

September 9, 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—PacifiCorp's Reply Comments**

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) submits these comments in support of acknowledgment of the final shortlist in its 2020 All Source Request for Proposals (2020AS RFP) and in response to comments filed August 19, 2021, by the Public Utility Commission of Oregon (Commission) Staff (Staff) and the Oregon and Southern Idaho District Council of Laborers (LIUNA).<sup>1</sup>

**I. INTRODUCTION**

PacifiCorp respectfully requests the Commission acknowledge the Company's final shortlist of bidders in PacifiCorp's 2020AS RFP.<sup>2</sup> The solicitation process complied with the Commission's Competitive Bidding Rules<sup>3</sup> (Rules) and was transparent and fair to all bidders. The Commission approved the 2020AS RFP<sup>4</sup> and PacifiCorp conducted the solicitation process in accordance with the Commission's approval.

The 2020AS RFP was a fair, unbiased, and transparent process that included rigorous analysis of net benefits to customers and extensive oversight by two *independent* evaluators throughout the entire process. One independent evaluator, PA Consulting Group, was retained by PacifiCorp and appointed by the Commission (Independent Evaluator), and one was retained by the Public Service Commission of Utah. The Independent Evaluator concluded that the final shortlist "reflects a diverse portfolio of competitive resources which achieves resource adequacy and least cost goals."<sup>5</sup> The Independent Evaluator also found that PacifiCorp applied the RFP rules in an unbiased manner and was transparent throughout the process.<sup>6</sup> The Utah independent evaluator's final report, issued in September 2021,

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<sup>1</sup> PacifiCorp focuses these reply comments on replying to arguments that are relevant to acknowledgment of the final shortlist. Declining to address irrelevant arguments does not indicate agreement with those arguments.

<sup>2</sup> OAR 860-089-0500(2). See also, *In the Matter of the Pub. Util. Comm'n of Or., Investigation Regarding Competitive Bidding*, Docket No. UM 1182, Order No. 14-149 at 14 (Apr. 30, 2014) (adopting mandatory acknowledgement of final shortlists to "promote transparency in the utility procurement process").

<sup>3</sup> OAR 860-089.

<sup>4</sup> *In the Matter of PacifiCorp dba Pacific Power, Application for Approval of 2020 All-Source Request for Proposal*, Docket No. UM 2059, Order No. 20-228 (July 16, 2020).

<sup>5</sup> Independent Evaluator's Closing Report at 2 (June 15, 2021).

<sup>6</sup> *Id.*

generally reached the same conclusions as the Oregon Independent Evaluator; the solicitation process was very competitive and was fair, reasonable, and in the public interest, PacifiCorp effectively executed on its identified work and task flow, and the final shortlist portfolio represented a diverse portfolio of resources with a range of different characteristics, contract structures, and contract terms.<sup>7</sup>

The Commission-approved 2020AS RFP produced a robust market response that resulted in a final shortlist<sup>8</sup> consisting of:

- 1,792 MW of new wind capacity
  - a. 590 MW as build-transfer agreements (BTAs)
  - b. 1,202 MW as power purchase agreements (PPAs)
- 1,306 MW of solar capacity (PPAs)
- 697 MW of battery storage capacity
  - a. 497 MW of battery storage is paired with solar bids
  - b. 200 MW is standalone battery storage offered under battery-storage agreement (BSA).

Together, this least-cost, least-risk portfolio of bids will provide over 3,098 MW of zero-fuel-cost, emission-free generation and 697 MW of battery storage to serve PacifiCorp's customers consistent with the 2019 Integrated Resource Plan (IRP).

In reviewing the RFP final shortlist, the Commission must determine whether the final shortlist “appears reasonable at the time of acknowledgment and was determined in a manner consistent with the [Rules].”<sup>9</sup> The shortlist acknowledgment proceeding “has the same legal force and effect as a Commission-acknowledged IRP in any future cost recovery proceeding.”<sup>10</sup>

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<sup>7</sup> Shortlist Report of Merrimack Energy Group, Inc. To Utah Public Service Commission, PacifiCorp 2020 All Source Request for Proposals (2020AS RFP), Docket No 20-035-05, September 2021.

