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Portland, Oregon 97232

December 13, 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, d/b/a Pacific Power, 2021 Integrated Resource Plan

PacifiCorp d/b/a Pacific Power submits for filing PacifiCorp's Motion for Waiver of Integrated Resource Plan Guideline 2(c) in the above referenced docket.

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

Sincerely,

Matthew McVee
Vice President, Regulatory Policy and Operations

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 FOR WAIVER OF
INTEGRATED RESOURCE PLAN
GUIDELINE 2(c)**

Pursuant to Oregon Administrative Rule (OAR) 860-001-0420, PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully requests that the Public Utility Commission of Oregon (Commission) grant a waiver of Integrated Resource Plan (IRP) Guideline 2(c). Guideline 2(c) provides that “[t]he utility must provide a draft IRP for public review and comment prior to filing a final plan with the Commission.”¹ PacifiCorp requests that the Commission grant this waiver because of the new and developing requirements in House Bill (HB) 2021 and Commission guidance in docket UM 2225. Due to these new and developing regulatory requirements, it is unlikely the Company can provide a complete draft of the 2023 IRP prior to filing the final plan. However, the Company believes that the intent of Guideline 2(c), to receive meaningful public feedback prior to the filing of an IRP, has already been met through the robust public input process the Company employs during the development of the IRP and Clean Energy Plan (CEP).

WAIVER REQUEST

PacifiCorp has been diligently working on the development of the 2023 IRP through a robust, transparent, and thorough public input process. The public input process is a critical

¹ *In the Matter of Public Utility Commission of Oregon Investigation Into Integrated Resource Planning*, UM 1056, Order 07-003 at 8 (Jan. 7, 2007).

component in the development of the IRP. PacifiCorp holds public meetings with stakeholder and interested participants to address areas of development of the upcoming IRP. The public input process for the 2023 IRP began in February 2022 with a series of public input meetings which addressed a range of topics describing PacifiCorp’s modeling methodology, inputs, and assumptions for the 2023 IRP. Agenda items covered topics including, but not limited to, resource cost-and-performance assumptions, model function and overview, load forecast, price-policy assumptions, market price assumptions, and transmission options considered as part of the 2023 IRP. To date, PacifiCorp has held eight public-input meetings and has two more public input meetings scheduled prior to the filing of the 2023 IRP. All public-input meeting materials, available studies conducted, and stakeholder feedback forms to date can be found at: <https://www.pacificorp.com/energy/integrated-resource-plan.html>.

PacifiCorp is committed to providing transparent and understandable content through the public input process to receive meaningful feedback from participants of diverse backgrounds and understandings of the IRP process. PacifiCorp believes that the public input process, which includes a series of public meetings, presentation materials, and opportunity for question and comment is an effective approach to solicit and receive meaningful public feedback prior to the filing of an IRP.

PacifiCorp has also been actively working to incorporate the requirements of HB 2021 into the 2023 IRP. HB 2021 requires electric companies to reduce greenhouse emissions associated with electricity sold to Oregon consumers to 100 percent below baseline emissions

levels by 2040.² Electric companies are also required to develop a CEP, which can be incorporated into an IRP filed with the Commission.³

PacifiCorp continues to work towards developing its 2023 CEP as an important component of its 2023 IRP. The Commission and stakeholders have devoted significant time and resources to provide electric companies timely guidance in the development of their CEP in docket UM 2225. While significant work has been done in docket UM 2225, rules have yet to be established governing the CEP and the docket is open and ongoing.⁴ For instance, PacifiCorp's analysis will be directly impacted by CEP expectations adopted by the Commission in recent Orders 22-390 and 22-446, issued October 25, 2022,⁵ and November 14, 2022,⁶ respectively.

Considering the compressed schedule to conduct new analysis and the public outreach necessary for the development of the CEP, PacifiCorp anticipates that 2023 CEP materials will not be sufficiently complete by January 2023 to circulate a draft for public comment. Given that the 2023 CEP will be an important component of the 2023 IRP, any draft circulated of the 2023 IRP would likely be incomplete and potentially misleading. Granting this waiver will remove this regulatory requirement and allow the Company to dedicate its resources to the preparation of the final 2023 IRP and 2023 CEP, which it will file with the Commission in March 2023.

² HB 2021, Section 3(1).

³ HB 2021, Section 4. Throughout the development of its first CEP (2023 CEP), PacifiCorp has sought and incorporated feedback from the public stakeholder, which has helped develop the Company's specific action actions, interim and specific targets, and other aspects of the 2023 CEP.

⁴ Staff has proposed it request the Commission open the formal rulemaking process at the December 13, 2022, Public Meeting.

⁵ *In the Matter of Public Utility Commission of Oregon Near-term Guidance on Analytical Improvements in the First Clean Energy Plans and Associated Integrated Resource Plans*, UM 2225, Order 22-446 (Oct. 25, 2022) ("By approving Staffs initial expectations for the development of the roadmap of actions and goals and Community Lens analysis, and by directing PacifiCorp, dba Pacific Power, and Portland General Electric Company to consider this guidance in developing each utility's first Clean Energy Plan (CEP) filings, we intend to bring clarity regarding how the utilities should approach the plan.").

⁶ *Id.*, UM 2225, Order 22-446 (Nov. 14, 2022) ("We direct PacifiCorp, dba Pacific Power, and Portland General Electric Company to consider this analytical guidance in developing each utility's first Clean Energy Plan filings and associated Integrated Resource Plan.").

CONCLUSION

Based on the foregoing, PacifiCorp respectfully requests that the Commission issue an Order waiving IRP Guideline 2(c) that requires “[t]he utility must provide a draft IRP for public review and comment prior to filing a final plan with the Commission” in this case.

Respectfully submitted this 13th day of December 2022, on behalf of PacifiCorp.



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