorp modifies the allocation of all emitting plants equally when it may be more cost effective to reduce only the allocation of the most costly emitting plants. The obvious reason is that, if Oregon is allocated less of the highest cost resources, other states will be allocated more of these resources, which other states will clearly be reluctant to agree to. Nevertheless, the Commission's obligation is to represent Oregon customers, not the customers of other states. Reduced allocation of emitting plants should be selected to minimize cost by considering MWh per MMT of CO₂e, MW of capacity per MMT of CO₂e, and cost per MMT of CO₂e. For example, the table below illustrates the MWh per unit of emissions for the Jim Bridger 1 Gas Conversion and Lakeside 1.²²

²² Based on CONF_ST Cost Summary -23I.ST.RP.20.PA1_.EP.MM.PP-CEP OR SSR.20501 (LT. 20501 - 20548) v120.8 emissions and generation.

Confidential Table 1



Jim Bridger produces much less energy per unit of emissions than Lakeside. This makes sense because gas conversions are not efficient and have high heat rates. There is much less replacement energy needed when reducing emissions from Jim Bridger relative to Lakeside. Suppose that to achieve compliance with HB 2021 PacifiCorp needs to reduce the allocation of emissions by 1 unit in 2030. If this reduction is accomplished by allocating a smaller share of Jim Bridger 1, Oregon will need to make up [REDACTED] MWh of lost energy from Jim Bridger 1. Assuming a cost for non-emitting energy of \$100 per MWh, the replacement cost of energy for reduced Jim Bridger allocation would be \$100 * [REDACTED], while the replacement cost of energy for reduced Lakeside allocation would be [REDACTED].

The additional cost of replacement energy should be weighed against differences in revenue requirement for Jim Bridger and Lakeside to determine the most economical unit to reduce allocations to Oregon. Continuing the above, reducing the allocation of Lakeside 1 could reduce allocation of Lakeside costs and reducing allocation of Jim Bridger would reduce allocation of Jim Bridger costs. These reduced costs mitigate or offset the cost of clean replacement energy. If the savings from reduced Lakeside allocations is sufficiently large, it may still be economical to reduce emissions through modifying Lakeside allocations rather than Jim Bridger allocations. To illustrate this, suppose reducing Lakeside allocation of emissions by one unit also reduces Lakeside cost allocations by \$10,000, while reducing allocation of Jim Bridger emissions by one unit only reduces cost allocations by \$2,000. The net cost of compliance is [REDACTED] for a Lakeside allocation solution and [REDACTED] for a Jim Bridger allocation solution.

PacifiCorp should perform an analysis for its next set of comments to determine the most cost-effective allocation scheme for Oregon.²³

III. CONCLUSION

As explained in detail above, PacifiCorp's IRP and CEP lack the information to demonstrate compliance with the Commission's Orders set forth in Docket No. UM 2225 and HB 2021 and cannot be acknowledged under HB 2021's requirements. It is also likely that both Pathway 1 and Pathway 2 exceed the incremental cost of compliance in HB 2021. The Commission should therefore decline to acknowledge PacifiCorp's IRP and CEP; or alternatively

²³ If gas conversions are found to be the most economic plants to avoid emissions from, PacifiCorp should also investigate whether gas conversion is economical from an Oregon perspective.

only acknowledge specific portions of the IRP and CEP with conditions directing PacifiCorp to resolve the deficiencies described within these comments.

Dated this 25th day of October, 2023.

Respectfully submitted,

DAVISON VAN CLEVE, P.C.

/s/ Lance D. Kaufman

Lance D. Kaufman

2623 NW Bluebell Place

Corvallis, OR 97330

lance@westernecon.com

Consultant for

Alliance of Western Energy Consumers

/s/ Tyler C. Pepple

Tyler C. Pepple

107 SE Washington St., Suite 430

Portland, OR 97214

(503) 241-7242 (phone)

(503) 241-8160 (facsimile)

tcp@dvclaw.com

Of Attorneys for

Alliance of Western Energy Consumers

LC 82 / PacifiCorp
October 12, 2023
AWEC Data Request 007

AWEC Data Request 007

Please refer to the PacifiCorp Oregon 2023 Clean Energy Plan, Table 15. Please provide the following information for the 2023 IRP Preferred Portfolio and the CEP portfolio.