<sup>8</sup> During the process of updating the analysis of the bid portfolios, one bidder, DESRI, formally notified PacifiCorp on July 2, 2021 that they were withdrawing their Steel Solar I & II 147 MW solar plus 37.5 MW battery storage bid from final shortlist consideration due to site and project development concerns and could not commit to supporting their final shortlist bid through the remainder of the RFP process. PacifiCorp accepted their withdrawal on July 2, 2021. The final shortlist MWs reflect the removal of Steel Solar I & II and differs from PacifiCorp's Request for Acknowledgment of its Final Shortlist of Bidders filing on August 12, 2021.

<sup>9</sup> OAR 860-089-0500(1).

<sup>10</sup> OAR 860-089-0500(2).

In its comments to PacifiCorp's 2020AS RFP final shortlist, Staff indicates that it has confidence the final shortlist has been thoroughly assessed through a wide range of cost and risk scenarios and makes a number of recommendations to help ensure that the outcome of the 2020AS RFP is just and reasonable, while providing improvements for future RFPs.<sup>11</sup> LIUNA recommends that the Commission review the final shortlist for net benefits and costs which include consideration of workforce and equity issues envisioned by Oregon state policy.<sup>12</sup> PacifiCorp responds to the recommendations and/or assertions made by Staff and LIUNA below.

## **II. REPLY**

### **A. REPLY TO STAFF**

Staff supported several recommendations made by the Independent Evaluator. PacifiCorp will address those Independent Evaluator comments and recommendations as part of the response to Staff's comments.

#### **1. Non-compliance with Oregon Administrative Rules (OARs)**

In Staff's comments, Staff suggests that PacifiCorp did not comply with the Rules in the development and preparation of its 2020AS RFP leading up to PacifiCorp's submittal of its final shortlist, denying Staff and stakeholders adequate time to review the RFP scoring and modeling methodology.<sup>13</sup> PacifiCorp disagrees with Staff's position and believes the Company has met the Rules recognizing that the Rules allow for the use of waivers in specific instances, those waivers are at the discretion of the Commission, and the Company actually accommodated changes to its RFP schedule to allow Staff and stakeholders additional review time including a supplemental workshop to walk through the scoring and modeling methodology. Those changes are allowed and consistent with the Rules. In fact, in the Commission Order approving the 2020AS RFP, the Commission stated, "*With the consensus of Staff, the IE and the parties, we found that PacifiCorp complied with the rules and that the RFP, as modified based on our deliberation and decisions on the remaining contested issues, will result in a fair and competitive process.*"<sup>14</sup>

#### **2. RFP Complexity and Timeline**

Staff makes several observations surrounding the complexity and timeline of PacifiCorp's 2020AS RFP noting that on several occasions the RFP schedule was changed to accommodate further review by PacifiCorp, limiting the time available to the Independent

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<sup>11</sup> Staff Comments at 22.

<sup>12</sup> LIUNA Comments at 7.

<sup>13</sup> Staff Comments at 3

<sup>14</sup> *In the Matter of PacifiCorp, dba Pacific Power, Application for Approval of 2020 All-Source Request for Proposal, Docket No. UM 2059, Order 20-228 at 3 (July 16, 2020).*

Evaluator to complete their evaluation of results and the workpapers.<sup>15</sup> While PacifiCorp acknowledges the occasional delays, PacifiCorp does not agree that there was not enough time for the Independent Evaluator to complete their tasks. The Independent Evaluator recommended by Staff and approved by the Commission was selected based on their technical skills, access to world-wide staff, and national experience including the western United States. The Company worked with both Staff and the Independent Evaluator on changes in schedule and task modification and in no instance did the Independent Evaluator reject the schedule or task change as unacceptable, agreeing to deliver their evaluation based on the new schedule. In fact, PacifiCorp agreed to fund an additional scope of work at the request of Staff so that the Independent Evaluator could further evaluate several sensitivities brought forth by Staff. In all cases, PacifiCorp was open with the Independent Evaluator on changes occurring and had ongoing contact with the Independent Evaluator to provide additional guidance for their evaluation. In fact, it was known upfront through the Independent Evaluator selection process to all the bidders in the Independent Evaluator RFP, that the 2020AS RFP would be a large undertaking. The 2020AS RFP in spite of the large response was conducted in a fair and transparent basis as noted by the Independent Evaluator. During the months-long RFP process, PacifiCorp was responsive to all requests for information from the Independent Evaluator and Staff and conducted multiple meetings and workshops with the Independent Evaluator and Staff discussing the Company's process, scoring, and modeling and evaluation criteria. Staff suggests that PacifiCorp add staff and other resources to conduct future RFPs of the scale of the 2020AS RFP. PacifiCorp did, in fact, access additional support internally and externally to assist in due diligence and bid evaluation.

