

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 85

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2025 Integrated Resource Plan and Clean
Energy Plan.

ORDER

**DISPOSITION: STAFF'S RECOMMENDATION ADOPTED IN PART, MODIFIED
IN PART**

This order memorializes our decision, made and effective at our February 19, 2026 Special Public Meeting, to adopt Staff's recommendations in this matter as modified. The Staff Report with the recommendation is attached as Appendix A. Our modifications and further discussion are summarized below.

1. We decline to acknowledge PacifiCorp's 2025 Integrated Resource Plan (IRP) long-term resource strategy and 2025 Clean Energy Plan (CEP) (Recommendation 1, Recommendation 9).

Our decision is based in large part on our significant concerns with the modeling provided by the company. We note the significant number of disputed modeling constraints, the omission of B2H, and a lack of clarity about resource adequacy needs in this IRP and CEP. Additionally, with so many constraints embedded in the modeling and the ongoing disputes about cost allocation, we expect it would be extraordinarily difficult to use the 2025 CEP and underlying modeling to demonstrate PacifiCorp's projected revenue requirement in the context of an HB 2021 cost cap filing in the future.

2. We acknowledge the IRP Action Items 1a, 1b, 1d, 1e, 1g, 1h, 1i, 1j, 2a, 4a, 5a, 6a, 6b and CEP Action Items 1a, 2a, 2c, 3a, 3b, 4a, 5a, 5b, 6a, 6b, 6c, and 7a.

We depart from Staff's recommendation and do not acknowledge Action Item 1c, the Naughton Gas Conversion, because it is essentially complete at this time.

In response to CUB's recommendation to not acknowledge the Dave Johnston conversions, we recognize that gas conversions will likely increase the flexibility and fuel resilience of the western grid overall and reduce costs and emissions for those jurisdictions that do not operate under coal use limitations. We, however, emphasize that, as in the 2023 IRP discussion of gas conversions, our acknowledgment is not a decision regarding future cost allocation decisions. We anticipate a robust discussion about the prudence and cost allocation of those conversions for Oregon, given the carbon budget HB 2021 establishes for Oregon customers.

3. We acknowledge the following IRP and CEP action items with conditions:
 - a. Acknowledge Action Items IRP 2b and CEP 2b under the conditions that PacifiCorp, as part of its 2025 IRP Update or a separate filing before July 2026,
 - i. Present a resource acquisition plan that addresses system reliability as well as state-specific needs and includes annual targets and important milestones (Recommendation 2), and
 - ii. For HB 2021 compliance, provide a structured execution strategy with time-bound deliverables regarding procurement, allocation of existing resources, clean market purchase, and gas dispatch (Recommendation 10).

We are acknowledging these action items, to issue RFPs to procure resources aligned with the 2025 IRP Preferred Portfolio that can achieve commercial operations by the end of December 2029, because it is clear that procurement needs to happen. However, the framing of these actions items assumes cost allocation that will be addressed in a future proceeding. We note, there is a difference between situs resources—physically located in PACW—and a situs cost allocation. Inclusion of a new deliverability constraint in this IRP makes PacifiCorp's meaning of the term situs unclear in these action items.

We also emphasize that the modeling to date is insufficient to support a prudence determination for any specific resource. PacifiCorp should be on notice that the scale, location, and specific value proposition of any procurement will need a record beyond the modeling contained in this IRP to demonstrate prudence. We have taken these issues up in the RFP and will continue to address them in any future cost recovery proceedings.

- b. We acknowledge IRP Action Items 3a and 3b, under the conditions that PacifiCorp,
 - i. File quarterly progress reports in Docket No. LC 85 on B2H that include a description of the proactive steps the company has taken and is planning to take to acquire BPA redirect rights from Longhorn to PACW, updates on any BPA studies, and all other information impacting the forecasted or actual availability of B2H (Recommendation 4),
 - ii. File a report in docket LC 85 that explains the company's decision-making before taking steps to commit B2H westbound transmission capacity to an individual customer (Recommendation 5), and
 - iii. As part of its 2027 IRP and unless BPA redirect rights have already been acquired, provide analysis demonstrating the relative costs and risks of transmission investments with and without B2H redirects as well as analysis estimating the value of BPA redirect rights (Recommendation 6).

We agree with staff that quarterly reporting is appropriate given rapidly changing circumstances, such as the Bonneville Power Administration's efforts to address use of their transmission system. We also recognize the IRP analysis of transmission needs can be complemented with regional processes such as the Western Energy Transmission Expansion Coalition, which demonstrates multiple customer benefits from transmission projects and the emerging value of the Energy Day-Ahead Market (EDAM) to transparently demonstrate where congestion might be relieved.

4. We decline to acknowledge IRP Action Item 1f (Recommendation 15).
5. We direct the company to include the following analytical approaches in the next IRP/CEP and/or IRP/CEP Update:
 - a. In its next IRP, PacifiCorp should provide a plan regarding the future of Jim Bridger Units 3 and 4 that is consistent with that of Idaho Power Company and including a study of gas conversion at Jim Bridger 3 and 4 (Recommendation 3). Additionally, we direct the company include a scenario that allows the preferred portfolio, including resources sufficient for Oregon policies (HB 2021 and SB 1547), where the coal fleet is allowed to dispatch

economically based on the marginal cost of the fuel rather than zero cost for fuel delivered under the minimum take contract.

We make this alteration to Staff's recommendation to enable us to understand how the coal fleet's lack of flexibility is impacting the resources Oregon customers are investing in, driving curtailment, or otherwise eroding the value of those investments.

- b. In its next IRP, PacifiCorp's modeling and analysis should include an optimized system-wide portfolio that meets the company's reliability needs. We expect that PacifiCorp's modeling and analysis should utilize variants or sensitivities (*i.e.*, counterfactuals) and explicit analysis of portfolio differences to clearly demonstrate how the needs assessment and resulting resource actions integrate incremental state-specific needs and investments with an optimized system-wide portfolio while meeting regional reliability standards in a way that minimizes costs and avoids unnecessary overbuilding. The approach should be demonstrated thoroughly and early enough to build stakeholder understanding and integrate their input. The impacts of constraints driven primarily by PacifiCorp's preferences for cost allocation should be isolated and justified through the use of variants and sensitivities. (Recommendation 7).

Our changes to Staff's recommendation 7 reflect our concerns with the low-trust environment in which we are operating with PacifiCorp. That environment fundamentally disrupts the function and purpose of the IRP and leaves us concerned that whatever requirements we adopt here will have limited success without also addressing that lack of trust. A shared understanding of the company's plan and how they plan to adapt to changing circumstances is a core element of the IRP process.

