



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

February 23, 2022

VIA ELECTRONIC FILING

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

RE: LC 77—PacifiCorp's Motion to Extend Filing Date of Responses to Certain Bench Requests – *Expedited Consideration Requested*

PacifiCorp d/b/a Pacific Power encloses for filing PacifiCorp's Motion to Extend Filing Date of Responses to Certain Bench Requests – *Expedited Consideration Requested* in the above-referenced docket.

Informal inquiries may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

Shelley McCoy
Director, Regulation

Enclosure

**BEFORE THE PUBLIC UTILITY
COMMISSION OF OREGON**

LC 77

In the Matter of
PACIFICORP, d/b/a PACIFIC POWER,
2021 Integrated Resource Plan

**MOTION TO EXTEND FILING DATE OF
RESPONSES TO CERTAIN BENCH
REQUESTS**

Expedited Consideration Requested

Under Oregon Administrative Rules (OAR) 860-001-0420, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully requests that the Public Utility Commission of Oregon (Commission) extend the date to March 4, 2022 for the filing of the responses to the bench requests 1, 6, and 7 issued by the Commission in the above referenced docket on February 17, 2022. The Company will file the responses to bench requests 2, 3, 4, and 5 by 1 pm on February 23, 2022 as directed by the Commission. The Company requests expedited consideration of this motion given that the responses are due at 1 pm today.¹

Upon receipt of the bench requests, PacifiCorp began immediately to prepare the responses to all the bench requests. Bench request 1 required the Company to perform a sensitivity that removes any take or pay assumptions in PLEXOS in any years there is an exiting contract in addition to additional optionality for the timing of certain coal unit retirements. The modeling for the requested sensitivity is taking longer than expected. PacifiCorp concluded late in the afternoon on February 22, 2022, that it would not be able to complete the sensitivity, develop the requested data and analysis, and do all necessary

¹ The Company conferred with parties via email concerning its request the morning of February 23 and at the time of filing it had not heard back from parties.

verification of results by 1 pm on February 23. The response to bench request 1 also impacts the response to bench requests 6 and 7.

PacifiCorp understands that this impacts the agenda for the workshop scheduled on February 24. The Company does not make its request lightly as it understands the impacts of its request on the Commission's schedule given its workload. In order to engage in a full discussion of these bench request responses, the Company respectfully requests that the Commission incorporate in the agenda for the workshop scheduled on March 8 to discuss the responses to bench requests 1, 6, and 7 and/or add an additional workshop to the schedule.

For these reasons, PacifiCorp respectfully requests extending the filing date of the responses to bench requests 1, 6, and 7.

Respectfully submitted this 23rd day of February 2022.

By:



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