### **3. Requested Final Shortlist Bid Price Information**

Staff has requested, to assist stakeholders in cost recovery proceedings, that PacifiCorp include some additional bid costs and assumptions in these Reply Comments including the operations and maintenance assumptions for each BTA selected to the final shortlist and a table with the PPA price of the "best and final" bid from each PPA selected to the final shortlist.<sup>16</sup> That information is provided in Confidential Exhibit 1 Final Shortlist PPA Prices and Confidential Exhibit 2 Final Shortlist BTA O& M Assumptions subject to Protective Order 20-077. Confidential Exhibits 1 and 2 are attached to these comments.

### **4. Transmission Costs**

Staff has requested that PacifiCorp provide in future RFPs, a table of interconnection costs associated with each bid in the final shortlist, as was provided in a table in the Company's filing on August 4, 2021<sup>17</sup> which included up-to-date cost estimates for network upgrades associated with each project selected in the final shortlist. PacifiCorp finds that this is a reasonable request and will include this information on a going forward basis in future RFPs.

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<sup>15</sup> Staff comments at 19.

<sup>16</sup> Staff Comments at 3.

<sup>17</sup> OPUC Workshop 2020 All Source RFP Final Short List Sensitivities, August 5, 2021, Page 11.

## **5. Delivery Risk for Battery Storage Projects**

The Independent Evaluator in their closing report<sup>18</sup> identified a concern raised by PacifiCorp's outside engineering consultant, WSP USA (WSP)<sup>19</sup>, regarding delivery risk of battery storage projects amplified by the immaturity of battery storage technology and suggested that delivery risk be minimized through continued due diligence and steps to de-risk project delivery. Staff goes on to supplement the Independent Evaluator's comments by noting that the de-risk aspect could be accomplished in the contracting process. PacifiCorp's approach is very aligned with Staff and the Independent Evaluator's comments. First, PacifiCorp acknowledges that, relative to other technologies, there are relatively few installations of utility-scale battery storage assets. However, storage is an important resource that is expected to play a large capacity and reliability role as part of the Company's system. To that extent, PacifiCorp has continued to engage WSP's services in the ongoing contracting process. Second, WSP along with subject matter experts (SME)<sup>20</sup> across PacifiCorp have been engaged in updating the solar plus battery storage contract, focused on the protocols for development, operating, testing, and control of battery storage. Third, PacifiCorp also recognizes that the market may have working protocols already in place and available for adoption or modification by the Company. Lastly, PacifiCorp has expressed an interest in open conversations with bidders who have battery storage bids with the intent of securing contract terms that work for the bidder, the Company, and its customers. As allowed under the Rules, the Independent Evaluator and the Utah independent evaluator will be monitoring contract negotiations.

## **6. WSP Lowest Engineering Scores on the Final Shortlist**

Staff has requested that PacifiCorp identify if any of the six lowest engineering scores prepared by WSP and shown in Figure 4-2 of the Independent Evaluator's Closing Report are on the final shortlist. For clarity, Figure 4-2 is shown below with the six lowest ranked solar plus battery storage bids highlighted. It is important to note that WSP's engineering analysis was based on a matrix they had prepared to identify "red flags" which are considered weak or non-responsive on technical components of the bids regardless of resource type. WSP identified seven common "red flags" to be concerned about:

- Missing key information suggesting battery storage is an afterthought to the bid
- Major discrepancies (e.g., AC/DC coupling, inverter bi-directionality, grid charging)
- Questionable equipment (design choices/battery storage parameters)
- Lack of battery storage experience (development/construction/operation)
- Tight schedule including design or construction

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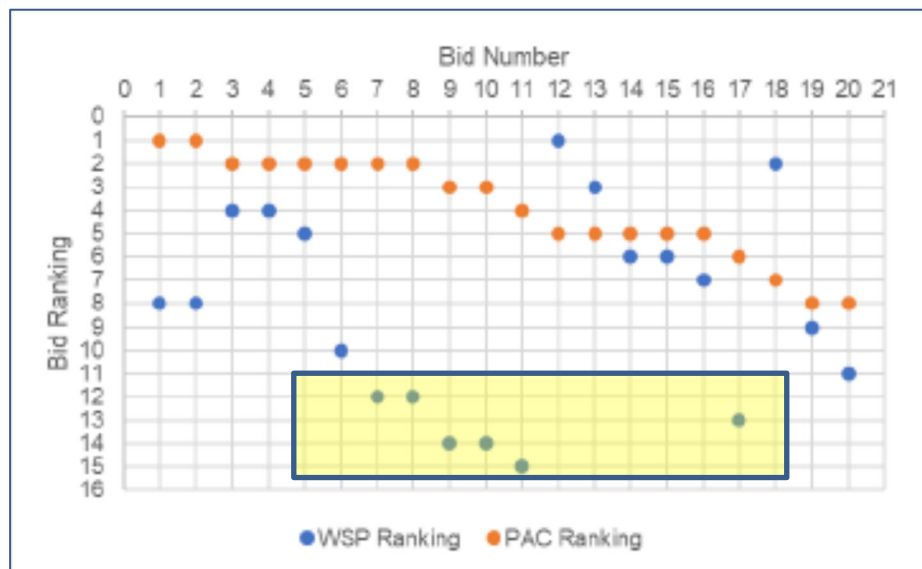
<sup>18</sup> Independent Evaluator's Closing Report at 29.

<sup>19</sup> PacifiCorp engaged WSP to provide an independent engineering review of the initial shortlist bids consistent with OAR. 860-089-0400(5)(a).

<sup>20</sup> PacifiCorp's SMEs included personnel from trading, generation dispatch, grid operations, engineering specifications, metering, PacifiCorp Transmission, and resource scheduling.

- Degradation and augmentation
- Minor discrepancies (e.g., Manufacturers, design life, power factor)

As mentioned by the Independent Evaluator, WSP conducted their evaluation with no communication or discussion of the bid with the bidder. Figure 4-2 focuses on solar plus battery storage which was one of the resource types that PacifiCorp specifically asked WSP to focus on due to its level of penetration in the industry.



Of the six bids highlighted in the graph above, three were selected to the final shortlist. It should be noted that those bids scored in the top five under PacifiCorp's non-price scoring criteria developed as part of the RFP review process and those bids were selected through the scoring and modeling process to reach the final shortlist. All three bids were identified to have four of seven "red flags", however two of the red flags (major discrepancies and minor discrepancies) were identified on a majority of the solar and battery storage bids. The other red flags were lack of battery experience (3 bids), augmentation flaws (2 bids), and tight schedule (1 bid). PacifiCorp and WSP both believe that with these bidders, the red flags could be explained and more importantly mitigated through increased and ongoing communication.

Nonetheless, PacifiCorp agrees with Staff's suggestion to retain WSP through the remainder of the RFP review and acknowledgement process, involving them in the review of technical aspects of the contracting process. Further, PacifiCorp will have on-going communication with bidders and monitoring access to the bidders' projects as the project moves through construction to commercial operation, which is a normal standard the Company applies to all its resource contracts.