- c. In its 2025 IRP Update, PacifiCorp should report on large-load interconnection requests received over the last five years and their current status (*e.g.*, in contract negotiations, energized etc.). In its next IRP, PacifiCorp should include a realistic level of large load growth in its reference case load forecast, and evaluate a meaningful range of high and low growth scenarios. (Recommendation 8).

We are concerned that the modeling will not realistically and transparently show the geographic impacts of large loads without action by PacifiCorp to specifically reflect that. At the Special Public Meeting, we discussed our intent to amend this recommendation to require that this modeling include loads both realistically and transparently geographically located. However, that element was inadvertently omitted

from our final motion. As discussed at the meeting, this information is necessary to understand impacts on the generation portfolio in light of divergent state policies.

We anticipate that disputes about what is a realistic forecast and the desire to isolate the costs of these loads will continue to make this modeling challenging. PacifiCorp may offer a model variant that removes or isolates these loads so that stakeholders can clearly see how other load growth or policies also drive investment needs across the system.

Finally, we caution that concerns about confidentiality should not be used to avoid providing needed information. We are interested in a high degree of transparency, and it is important to balance confidentiality concerns against the need to fully understand impacts to the system and other customers.

- d. In its next IRP/CEP, PacifiCorp's portfolio analysis should test various technical implementations of HB 2021 compliance (*e.g.*, cost drivers or emission constraints), compare their performance quantitatively, and show that the company has chosen the strategy that best balances cost, risk, and pace of greenhouse gas (GHG) reductions (Recommendation 11).

In adopting this recommendation, we recognize it will be important for all the utilities and stakeholders to continue working on how unspecified market transactions are addressed so the value of EDAM—and particularly the high volume of clean energy being delivered from solar resources from California—are not eroded for Oregon customers.

- e. In the next CEP, PacifiCorp should demonstrate how community benefits and inputs received through engagement influenced the company's resource strategy, actions, and procurement approaches (Recommendation 12).
6. We decline to adopt Staff's motion part 6, and instead direct Staff to bring a recommendation on whether the company has demonstrated continual progress towards meeting HB 2021 emissions goals to a future public meeting to allow consideration of the information directed in part 3a (Recommendations 2 and 10), to be filed in either the company's IRP Update or a separate filing before July 2026. We direct that this filing also includes a discussion:

- of what was procured in phase 1 of the 2025 RFP,
- of the impact of EDAM on the use of unspecified market transactions and how to maximize the value of EDAM while maintaining HB 2021 compliance, and
- that provides an update on PacifiCorp’s investigation into the availability of clean market products to allow all parties to gain a better understanding of the options and limitations of products available in the market to meet both reliability and our clean energy goals.

Made, entered, and effective Feb 24 2026.



Letha Tawney
Chair



Les Perkins
Commissioner



Karin Power
Commissioner



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DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should acknowledge the PacifiCorp 2025 IRP long-term resource strategy or acknowledge Action Items in the IRP.

Whether the Commission should acknowledge the Company's CEP or specific portions of the CEP.

Whether the Commission should give PacifiCorp directions for its next IRP and CEP.

Whether the Commission should determine that the Company has demonstrated continual progress towards meeting HB 2021 emission goals.

Applicable Rule or Law

The Commission adopted least cost planning as the preferred approach to utility resource planning in 1989.¹ In 2007, the Commission updated its existing least cost planning principles and established a comprehensive set of "IRP Guidelines" to govern the IRP process. The IRP Guidelines, found in Order Nos. 07-002 (corrected by 07-047) and 08-339, clarify the procedural steps and substantive analysis required of Oregon's regulated utilities before the Commission considers acknowledgment of a utility's resource plan.² These orders are incorporated in OAR 860-027-0400(2), which requires any IRP to satisfy their requirements.

The IRP Guidelines and Commission rules require a utility to file an IRP with a planning horizon of at least 20 years within two years of its previous IRP acknowledgment order, or as otherwise directed by the Commission.³ Further, the IRP must also include an "Action Plan" with resource activities that the utility intends to take over the next two to four years.⁴ The utility's IRP should satisfy the IRP Guidelines and Commission rules for its determination of future long-term resource needs, its analysis of the expected costs

¹ Docket No. UM 180, Order No. 89-507, April 20, 1989.

² Docket No. UM 1056, [Order No. 07-002](#), January 8, 2007; [Order No. 07-047 \(correction\)](#), February 9, 2027. Additional refinements to the process have been adopted: See Docket No. UM 1302, [Order No. 08-339](#), June 30, 2008 (IRP Guideline 8 later refined to specify how utilities should treat carbon dioxide (CO₂) risk in their IRP analysis); Docket No. UM 1461, [Order No. 12-013](#), January 19, 2012 (guideline added directing utilities to evaluate their need and supply of flexible capacity in IRP filings).

³ Order No. 07-047, Appendix A at 1-3, Guidelines 1(c) and 3(a); OAR 860-027-0400.

⁴ Order No. 07-047, Appendix A at 5, Guideline 4(n).

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and associated risks of the alternatives reviewed to meet its future resource needs, and its near-term Action Plan to achieve the IRP goal of selecting the “portfolio of resources with the best combination of expected costs and associated risks and uncertainties for the utility and its customers.”⁵ This is often referred to as the “least cost/least risk portfolio.”⁶

An acknowledgment decision indicates whether the Commission finds that “the utility’s preferred portfolio and action plan is reasonable at the time of acknowledgment.”⁷ The Commission may decline to acknowledge a utility’s long-term plan, if it lacks “sufficient confidence that the IRP produces a plan and preferred portfolio representing the best combination of cost and risk for utility customers.”⁸ The Commission may “also decline to acknowledge specific action items if [the Commission] question[s] whether the utility’s proposed resource decision presents the least cost and risk option for its customers.”⁹ Additionally, the Commission may provide direction on additional analysis or actions for the next IRP or IRP Update.¹⁰

In Northwest Natural’s 2023 IRP, the Commission provided an overview of the IRP process:

Overall, an IRP should examine all the available options and focus on optimization to protect customers. We emphasize that an IRP is not a compliance filing, nor a forum where analysis should be constrained by legal positioning. Rather, it is an analytical exercise grounded by the adaptable principles set forth in our IRP guidelines. It is intended to be an exploratory process in which the costs, risks, and benefits of all viable resource options are transparently evaluated, placing favored corporate strategies on an even playing field with those less favored. The results of such an IRP may raise new questions about the business and the regulatory model, but that transparent evaluation is necessary for the PUC and the stakeholder community to engage with urgency and creative thinking about implications and corresponding regulatory changes to ensure that a financially healthy utility is capable of providing safe and reliable gas service.¹¹

⁵ OAR 860-027-0400(2)(a); Order No. 07-047, Appendix A at 1, Guideline 1(a).