- (a) For each study, please provide the annual revenue requirement and the Oregon- allocated revenue requirement under the 2020 Protocol, Path 1 allocations, and Path 2 allocations. Please include a functional cost allocation model for each allocation method.
- (b) If the annual revenue requirement in subpart (a) reflects levelized costs, please provide such data using non-levelized costs.
- (c) Please provide the allocation model used to calculate Oregon revenue requirement for subparts (a) and (b) above, for each portfolio under the 2020 Protocol, Path 1, and Path 2.
- (d) For each study, please provide total emissions and Oregon-allocated emissions under the 2020 Protocol, Path 1 allocations, and Path 2 allocations.
- (e) Please provide the annual revenue requirement for the Oregon allocation of existing resource costs, if such costs are not included in subparts (a) and (b) above.

Response to AWEC Data Request 007

Please refer to the Company's 2nd Supplemental response to OPUC Data Request 142 which provides corrected versions of the confidential "ST Cost Summary" report files, and certain non-confidential / public "ST Cost Summary" report files. Also provided in the Company's responses to OPUC Data Request 142 is an explanation of a processing error that was identified which led to the Company correcting the above referenced "ST Cost Summary" report files.

Based on the foregoing clarification, the Company responds as follows and advises that all references in this response to the confidential "ST Cost Summary" report files and certain non-confidential / public "ST Cost Summary" report files are to those provided with the Company's 2nd Supplemental response to OPUC Data Request 142:

- (a) Please refer to the Company's 2nd Supplemental response to OPUC Data Request 142, specifically Attachment OPUC 142-2 2nd Supplemental.

Each "ST Cost Summary" report describes a portfolio included in the CEP

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.

LC 82 / PacifiCorp
October 12, 2023
AWEC Data Request 007

under each set of allocation assumptions (or compliance pathways). In each “ST Cost Summary” report, tab “Cost Summary” describes the system-wide annual revenue requirements, and tab “CostSummaryByState – OR” describes the Oregon-allocated annual revenue requirements.

- (b) Cost data is included in the “ST Cost Summary” reports and is used to calculate the present value of revenue requirements (PVRR) which, in the context of the Integrated Resource Plan (IRP), includes levelized costs. The Company has not performed analysis to derive non-levelized costs.
- (c) Please refer to the Company’s 2nd Supplemental response to OPUC Data Request 142, specifically Confidential Attachment OPUC 142-1 2nd Supplemental which provides the set of confidential “ST Cost Summary” report files. The confidential versions of the “ST Cost Summary” reports contain resource-specific data on generation, costs and allocations with formulas intact, to create the tabs described in the Company’s response to subpart (a) above, calculating Oregon-allocated estimated revenue requirements for each portfolio.
- (d) Please refer to Attachment AWEC 007 which provides a reference list of all of CEP studies and the corresponding work papers.

Total system carbon dioxide equivalent (CO₂e) emissions are provided in the confidential work papers supporting PacifiCorp’s Clean Energy Plan (CEP), specifically reference each confidential file listed in Attachment AWEC 007, then tab “OR-IRP Master "CONF"”, column R “ODEQ Emission CO₂e” in the specific confidential file, which provides system emissions data.

Allocation to Oregon is provided as part of the non-confidential / public work papers supporting PacifiCorp’s CEP, specifically reference each non-confidential / public file listed in Attachment AWEC 007, then tab “OR HB 2021 DEQ-OR Allocated” in the specific non-confidential / public file.

- (e) The resource-specific costs allocated to Oregon is provided in the confidential “ST Cost Summary” report files, specifically tab “Generator”. The confidential “ST Cost Summary” report files are provided in Confidential Attachment OPUC 142-1 2nd Supplemental. Existing resources are not specifically categorized separately from proxy resource selections, but tab “Generator” can be filtered according to category.