## **7. Cluster Study Impact on the RFP**

Both Staff and the Independent Evaluator provided recommendations targeting the transition cluster study process including PacifiCorp Transmission providing more detailed estimates of time to complete an interconnection for those projects in the transition cluster study and PacifiCorp developing mechanisms to retain those bidders in future RFP processes who challenge the interconnection timeline provided by PacifiCorp Transmission through contract terms to shift schedule risk to the bidder.<sup>21</sup> PacifiCorp appreciates the recommendations and notes that both Staff and the Independent Evaluator also acknowledged the separation of PacifiCorp merchant function, which is running the RFP process, and PacifiCorp Transmission, which conducts the cluster study process per its Federal Energy Regulatory Commission (FERC) approved Open Access Transmission Tariff (OATT). This separation makes it difficult for PacifiCorp's merchant function to influence or change the cluster study process. That said, PacifiCorp also recognizes that within the confines of the OATT-defined annual cluster study process that the RFP must adhere to, there could be improvements to future RFP processes, timelines, and contractual provisions to allow bidders who have been selected to the initial shortlist to remain in consideration for a RFP final shortlist pending clarity around their interconnection timeline.

## **8. Bid Price Updates After the Cluster Study**

Staff supported the recommendation of the Independent Evaluator to investigate mechanisms to mitigate significant price increases between the original bid and the bid price update provided after the cluster study completion, either through shortening the time between bid submittal and bid price updates or contractual provisions to limit price escalation.<sup>22</sup>

PacifiCorp agrees that price escalation is certainly a risk when an RFP schedule is extended over a significant period of time. The Company has looked back over the 2020AS RFP schedule and based on the fixed timing and schedule of the transition cluster study as well as the timing of expiration of certain federal tax credits, notes that the ability to shorten the schedule was not available. PacifiCorp also notes that its experience from past RFPs is that any form of cap on price escalation may result in a price premium during the initial bid to cover their price risk from holding a bid open for a significant time. This was supported during development of the RFP in discussions with potential bidders and stakeholders. That said, PacifiCorp has implemented price escalation caps on bid price updates in past RFPs and will strongly consider returning to price escalation caps going forward because future RFP schedules are not anticipated to be shorter in length.

## **9. StorageVet Model Development**

Staff supports the recommendation by the Independent Evaluator for PacifiCorp to work with the developers of the StorageVet model to provide feedback on the performance of StorageVet in the 2020AS RFP. PacifiCorp is investigating other alternatives for modeling

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<sup>21</sup> Staff Comments at 20 and Independent Evaluator's Closing Report at 48.

<sup>22</sup> Staff Comments at 20 and IE Closing Report at 48.

of battery storage system including the use of Plexos, the production cost model the Company used for its 2021 IRP. That said, PacifiCorp believes there is merit to this recommendation and will provide comments to the developers of StorageVet related to its use within PacifiCorp's 2020AS RFP and suggested improvements based on our observations and experience.

## **10. Revenue Requirement**

Staff has requested that PacifiCorp address the Independent Evaluator's suggestion that PacifiCorp's portfolios are provided on a levelized revenue requirement basis, front loading the recovery of later costs, when it may be more appropriate to reflect capital additions on a forecasted timing basis.<sup>23</sup> For modeling purposes, the Company levelizes the revenue requirement of each RFP bid and future proxy resource over its contract term or life. This ensures the IRP study horizon includes costs that are reasonably commensurate with the benefits the resource provides. In actual ratemaking, capital cost recovery is highest in year one and declines as a result of depreciation over the life of an asset. If depreciating resource costs were to be used for new resources, the model would be disincented to add resources near the end of the study horizon, because those resources would have a high up-front cost and very few years to depreciate. This outcome is shortsighted as it fails to appropriately balance the costs and benefits of resource additions over their expected lives, so it is not used for portfolio development and selection. However, the Company recognizes that rate impacts are highly relevant to customers, so it also produced a nominal revenue requirement view that reflects impact of capital additions and depreciation. Because most of the bids in the 2020AS final shortlist are PPAs with flat or escalating contract costs, rather than utility assets with declining revenue requirements, the nominal revenue requirement results do not have a spike in up-front costs. In addition, production tax credits (PTCs) for BTA bids also act to counter the up-front nominal revenue requirement. For levelized and nominal revenue requirement impacts of the portfolio including the final shortlist relative to other candidate portfolios, please refer to Figure 4 and Figure 11, respectively in the Company's Aug. 12, 2021 Update to Request For Acknowledgment filing. While the mix of PPA and BTA costs impacts the overall trend in the nominal revenue requirement, the year-to-year variability largely reflects changes in the timing of future resources between portfolios.