⁶ Docket No. LC 79, [Order No. 23-281](#), August 2, 2023, p. 1.

⁷ Docket No. UM 1056, [Order No. 07-002](#), January 8, 2007, p. 24ff.

⁸ Docket No. LC 79, [Order No. 23-281](#), August 2, 2023, p. 7.

⁹ Docket No. LC 58, [Order No. 14-253](#), July 8, 2014, p. 1.

¹⁰ OAR 860-027-0400(7) and (10).

¹¹ Docket No. LC 79, Order No. 23-281, Aug. 2, 2023, p. 7. Staff notes the citation references gas service but believes the sentiment applies to both gas and electric utilities.

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In 2021, the legislature passed Oregon House Bill (HB) 2021, codified as ORS 469A.400 to 469A.475, which requires the state's large investor-owned electric utilities (IOUs) and electricity service suppliers (ESSs) to decarbonize their retail electricity sales with consideration for direct benefits to local communities.

ORS 469A.415 requires large electric IOUs to, "develop a clean energy plan for meeting the clean energy targets set forth in ORS 469A.410 concurrent with the development of each integrated resource plan," and file the plan with the Commission and Oregon Department of Environmental Quality (DEQ).

ORS 469A.420(2) provides that the Commission shall acknowledge the CEP, "if the commission finds the plan to be in the public interest and consistent with the clean energy targets set forth in ORS 469A.410." In determining whether the utility's CEP "is in the public interest" the Commission considers the following:

- a) Any reduction of greenhouse gas emissions that is expected through the plan, and any related environmental or health benefits,
- b) The economic and technical feasibility of the plan,
- c) The effect of the plan on the reliability and resiliency of the electric system,
- d) Availability of federal incentives,
- e) Costs and risks to the customers, and
- f) Any other relevant factors as determined by the commission.¹²

In addition, ORS 469A.415(6) requires the Commission to ensure that the utilities demonstrate continual progress within the CEP planning period toward meeting the clean energy targets and are taking actions as soon as practicable to reduce emissions at reasonable cost to retail electricity consumers.

Additional requirements for the filing, review, and update of IRPs and CEPs are provided in OAR 860-027-0400.

Finally, PacifiCorp's previous IRP and CEP, LC 82, resulted in Order Nos. 24-073 and 24-297, which provided specific directions to the Company on analytic matters.

Analysis

Background

¹² ORS 469A.420(2).

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PacifiCorp published a draft of its 2025 IRP on December 31, 2024, and filed its 2025 IRP on March 31, 2025.¹³ Substantive changes were introduced between drafts, including a deliverability requirement for PACW, which intended to account for east-to-west transmission constraints, and a new methodology for integrating jurisdictional portfolios, which intended to demonstrate compliance with specific jurisdictional policies. Pursuant to a waiver granted by the Commission, the Company filed its CEP on June 30, 2025.¹⁴ Amazon Data Services (Amazon),¹⁵ Alliance of Western Energy Consumers (AWEC),¹⁶ Citizens' Utility Board (CUB),¹⁷ Northwest Energy Coalition (NVEC),¹⁸ Renewable Northwest (RNW),¹⁹ Staff,²⁰ the city of Portland together with Multnomah County,²¹ as well as a group consisting of Coalition of Communities of Color, Green Energy Institute, Mobilizing Climate Action Together, NVEC, Oregon Just Transition Alliance, Sierra Club, and Verde (Joint Stakeholders)²² filed two rounds of comments. PacifiCorp appeared at three public meetings, twice to present its IRP and CEP, and once for a Commission-led workshop.²³ The Company also provided two rounds of reply comments.²⁴

PacifiCorp's last IRP and CEP are important context for this proceeding. In Order No. 24-073, the Commission did not acknowledge the majority of PacifiCorp's IRP, including the long-term strategy, directing the Company to seek acknowledgment through its IRP update.²⁵ This decision reflected the fact that PacifiCorp's decisions regarding coal exits and clean energy procurement were not consistent with the 2023 Preferred Portfolio

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- ¹³ PacifiCorp, [2025 Draft IRP Vol. 1](#), December 31, 2024; PacifiCorp, [2025 IRP Vol. 1](#), March 31, 2025.
- ¹⁴ Docket No. LC 82, [Order No. 25-090](#), March 5, 2025; Docket No. LC 85, [Clean Energy Plan](#), June 30, 2025.
- ¹⁵ Docket No. LC 85, [Amazon's Opening Comments](#), July 29, 2025; [Amazon's Round 2 Comments](#), October 9, 2025.
- ¹⁶ Docket No. LC 85, [AWEC's Opening Comments](#), July 29, 2025; [AWEC's Round 2 Comments](#), October 9, 2025.
- ¹⁷ Docket No. LC 85, [CUB's Opening Comments](#), July 29, 2025; [CUB's Round 2 Comments](#), October 9, 2025.
- ¹⁸ Docket No. LC 85, [NVEC's Opening Comments](#), July 29, 2025.
- ¹⁹ Docket No. LC 85, [RNW Opening Comments](#), July 29, 2025; [RNW's Round 2 Comments](#), October 9, 2025.
- ²⁰ Docket No. LC 85, [Staff Opening Comments](#), July 29, 2025; [Staff's Round 2 Comments](#), October 9, 2025.
- ²¹ Docket No. LC 85, [City of Portland's Bureau of Planning & Sustainability and Multnomah County Office of Sustainability Comments](#), October 9, 2025.
- ²² Docket No. LC 85, [Sierra Club, MCAT, GEI, and NVEC's Opening Comments](#), July 29, 2025; [GEI, Sierra Club, OJTA, Verde, MCAT, NVEC, and CCC Round 2 Comments](#), October 9, 2025.
- ²³ Full schedule can be found [here](#).
- ²⁴ Docket No. LC 85, [PacifiCorp's Reply Comments](#), August 26, 2025; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025.
- ²⁵ Docket No. LC 82, [Order No. 24-073](#), March 19, 2024.