Scenario/Study	Confidential File Name	Public File Name
CEP Portfolio-Pathway 1	IRP CEP Pathway 1 Workpaper CONF	IRP CEP Pathway 1 WorkpaperPUBLIC
CEP Portfolio-Pathway 2	IRP CEP Pathway 2 WorkpaperCONF	IRP CEP Pathway 2 WorkpaperPUBLIC
CEP Portfolio 2020 protocol	IRP CEP 2020 Protocol Workpaper CONF	IRP CEP 2020 Protocol Workpaper CONF
2023 IRP Preferred Portfolio (May) 2020 Protocol	IRP CEP Pathway 1 Workpaper CONF	IRP CEP Pathway 1 WorkpaperPUBLIC
CBRE Scenario	IRP CBRE 2020 Protocol WorkpaperCONF	IRP CBRE 2020 Protocol WorkpaperPUBLIC
CBRE Scenario-Pathway 1	IRP CBRE SSR Pathway 1 Workpaper CONF	IRP CBRE SSR Pathway 1 WorkpaperPUBLIC
CBRE Scenario-Pathway 2	IRP CBRE SSR Pathway 2 WorkpaperCONF	IRP CBRE SSR Pathway 2 WorkpaperPUBLIC
15% SSR Target Scenario	IRP 15 SSR 2020 Protocol WorkpaperCONF	IRP 15 SSR 2020 Protocol WorkpaperPUBLIC
15% SSR Target Scenario-Pathway 1	IRP 15 SSR Pathway 1 Workpaper CONF	IRP 15 SSR Pathway 1 WorkpaperPUBLIC
15% SSR Target Scenario-Pathway 2	IRP 15 SSR Pathway 2 WorkpaperCONF	IRP 15 SSR Pathway 2 WorkpaperPUBLIC
Accelerated SSR 2028 Target Scenario	IRP Acc SSR 2020 Protocol WorkpaperCONF	IRP Acc SSR 2020 Protocol WorkpaperPUBLIC
Accelerated SSR 2028 Target Scenario-Pathway 1	IRP Acc SSR Pathway 1 Workpaper CONF	IRP Acc SSR Pathway 1 WorkpaperPUBLIC
Accelerated SSR 2028 Target Scenario-Pathway 2	IRP Acc SSR Pathway 2 WorkpaperCONF	IRP Acc SSR Pathway 2 WorkpaperPUBLIC
No Purchases 2040 Scenario	IRP No Purch 2020 Protocol WorkpaperCONF	IRP No Purch 2020 Protocol WorkpaperPUBLIC
No Purchases 2040 Scenario-Pathway 1	IRP No Purch Pathway 1 WorkpaperCONF	IRP No Purch Pathway 1 WorkpaperPUBLIC
No Purchases 2040 Scenario-Pathway 2	IRP No Purch Pathway 2 WorkpaperCONF	IRP No Purch Pathway 2 WorkpaperPUBLIC

LC 82 / PacifiCorp
October 25, 2023
AWEC Data Request 007 – 1st Supplemental

AWEC Data Request 007

Please refer to the PacifiCorp Oregon 2023 Clean Energy Plan, Table 15. Please provide the following information for the 2023 IRP Preferred Portfolio and the CEP portfolio.

- (a) For each study, please provide the annual revenue requirement and the Oregon- allocated revenue requirement under the 2020 Protocol, Path 1 allocations, and Path 2 allocations. Please include a functional cost allocation model for each allocation method.
- (b) If the annual revenue requirement in subpart (a) reflects levelized costs, please provide such data using non-levelized costs.
- (c) Please provide the allocation model used to calculate Oregon revenue requirement for subparts (a) and (b) above, for each portfolio under the 2020 Protocol, Path 1, and Path 2.
- (d) For each study, please provide total emissions and Oregon-allocated emissions under the 2020 Protocol, Path 1 allocations, and Path 2 allocations.
- (e) Please provide the annual revenue requirement for the Oregon allocation of existing resource costs, if such costs are not included in subparts (a) and (b) above.

1st Supplemental Response to AWEC Data Request 007

Further to the Company’s response to AWEC Data Request 007 dated October 12, 2023, the Company provides the following additional response:

There are no “functional cost allocation” models to provide. The Oregon Clean Energy Plan (CEP) confidential and highly confidential “ST Cost Summary” report files for each portfolio include allocation factors and show the allocation factors that were applied to each resource over time to derive Oregon’s position in terms of both portfolio costs and emissions. Specifically, in the “ST Cost Summary” report files for each portfolio under each set of allocation assumptions, tabs “Generator” and “Battery”, and scroll over to the far-right columns for the resource-specific Oregon allocation assumptions.

Note: for the confidential “ST Cost Summary” report files, please refer to the Company’s 2nd Supplemental response to OPUC Data Request 142. As explained in the Company’s responses to OPUC Data Request 142, the confidential “ST Cost Summary” files required correction. For the highly confidential “ST Cost Summary” report files, please refer to the highly confidential work papers

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.

LC 82 / PacifiCorp
October 25, 2023
AWEC Data Request 007 – 1st Supplemental

accompanying PacifiCorp’s 2023 Integrated Resource Plan (IRP), highly confidential folder “LC-82 PacifiCorp CEP Highly Confidential Workpapers”.

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.