## **11. PTC Extension Portfolio**

Staff has requested that PacifiCorp address the Independent Evaluator's concern that the impact of the federal tax credit extension may have been too limited and was unable to determine based on the detail provided if a longer federal tax credit extension provides significant benefit without an additional scenario being run reflecting no selected RFP bids and a SNST<sup>24</sup> price / policy scenario.<sup>25</sup> The SNST sensitivity prepared by the Company was proposed by Staff and reflects assumptions that were developed collaboratively. The results

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<sup>23</sup> Independent Evaluator Sensitivity Analyses Report at 27.

<sup>24</sup> SNST: no market sales, medium (reference) price, and PTC/ITC extension.

<sup>25</sup> Independent Evaluator Sensitivity Analyses Report at 27.



of that sensitivity indicate that bid selection would not change as a result of extended opportunities to capture tax credits, indicating that the bids provide benefits that are not matched by future proxy resource options. While the Company agrees that some combination of policy conditions and future proxy resource costs could lead to no RFP bids being selected, and that future tax policy could provide benefits to customers, the sensitivity was designed to evaluate the Company's bid selection. Notwithstanding that the analysis could have been performed differently or quantified other impacts, the fact that bid selections are unchanged in the SNST sensitivity indicates that the final shortlist results are robust under a range of tax policies, which was the intent.

## **12. Wind Curtailment Risk**

Staff notes that wind curtailment in Eastern Wyoming could be an issue given the limited transmission capacity and asked the Company to identify whether wind curtailment was addressed and quantified in the final shortlist portfolio determination including the application of such risk in the NPVRR of the portfolios and the sensitivity analyses.<sup>26</sup> PacifiCorp's modeling incorporates a range of wind generation levels such that the resources in Eastern Wyoming sometimes fill the modeled transfer capability of Energy Gateway South and the existing transmission out of the area. When wind output results in generation that fills available transmission, the model backs down the highest cost resources first, starting with thermal generation, followed by wind resources that do not qualify for PTCs, followed by wind resources with the lowest PTC value (60 percent PTC resources are curtailed before 100 percent PTC resources). The reduction in system costs from backing down value of thermal generation in Eastern Wyoming is relatively low, as it has the lowest-cost coal supplies in the Company's portfolio. There is little or no reduction in system costs when wind resources without PTCs are backed down, and there is an increase in system costs, as a result of lost PTCs, when PTC-eligible resources are backed down. The impacts each of these conditions are already reflected in the Company's reported results for every portfolio and confidential details on the output of individual resources have been provided as part of the Company supporting documentation. Over time, back down of low-cost resources in Eastern Wyoming generally declines as a result of resource retirements (notably Dave Johnston at the end of 2027) and expiring contracts. This is countered somewhat by proxy wind resource additions, for instance the SNS Bid-LN portfolio includes additional Eastern Wyoming wind in 2028, 2036, and 2037. Once PTC eligibility has expired, wind resources may also be backed down to allow imports of solar resources from southern Utah, based on economics. Actual wind output could be higher or lower than that modeled, so the actual level of backdown or curtailment will vary.

The Company would note that no wholesale market sales are modeled in Eastern Wyoming (in any studies, not just the "No Sales" studies). In reality, the Company periodically enters bilateral transactions to sell to other utilities from points in eastern Wyoming. In addition, the Energy Imbalance Market (EIM) or future organized markets may also provide opportunities to sell economic generation output to other participants, using transfer

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<sup>26</sup> Staff Comments at 21.

capability that is not represented in the Company's modeled results. The Company has not quantified or included any benefits associated with bilateral or EIM sales of resources in Eastern Wyoming.