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and Action Plan. The Commission gave PacifiCorp explicit direction for its 2025 IRP:

Our goal in an IRP proceeding is to acknowledge that a utility's action plan and preferred portfolio represent the least cost, least risk strategy for meeting customer needs, based on the best data available at the time and using the best available tools to analyze and review that data. In this particular IRP proceeding, we are asked to review a plan and portfolio that PacifiCorp had already abandoned by suspending the 2022 All-Source RFP, and that was further impacted by the stay of the federal Ozone Transport Rule. We are left without a plan that reflects PacifiCorp's reality, and without any willingness by PacifiCorp to adjust its action plan to reflect that reality. Therefore, we have no basis on which to acknowledge the majority of PacifiCorp's IRP, nor can we acknowledge its CEP without the foundation of a viable IRP action plan. **We expect that, in 2025, we will be given a plan that follows Staff's recommendations and reflects both updated operating circumstances and an action plan that the company can stand behind.**²⁶

Similarly, the Commission rejected the CEP since it did not provide a clear plan for how the Company would achieve HB 2021 emission targets, directing PacifiCorp to revise and resubmit the CEP. However, despite drastic changes in strategy and emissions since 2024, the Company did not seek acknowledgment for its IRP Update and Oregon Planning Supplement.²⁷ In Order 24-297, the Commission found that PacifiCorp was not making continual progress in regard to HB 2021, opened a docket to consider requiring the Company to issue a Request for Proposals (RFP), directed the Company include an executable Action Plan in its next CEP, and instructed the Company to file a Small-Scale Resource (SSR) acquisition strategy.²⁸

IRP Overview

In its 2025 IRP, PacifiCorp takes a new modeling approach to deal with the complex policy environment across its six-state service territory. For each portfolio buildout, the Company starts with three different jurisdictional models (OR, WA, and one for Utah, Wyoming, Idaho and California – UWIC). The optimal resource selections in each, based on jurisdictional planning requirements, are then combined in an excel workbook. For cost allocation purposes, the model treats all new resources as addressing state policies, and situs-assigns them to UWIC, if they are located in the PacifiCorp East Balancing Area (PACE), and situs-assigns them to Oregon and Washington in a

²⁶ Docket No. LC 82, [Order No. 24-073](#), March 19, 2024, p. 1 emphasis added.

²⁷ Docket No. LC 82, [2023 IRP Update](#), April 1, 2024; [Oregon Planning Supplement](#), April 1, 2024.

²⁸ Docket No. LC 82, [Order No. 24-297](#), August 28, 2024.

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75 percent – 25 percent split, if they are located in the PacifiCorp West Balancing Area (PACW). As an additional constraint, all new resources serving PACW must be in PACW, reflecting a deliverability requirement. Additional changes from the 2023 IRP include the removal of the ability of the Boardman to Hemingway transmission line (B2H) to bring energy to PACW, explicit modeling of compliance with the Western Resource Adequacy Program (WRAP), and the automatization of reliability and granularity adjustments. These adjustments bridge the gap between the long-term (LT) model, which builds portfolios based on a few representative monthly hours, and the short-term (ST) model, that simulates the operation of PacifiCorp's system over 8760 hours a year. The Company iterates through these models with the ST model passing back information (the adjustments) to the LT model about the value of individual resources. PacifiCorp's CEP builds on the IRP model but shows slightly different resource selections.

The IRP 2025 presents a long-term strategy with the following characteristics and insights:

- PacifiCorp's resource strategy relies on continued operation of its majority-owned coal facilities and assumes these resources will remain economic and in line with federal environmental and emissions policies.
- The Company shows a capacity position that requires immediate procurement action. Based on a history of balancing PACW with large market purchases, and increasingly congested east to west transmission lines, PacifiCorp wants to pursue large resource additions in PACW.
- In terms of near-term procurement, the Company proposes jurisdiction specific procurements. The Company forgoes a system-wide RFP for reliability because it believes that due to Senate Bill (SB) 1574 and HB 2021, Oregon's reliability needs should be treated as policy-specific and situs-assigned. For PACE, the Company assumes that no near-term procurements are necessary, relying instead on market purchases. The Company's IRP Action Plan does not propose any details on a planned cadence or ranges for procurements. The CEP Preferred Portfolio appears to propose a just-in-time procurement strategy, adding 339 MW of non-emitting resources for Oregon by 2029, and an additional 3 GW in 2030.
- The Company is optimistic about the maturity of new technologies. By 2032, the Company plans to convert Jim Bridger Units 3 and 4 to carbon capture, add 511 MW of 100-hour batteries, and construct the Natrium nuclear reactor.
- In terms of transmission strategy, the Company assumes that redirect rights, which would connect PACW to the endpoint of B2H, are unlikely to materialize and the best way forward is finding other uses for the transmission line. Without B2H, PacifiCorp believes massive investments in PACW transmission are

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necessary, because its existing transmission system is already oversubscribed. The long-term plan invests \$4.1 billion in PACW and \$42 million in PACE.

- The value of energy efficiency is increasing over the planning period, leading to higher levels of adoption compared to the 2023 IRP. The Company proposes acquisition goals in line with Energy Trust's multi-year plan. After coming in consistently below targets, the Company plans to modify Oregon's Demand Response (DR) capacity from 27 MW today to only 55 MW in 2027, whereas the 2023 CEP had targeted 148 MW as soon as 2026. This reflects a decreased value of DR from the IRP analysis.
- The Company's CEP achieves compliance through a just-in-time procurement strategy, forgoing previous strategies of reallocating existing resources or pursuing clean market purchases.

Overall IRP and Strategy Assessment

Staff and stakeholders agree that the IRP's modeling flaws are too extensive to represent a least cost, least risk plan, as required by IRP Guideline 1c. While Staff appreciates the Company's engagement and willingness to answer questions, PacifiCorp has not adequately explained how its plan balances cost and risk. In particular, several modeling and analytical issues have been identified and remain unresolved in this proceeding that make it unlikely that the presented plan is optimal. This includes the jurisdictional methodology, treatment of B2H, deliverability requirements, the distinction between reliability and policy needs, portfolio selection, treatment of large loads, and unaddressed errors. As a result, the Commission, Staff, and stakeholders lack crucial information as to how the Company should treat existing thermal plants, acquire new generation, and where to make transmission investments. Without PacifiCorp resolving or being able to justify its long-term plan better, Staff is concerned that the Company's approach may burden Oregon ratepayers with unnecessary costs or fail to give the Commission sufficient information to identify potential reliability issues.

