

April 14, 2022

***VIA ELECTRONIC FILING***

Public Utility Commission of Oregon  
Attn: Filing Center  
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Salem, OR 97301-3398

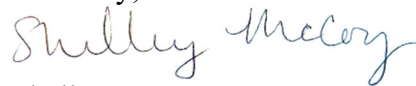
**RE: UM 2143—PacifiCorp’s Comments on Staff’s March 24, 2022 Report**

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides these comments in response to the March 24, 2022 report on resource adequacy (Report) provided by the Staff of the Public Utility Commission of Oregon (Commission Staff). The Company appreciates the significant effort and analysis that has characterized Commission Staff’s approach to Resource Adequacy (RA) in this docket. As PacifiCorp has noted in previous comments, Commission Staff’s approach on this issue has illustrated careful consideration of stakeholder input and diligence in exploring RA issues. PacifiCorp reiterates this sentiment with regards to Commission Staff’s latest Report.

PacifiCorp is supportive of the language in the Report that any “state requirements would be designed to operate in a complimentary manner with Regional RA programs, such as the [Western Resource Adequacy Program (WRAP)].”<sup>1</sup> PacifiCorp continues to support the integral work being done through the regional WRAP program, and would continue to advocate for the Commission to adopt the WRAP requirements by reference for load serving entities that participate in that program. This provides a consistent regional approach for Oregon to draw upon with regards to resource adequacy.

PacifiCorp also supports the concerns raised by Commission Staff regarding the “seams issues” for long-term opt out customers of Energy Service Suppliers. PacifiCorp supports the continued evaluation of this issue in Phase 2, and simply notes that Resource Adequacy obligations should not be shifted to utilities and their customers. PacifiCorp looks forward to continuing to work with Commission Staff in Phase 2 to resolve the outstanding issues that remain in this proceeding. PacifiCorp understands that much of the details for this process will be developed in Phase 2 and looks forward to participating in those discussions and the informal rulemaking process that has been identified.

Sincerely,



Shelley E. McCoy  
Director, Regulation

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<sup>1</sup> UM 2143 Investigation into Resource Adequacy in the State – Staff Report at 8 (Mar. 24, 2022).