### **13. RFP Time Horizon**

Staff supports the IE's recommendation to explore ways to put greater evaluation weight on portfolio value in earlier years in the planning horizon or potentially in certain key years.<sup>27</sup> Staff suggests that PacifiCorp consider higher discount rate be applied over a few key portfolios as a test to determine if those portfolios are influenced by proxy resource decisions late in the planning horizon.<sup>28</sup> PacifiCorp appreciates Staff's suggestion with regard to focusing on the timing of portfolio impacts. While the Company recognizes that near term impacts are more certain than those toward the end of the study horizon, it would also caution that the resource decisions in this proceeding will impact customer rates well beyond that horizon as well, as the current results only extend through 2038. Rather than modifying the discount rate and considering alternative present values, PacifiCorp recommends reviewing the stream of annual results to identify trends and timing that are key drivers for planning and may be qualitatively counted in favor or against particular portfolios. For example, Figure 4 and Figure 11 in the Company's Aug. 12, 2021 Update to Request For Acknowledgment filing provide annual cost comparisons that can be used for this purpose.<sup>29</sup>

### **14. Information and Transparency for Bidders**

Staff supports the Independent Evaluator's recommendation of providing additional information on the Company's capacity need and renewable penetration in its future RFPs along capacity contribution values for various resource types.<sup>30</sup> The expectation is that with penetration levels and capacity contribution values being made available to bidders in the RFP, bidders would have better information on PacifiCorp's system needs and be able to differentiate between a higher cost but higher value resource versus a low cost low value resource. PacifiCorp would caution that capacity need, capacity contribution, resource value, and targeted penetration levels are dynamic and subject to change as a result of resource decisions that will be made today and over time. Those resource decisions in turn are ultimately dependent on resource cost, both for an individual asset and the constellation of other potential resources in the Company's portfolio. Because of the dependence on these other factors, the Company cannot provide information necessary to definitively identify the ideal configuration for a given resource type. That said, it may be possible to address this issue in another way. One of the key resource configuration decisions impacted by these data points is the size and duration of co-located storage. Because common storage technologies are modular, bidders may be able to offer flexibility such that certain parameters of the final

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<sup>27</sup> Independent Evaluators Sensitivity Analyses Report at 27.

<sup>28</sup> Staff Comments at 21.

<sup>29</sup> PacifiCorp's Update to Request for Acknowledgment of Final Shortlist of Bidders in 2020AS RFP at 13 and 25.

<sup>30</sup> Staff Comments at 21.

storage configuration are identified by the Company at the end of the RFP process, rather than up front in the bid. This could reduce the need for capacity information and allow for more cost-effective outcomes, but it would need to be acceptable to bidders and align with RFP and interconnection rules, so the potential flexibility may be limited. PacifiCorp understands the request and will investigate ways to ensure bids can be targeted to its needs, including provision of more granular information for bidders, potentially incorporating results out of its IRP.

## **B. REPLY TO LIUNA**

LIUNA is an organization that represents over 4,000 members in Oregon employed in the construction industry and submitted comments on PacifiCorp's final shortlist and the Independent Evaluator's closing and sensitivity reports. LIUNA's position is that the 2020AS RFP was flawed in that its results only considered price-based risk factors and ignored other specific benefits and risks. Further, LIUNA contends that the 2020AS RFP fails to account for House Bill 2021 requirements in Oregon and does not reflect the broader public policy and equity considerations.<sup>31</sup> PacifiCorp does not agree with LIUNA's position on the 2020AS RFP. The 2020AS RFP was prepared in accordance with Oregon's Competitive Bidding Rules and was approved for release by the Commission in Order 20-228 on July 16, 2020 before the passage of House Bill 2021. The 2020AS RFP has been conducted for the benefit of all of PacifiCorp's customers across its six-state territory, not just for the benefit of Oregon and its construction industry. The 2020AS RFP has been conducted in a fair and transparent manner under the oversight of two independent evaluators as well as Commission Staff and review by stakeholders resulting in the selection of several thousand megawatts of new renewable resources including two large solar and battery storage projects in Oregon.