Over two rounds of comments, Staff requested additional analysis to learn about distortions caused by the modeling challenges unanimously called out by stakeholders in this proceeding. For example, Staff asked for a system-wide portfolio run that could distinguish reliability needs from policy needs and would indicate the degree to which the jurisdictional methodology may cause overbuilding.²⁹ The Company responded with openness to do additional analysis in future IRPs but rejected the necessity for further analysis or changes in this IRP.³⁰ While this is partially understandable – PacifiCorp filed the IRP in six jurisdictions that may or may not agree with changes suggested by

²⁹ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, p. 19f.

³⁰ Docket No. LC 85, [PacifiCorp's Reply Comments](#), August 26, 2025, p. 9.

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Oregon Staff – it leaves the Commission without an acknowledgeable IRP long-term strategy or analysis that can be relied upon in other proceedings. Despite the major modeling flaws, Staff has identified several near-term Action Items that can be expected to perform well regardless of future conditions and several items, such as continued non-emitting resource procurement, that may be reasonable if certain conditions are met to mitigate cost and risk.

Fundamentally, this IRP leaves Staff blind as to whether the Company is pursuing a least cost, least risk strategy. The IRP fails to:³¹

- Identify near term actions that perform well across portfolios and futures, including ranges and schedules for procurement. For example, the Commission should be able to understand the Company’s procurement cadence, how it will evaluate bids in RFPs, whether RFPs will be system- or Oregon-specific, and what realistic targets are.
- Surface the greatest risks to customers in the near-term Action Plan and identify mitigation strategies. For instance, the Commission needs to know how and when the Company will proceed with major thermal resource decisions, such as a carbon capture conversion of Jim Bridger and identification of contingency plans.
- Flag for the Commission key insights into major decision points, challenges, and dependencies that will affect the long-term strategy. For example, the Commission needs to know how the Company is evaluating different utilization options for B2H and when decisions will be locked in.
- Identify enabling strategies that the utility is pursuing in the near-term or evaluating in the long-term, which support the resource strategy, including changes to system operational practices. For example, the Commission needs to know whether the Company believes the resource additions of the Preferred Portfolio to be feasible, and how the Company plans to achieve them.
- Identify appropriate models for downstream processes, such as RFPs or Multi-State Protocol (MSP) allocation methodology negotiations. For example, the Commission needs the Company to be able to distinguish between full system reliability needs and HB 2021 needs.

The Company does not agree with the importance of addressing these questions in the IRP, writing “PacifiCorp is skeptical that more detailed and granular discussion of

³¹ These areas are highlighted by the proposed rules in Docket No. AR 669, [Staff Report for the September 16, 2025 Public Meeting](#), September 10, 2025.

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strategies may not serve IRPs or CEPs well, as parties currently lack consensus on fundamental modeling assumptions. Until those assumptions have broader buy-in, more granular strategies based on those modeling assumptions are likely premature. That said, PacifiCorp will commit to working with Staff on how it would prefer to see these analyses in future IRP/CEP planning cycles.”³²

Staff is disappointed that the Company has not engaged in identifying many of the core outcomes expected from a meaningful IRP review process. Outcomes such as identifying procurement ranges, decision points, and enabling strategies have been discussed at length and depending on the outcome in Docket No. AR 669, are soon to be requirements codified in administrative rules.³³

Recommendation 1: Decline to acknowledge PacifiCorp’s 2025 IRP long-term resource strategy.

In addition, Staff recommends the Commission give direction for the Company’s next IRP and take additional actions regarding new resources, existing resources, and the Company’s transmission strategy.

New Resources

PacifiCorp’s IRP does not create sufficient certainty or market signals surrounding its procurement plans. According to IRP Action Item 2b/CEP Action Item 2b, “PacifiCorp will initiate with individual jurisdictions the process to issue as appropriate by individual jurisdiction need, one or more independent Request for Proposals (RFP) to procure resources aligned with the 2025 IRP Preferred Portfolio that can achieve commercial operations by the end of December 2029.”³⁴

Staff understands and supports the need to issue RFPs and pursue additional new resource procurement actions in the Action Plan window. This is not a controversial proposal. However, fundamental modeling flaws and the lack of quantitative energy and capacity procurement targets in PacifiCorp’s Action Items hinder Staff’s ability to understand what exactly the Company’s procurement strategy is, and whether it is in the best interest of ratepayers. Furthermore, modeling flaws are likely to be passed down to RFP processes without Commission and Staff intervention. Each of these issues will be addressed in turn.

³² Docket No. LC 85; [PacifiCorp’s Round 2 Reply Comments](#), November 6, 2025, p. 40.

³³ Docket No. AR 669, [Rulemaking to Amend Integrated Resource Plan Guidelines and Competitive Bidding Rules](#).

³⁴ PacifiCorp, [2025 Draft IRP Vol. 1](#), December 31, 2024, p. 289.

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First, the IRP fails to estimate energy and capacity procurement needs for least cost, least risk system-wide reliability, i.e. the minimum amount necessary to keep the lights on. Staff disagrees with the Company's approach to situs-assign all new resource additions as policy-specific. In accordance with the current MSP, resources for system reliability needs should be shared among states according to their load, while policy-specific needs, such as resources for HB 2021 compliance, can be situs-assigned to specific jurisdictions. Furthermore, Staff disagrees with the Company's assertion that due to SB 1547, which requires coal to be removed from Oregon rates by 2030, there is a state-specific reliability need that is approximately accounted for by the Company's methodology.³⁵ The widening capacity deficit in the Company's load and resource balance exists independently of coal allocation – reassigning it from UWIC to Oregon in 2030, as the Company's reply comments suggest, defies logic.³⁶ Instead, how to fill the Company's overall capacity deficit, while respecting state policies, would be best addressed with a counterfactual methodology, as described in Recommendation 7. Without such analysis it is unclear what the most critical procurement needs are, and whether the Company is appropriately acting on them.

Second, while PacifiCorp is acting on items the Commission identified as necessary for continual progress, the IRP/CEP fails to propose annual procurement targets or milestones for Oregon that would allow Staff to determine whether the Company will be on track to fill its resource and compliance needs and whether the Company is adequately adjusting to changing conditions. This is complicated by the fact that Staff and Stakeholders do not believe that the Company's Preferred Portfolio selects the most efficient amount of resources necessary or appropriately explores alternative options. Neither IRP nor CEP explain if or how it is possible to acquire over 4 GW of non-emitting resources by 2030.

Third, modeling flaws will likely negatively impact the selection of RFP short lists and other bilateral procurement decisions. For instance, only relying on jurisdictional models would fail to identify resources that are beneficial and cost-effective for the system as a whole. Similarly, problems with overbuilding will be likely inherited by RFP models. Lastly, excluding B2H east to west transmission capacity could lead to the selection of more expensive resource options.

³⁵ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, p. 13.

³⁶ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, Figure C.

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The Company did not provide requested information that could have helped clarify these issues. Without it, the IRP does not send proper signals to developers, who would not know what resources to build or offer, when they need to be ready, or what locations to plan for. Supported by Order No. 25-343, Staff is actively addressing these issues in PacifiCorp's ongoing RFP in UM 2383.³⁷ B2H will be included in a second round of the RFP, and Staff is working with the Company on how to assess capacity needs systemwide. Staff will continue vetting modeling choices through RFP dockets until a new IRP model is available.

Overall, Staff believes the Company's procurement Action Items, reproduced below, do not give the Commission sufficient information about procurement needs and plans. Risks of over- or under-procurement can be mitigated by the Company presenting a resource acquisitions plan that addresses reliability and state-specific needs, as soon as possible.

Table 1: New Resource Actions

Item	Description	Staff Recommendation/Notes
New Resources		
2b	PacifiCorp will initiate with individual jurisdictions the process to issue as appropriate by individual jurisdiction need, one or more independent Request for Proposals (RFP) to procure resources aligned with the 2025 IRP Preferred Portfolio that can achieve commercial operations by the end of December 2029. Individual independent jurisdictional RFP filings will include timelines associated with the respective jurisdictions' process. Considering the differentiated resource needs by jurisdiction identified in the 2025 IRP, scope and targeted resource needs may vary by jurisdiction.	Conditional acknowledgment per Recommendations 2 and 10.
CEP 2b	On April 16, 2025 PacifiCorp filed the draft 2025 OR Situs RFP to procure Oregon situs resources that can achieve commercial operations by the end of December 2029. PacifiCorp expects a Commission decision regarding approval of the RFP by early October 2025. Following approval, PacifiCorp will issue the RFP to market. PacifiCorp will evaluate opportunities to accelerate procurement of resources identified in the Preferred Portfolio in 2030 when evaluating proposals from the 2025 OR Situs RFP.	Conditional acknowledgment per Recommendations 2 and 10.

³⁷ Docket No. UM 2383, [Order No. 25-343](#), August 29, 2025.

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Recommendation 2: Acknowledge Action Items IRP 2b and CEP 2b under the condition that PacifiCorp, as part of its 2025 IRP Update or a separate filing before June 2026, present a resource acquisition plan that addresses system reliability as well as state-specific needs and includes annual targets and important milestones.

Further details regarding HB 2021 compliance are addressed by Recommendation 10.

Existing Resources

PacifiCorp has not demonstrated that its Preferred Portfolio is least cost, least risk as compared to the HH or Hunter Retire portfolios, which have lower costs, lower emissions, and lower risks.³⁸ While neither alternative includes dramatically different resource additions in the short term, both include coal exits in 2030 and 2031, which would require planning for within the Action Plan window. While Staff does not object to IRP action Items 1a, 1b, and 1c, which address thermal retirements and gas conversions, the Action Plan does not include sufficient details regarding such plants as Hunter, Huntington, or Wyodak. The Action Plan must identify major decision points and contingencies to create transparency and avoid the risk of stranded assets. For instance, while the Company does not have to decide whether to retire Hunter today, the Commission does need to know whether the Company is deciding to take actions today that preempt the retirement option (e.g. by signing lengthy coal contracts).

Similarly, Staff does not object to Action Item 1d, which states that PacifiCorp will evaluate the feasibility of carbon capture at Jim Bridger Units 3 and 4. At the same time, the Action Plan does not identify how and when PacifiCorp will make decisions regarding this facility. This is concerning because the Company's Preferred Portfolio brings carbon capture online in 2030. Furthermore, PacifiCorp has not addressed how it is reconciling its approach with co-owner Idaho Power Company, which finds a gas conversion or a retirement to be preferable over carbon capture.³⁹

In justifying its Preferred Portfolio, the Company solely relied on Present Value Revenue Requirement (PVRR) with end effects. In comments, Staff explained that it did not believe that repeating the total cost of year 2045 five times was an appropriate consideration of cost distortions by a necessarily finite planning horizon, i.e. end effects.⁴⁰ The Company explained that its methodology accounts for solar and wind production credit expiration in that year.⁴¹ Staff is not convinced that the total year

³⁸ Docket No. LC 85, [Staff's Round 2 Comments](#), October 9, 2025, p. 21ff; [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 21ff.

³⁹ Docket No. LC 87, [2025 Integrated Resource Plan](#), June 27, 2025.

⁴⁰ Docket No. LC 85, [Staff's Round 2 Comments](#), October 9, 2025, p. 22.

⁴¹ Docket No. LC 85, [PacifiCorp's Reply Comments](#), August 26, 2025, p. 42.

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PVRR captures this appropriately, especially since the majority of the increase in that year is related to fixed costs such as battery and generator build, and fixed operating and maintenance costs.⁴² Furthermore, it would be inappropriate to only consider effects outside the model in relation to renewables but not in relation to other resources. Staff agrees with Joint Stakeholders that, “absent a better approach, the Commission should ignore the end effects proxy as presented in Figure 9.34 of the IRP.”⁴³ In the future, Staff expects the Company to develop a more sophisticated end effect methodology.

Lastly, it is unclear how the Company has qualitatively considered the information learned from various scenarios and variants, such as futures with high/low gas prices or carbon prices. The omission of environmental regulatory risk is especially glaring since the Commission did not acknowledge PacifiCorp’s 2023 IRP in part because a stay of the federal ozone transport rule misaligned the Company’s Preferred Portfolio with what the Company itself considered a least cost strategy.⁴⁴ Nonetheless, in Action Items 1e, 1g, and 1i, PacifiCorp appears to simply monitor ozone transport rules, regional haze rules, and federal carbon emission rules, instead of identifying clear contingencies and decision points.

Overall, Staff believes the Action Items reproduced below can be acknowledged. At the same time, the Company should better justify portfolio selection and provide more details regarding their near-term plans for existing resources, as suggested in Staff Expectations 1 through 3, and Recommendation 3.

Table 2: Existing Resource Actions

Item	Description	Staff Recommendation/Notes
Coal & Gas		
1a	PacifiCorp will continue to work with co-owners to develop the most cost-effective path toward an exit from the Colstrip project in Montana by 2030.	Acknowledgment. No Change from 2023 IRP.
1b	PacifiCorp will continue to work closely with co-owners to seek the most cost-effective path forward toward the 2025 IRP Preferred Portfolio target exit date of December 31, 2025.	Acknowledgment. The Company should retire Craig Unit 2 in 2028, as included in the Preferred Portfolio and stated in response to OPUC IR 4. No change from 2023 IRP.