## **III. CONCLUSION**

PacifiCorp requests the Commission's acknowledgement of the Company's final shortlist of bidders in PacifiCorp's 2020AS RFP. The results of the 2020AS RFP confirmed that the final shortlist projects are the least-cost, least-risk resources to implement the 2019 IRP action plan. The 2020AS RFP was well received by the market and resulted in robust competition among bidders. The 2020AS RFP results demonstrate increased customer benefits from the new resources on the final shortlist, in combination with construction of the Gateway South and Gateway West Subsegment D.1 transmission lines and associated infrastructure (transmission projects). When applying medium natural gas price and medium CO<sub>2</sub> price-policy assumptions, present value customer net benefits from the final shortlist, after accounting for the cost of the transmission projects and all interconnection network upgrades, totals \$630 million relative to a case where no final shortlist bids are procured. When nominal annual revenue requirement is evaluated against a case without procurement of bids, customer costs are reduced in 12 of 15 years over the period 2024 through 2038.

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<sup>31</sup> Comments of Oregon and Southern Idaho District Council of Laborers (LIUNA) at 1.

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Commission acknowledgement of the 2020AS RFP final shortlist will enable PacifiCorp to effectively negotiate with final-shortlist bidders for the lowest price and acceptable terms to maximize customer benefits.

If you have questions about this filing, please contact Cathie Allen, Manager, Regulatory Affairs, at (503) 813-5934.

Sincerely,

A handwritten signature in blue ink that reads "Shelley McCoy". The signature is written in a cursive, flowing style.

Shelley McCoy  
Director, Regulation

cc: Service lists for UM 2059, UE 374, LC 70, and UM 1540

**REDACTED**

**Exhibit 1**

REDACTED

Name	Bidder	Type	Location	COD	Term/Life (Years)	Resource MW	Battery MW	Battery Duration (Hrs)	Bid PPA Price (\$/MWh)	Bid PPA Price (Fixed / Esc)	Bid Battery Price (\$/kW-Month) (based on Battery MW)
Anticline	NextEra	Wind	WY	1/1/2025	30	100.5	n/a	n/a			
Cedar Springs IV	NextEra	Wind	WY	1/1/2025	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	BlueEarth Renewables LLC and Clearway Renew LLC	Wind	WY	12/31/2024	25	280	n/a	n/a			
Cedar Creek	rPlus Energies	Wind	ID	049/01/2023	25	151	n/a	n/a			
Rocket Solar II	DESRI	PVS	UT	12/31/2023	25	45	12.5	4			
Fremont	DESRI	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	Longroad Energy	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	AES	PVS	UT	12/31/2023	30	95	n/a	n/a			

**REDACTED**

**Exhibit 2**

Rock Creek I		
Year	O&M (\$) (Nominal)	Annual O&M Capital Additions (\$) (Nominal)
2024		
2025		
2026		
2027		
2028		
2029		
2030		
2031		
2032		
2033		
2034		
2035		
2036		
2037		
2038		
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2051		
2052		
2053		

Rock Creek II		
Year	O&M (\$) (Nominal)	Annual O&M Capital Additions (\$) (Nominal)
2024		
2025		
2026		
2027		
2028		
2029		
2030		
2031		
2032		
2033		
2034		
2035		
2036		
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2040		
2041		
2042		
2043		
2044		
2045		
2046		
2047		
2048		
2049		
2050		
2051		
2052		
2053		



## CERTIFICATE OF SERVICE

I certify that I served a true and correct copy of PacifiCorp's Reply Comments on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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Dated this 9<sup>th</sup> day of September, 2021.



Katie Savarin  
Coordinator, Regulatory Operations

## CERTIFICATE OF SERVICE

I certify that I delivered a true and correct copy of PacifiCorp's **Reply Comments** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

### Service List UE 374

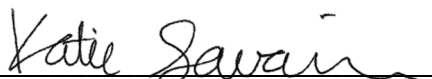
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Dated this 9<sup>th</sup> day of September, 2021.

  
Katie Savarin  
Coordinator, Regulatory Operations

## CERTIFICATE OF SERVICE

I certify that I filed a true and correct copy of PacifiCorp's **Reply Comments** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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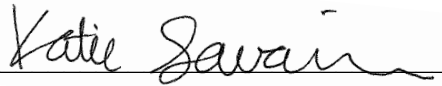
I certify that I electronically filed a true and correct copy of PacifiCorp's **Reply Comments** on the parties listed below via electronic mail in compliance with OAR 860-001-0180.

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Katie Savarin  
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