⁴² See 2025 IRP Workpaper, (P)_ST Cost Summary - 25I.LP.ST.r21.Base.EP.2409HH.Integrated.175780 (LT. 175780 - 178133) v107.7.

⁴³ Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 40. Better approaches include, 1) assigning terminal values to resources, 2) running the model for longer time periods than results are considered, 3) making manual adjustments based on an ex-ante agreed upon method, or 4) testing the effects of different assumptions.

⁴⁴ Docket No. LC 82, [Order No. 24-073](#), March 19, 2024.

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1c	<p>PacifiCorp will continue the process of converting Naughton Units 1 and 2 to natural gas as initiated in Q2 2023, including obtaining all required regulatory notices and filings. Natural gas operations are anticipated to commence spring of 2026.</p> <p>PacifiCorp will initiate the closure of the Naughton South Ash Pond no later than the end of December 2025 when coal operations cease, and will complete closure by October 17, 2028, as required under its pond closure extension submission.</p>	<p>Acknowledgment. No change from 2023 IRP.</p>
1d	<p>PacifiCorp will continue to evaluate the economic and technical feasibility of carbon capture technology on Jim Bridger Units 3 and 4 to comply with Wyoming's low carbon portfolio standard. The Company is pursuing a front-end engineering design study as part of compliance with Wyoming's low carbon portfolio standard requirements as a site-specific analysis is needed to better understand the feasibility of the project.</p>	<p>Acknowledgment. Risks and decision points addressed by Staff Expectation 3. Coordination with Idaho Power Company addressed by Recommendation 3.</p>
1e	<p>Following the resolution of first planning period regional haze compliance disputes, and the EPA's determination of the states' second planning period regional haze state implementation plans, PacifiCorp will evaluate and model any emission control retrofits, emission limitations, or utilization reductions that are required for coal units.</p> <p>PacifiCorp will continue to engage with the EPA, state agencies, and stakeholders to achieve second planning period regional haze compliance outcomes that improve Class I visibility, provide environmental benefits, and are cost effective.</p>	<p>Acknowledgment. Better accounting of risks addressed by Staff Expectations 2 and 3.</p>
1g	<p>EPA finalized its approval of Wyoming's cross-state ozone state plan on December 19, 2023. This approval means PacifiCorp facilities in Wyoming are not subject to the federal ozone plan requirements.</p> <p>The Tenth Circuit granted a motion to stay EPA's disapproval of Utah's state ozone plan. Utah is not subject to federal ozone requirements while the stay is in place. The Utah ozone case was transferred to the D.C. Circuit in February of 2024, for adjudication of the merits, leaving the stay in place. PacifiCorp will continue to monitor developments in the Utah ozone case and adjust its plans accordingly in response to developments.</p>	<p>Acknowledgment. Better accounting of risks addressed by Staff Expectations 2 and 3.</p>
1i	<p>EPA finalized its regulation for existing coal-fueled steam units under Clean Air Act Section 111(d) in April 2024, though the rule has been challenged in the D.C. Circuit.</p> <p>PacifiCorp will continue to update and evaluate alternatives for affected resources while the legal process continues.</p>	<p>Acknowledgment. Better accounting of risks addressed by Staff Expectations 2 and 3.</p>
1j	<p>PacifiCorp will initiate the process of converting Dave Johnston Units 1 and 2 to natural gas, including obtaining</p>	<p>Acknowledgment. The 2023 IRP proposed to retire the units.</p>

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	all required regulatory notices and filings. Natural gas operations are anticipated to commence spring of 2029.	
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Staff Expectation 1: For future IRPs, the Company should develop a more nuanced assessment of end effects and explain how end effect considerations impact the Company's Preferred Portfolio and Action Plan.

Staff Expectation 2: In future IRPs, PacifiCorp should explicitly explain how the presented information supports the selection of its Preferred Portfolio, at a minimum touching on different measures of deterministic and stochastic costs, as well as regulatory, price, and technology risks.

Staff Expectation 3: In future IRPs, PacifiCorp should identify near term resource modifications and procurement actions that perform well across portfolios, including ranges and schedules, flag major decision points, and identify enabling and risk mitigation strategies.

Recommendation 3: In its next IRP, PacifiCorp should provide a plan regarding the future of Jim Bridger Units 3 and 4 that is consistent with that of Idaho Power Company.

Transmission Strategy

PacifiCorp's transmission strategy is heavily informed by the exclusion of B2H's ability to serve PACW associated with yet unresolved negotiations regarding redirect availability and a deliverability constraint that requires resources serving PACW to be located in PACW. Staff finds this problematic because B2H availability is not yet finalized and PAC has not adequately justified its deliverability constraints. These factors distort the Company's transmission needs in the west and risk investments in long-term assets to address what may be a temporary issue. Staff generally agrees with PacifiCorp that more transmission investment, especially in PACW, is necessary. Unfortunately, the specific investments identified in the IRP are not only dependent on potentially temporary B2H assumptions, but also strongly influenced by the Company's deliverability constraints. Instead, the Company should proactively pursue B2H while developing clear contingency plans and identifying concrete decision points.

B2H

Staff and stakeholders criticized the Company's decision to remove B2H from its portfolio modeling, and to constrain east-west energy delivery to PACW based on temporary delays in acquiring redirect rights.⁴⁵ The Company's strategy regarding B2H is not analyzed or described in the IRP. This is problematic because the Commission

⁴⁵ Docket No. LC 85, [Staff's Round 2 Comments](#), October 9, 2025, p. 7f.

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now lacks information regarding the dependence of the Company's transmission and procurement efforts on the status of B2H as well as how the Company plans to resolve different options regarding the future of B2H.

In response to Staff Information Request 52, the Company explained that it was actively negotiating a service agreement with a large load customer that includes utilization of B2H's east to west transfer capability. The Company has not disclosed details about the large load customers but has indicated near the Longhorn substation as the location.⁴⁶

Staff and stakeholders in this docket believe that PacifiCorp has not exhausted all proactive steps toward acquiring redirect rights and hence committing B2H capacity to an individual large load customer is premature; furthermore, these actions are not justified by analysis in this IRP.⁴⁷ The Company disagrees, stating that "given current realities, it is prudent for PacifiCorp to plan that B2H will not be able to serve existing load in Oregon" but commits to including a B2H sensitivity in its IRP Update.⁴⁸

Overall, Staff recommends PacifiCorp take proactive steps to pursue the value envisioned by B2H to Oregon customers or provide analysis in its IRP to justify a different approach. Acknowledgment of transmission IRP Action Items 3a and 3b, as reproduced below, should be conditional on this. In addition, the Company should make a filing before committing B2H westbound transmission capacity to individual customers, including analysis that shows this to be in the interest of ratepayers. It is important that major strategic choices, such as the utilization of B2H, are analyzed in the Company's IRPs, thus Staff expects that future IRP will reflect said analysis.

Table 3: Transmission Actions

Item	Description	Staff Recommendation/Notes
Transmission		
3a	Initiate Local Reinforcement Projects as identified with the addition of new resources per the Preferred Portfolio, and follow-on requests for proposal successful bids.	Conditional acknowledgment per Recommendations 4, 5, and 6. Modeling improvements addressed by Staff Expectation 4.
3b	Continue permitting support for Gateway West segments D.3 and E. Initiate preliminary permitting and	Conditional acknowledgment per Recommendations 4, 5,

⁴⁶ PacifiCorp Response to OPUC Information Request 53. PacifiCorp Responses to STOP B2H Information Request 1 through 5.

⁴⁷ Most recently, at the IRP Input Meeting on October 1, 2025, Rick Link clarified that the question is not whether B2H can connect to PACW, but when and at which cost. In response to OPUC IR 52, PacifiCorp states it is planning to commit B2H capacity to serve new large loads in the Longhorn vicinity. In its Reply Comments, the Company states that new large load customers are supposed to pay their own way and are hence excluded from the IRP.

⁴⁸ Docket No. LC 85, [PacifiCorp's Reply Comments](#), August 26, 2025, p. 19.

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<p>development activities for future transmission investments not currently included in the Preferred Portfolio. These future transmission projects can include development of additional Energy Gateway segments and exploration of new routes that have connections to other regions (i.e., connecting southern Oregon to the east with connections to the desert southwest). These activities will enable PacifiCorp to prepare for potential growth in new large loads seeking new service over the next decade.</p>	<p>and 6. Modeling improvements addressed by Staff Expectation 4.</p>
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Recommendation 4 to 6: Acknowledge IRP Action Items 3a and 3b, under the conditions that PacifiCorp

- i) **File quarterly progress reports in Docket No. LC 85 on B2H that include a description of the proactive steps the Company has taken and is planning to take to acquire BPA redirect rights from Longhorn to PACW, updates on any BPA studies, and all other information impacting the forecasted or actual availability of B2H (Recommendation 4),**
- ii) **File a report in Docket No. LC 85 that explains the Company's decision-making before taking steps to commit B2H westbound transmission capacity to an individual customer (Recommendation 5), and**
- iii) **As part of its 2027 IRP and unless BPA redirect rights have already been acquired, provide analysis demonstrating the relative costs and risks of transmission investments with and without B2H redirects as well as analysis estimating the value of BPA redirect rights (Recommendation 6).**

Deliverability Constraint

In the 2025 IRP, the Company introduced a new constraint requiring any new proxy resource serving load in PACW to be located in PACW. This has been discussed as deliverability requirement in the previous section on resource additions. Staff, RNW, and NWECA argued that the deliverability requirement was not justified and led to a distortion of resource needs and suboptimal resource locations in this IRP.⁴⁹ In Reply Comments, the Company showed openness to removing the deliverability requirement in future IRPs but argued that its use in this IRP was well-justified.⁵⁰ Staff finds that the Company has not justified why this constraint is necessary given the nature of the overall modeling approach. Within Plexos, the Company models multiple load bubbles that are connected by transmission lines. In simplified terms, the optimization model picks the

⁴⁹ Docket No. LC 85, [Staff Opening Comments](#), July 29, 2025, p. 17f.

⁵⁰ Docket No. LC 85, [PacifiCorp's Reply Comments](#), August 26, 2025, p. 24.

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least cost resource locations, taking into account not only load and generation shapes, but also transmission availability. This means a deliverability constraint would only be necessary if there was either an important factor not contained within the model (e.g. additional resource adequacy considerations) or to improve computational efficiency. The Company has not provided either one. Staff provided an example of how to establish a deliverability constraint through transmission-constraint resource adequacy analysis in its Round 2 Reply Comments. Here, Staff found that 37.5 percent of new resources could be located in PACE without impacting resource adequacy.⁵¹

Further, the difference between the draft and final IRP illustrate that PacifiCorp’s transmission strategy is highly contingent on the deliverability requirement, which was only added in the final analysis. In the Draft IRP, 51 percent of transmission investment happens in PACE, which drops to 1 percent in the final IRP, with no substantive change to the overall investment amount.⁵² While Staff supports transmission Action Items 3a (initiate local reinforcement projects as identified with the addition of new resources) and 3b (preliminary development activities for future transmission options), PacifiCorp’s transmission planning assumptions should be better supported and grounded in data about system operations and transfer capability so that they provide the best sense for east and west transmission capacity needs (Staff Expectation 4).

Table 4: Transmission Draft vs. Final IRP

Draft 2025 IRP East-side Transmission Selection	Final 2025 IRP East-side Transmission Selection
<p data-bbox="203 1255 771 1325">Multiple Upgrades UT South to Wasatch Front</p> <ul style="list-style-type: none"> <li data-bbox="251 1339 808 1451">• 2026: Rebuild existing Cameron-Sigurd 138kV (TTC = 500, Interconnect = 250, Cost = \$30m) <li data-bbox="251 1465 808 1577">• 2036: Huntington-Clover 345 kV (TTC = 1600, Interconnect = 800, Cost = \$264m) <li data-bbox="251 1591 808 1703">• 2036: Spanish Fork – Mercer 345 kV (TTC = 600, Interconnection = 300, Cost = \$153m) 	<p data-bbox="836 1255 1404 1325">Multiple Upgrades UT South to Wasatch Front</p> <ul style="list-style-type: none"> <li data-bbox="885 1339 1442 1451">• 2026: 138kV reinforcement #1 (TTC = 500, Interconnect = 250, Cost = \$30m) <li data-bbox="885 1465 1442 1577">• 2028: 138kV reinforcement #2 (TTC = 400, Interconnect = 200, Cost = \$12m) <p data-bbox="933 1606 1393 1675">Total Cost for East Side Tx build = \$30+\$12 = \$42m</p>

⁵¹ Docket No. LC 85, [Staff’s Round 2 Comments](#), October 9, 2025, p. 10.

⁵² PacifiCorp, [2025 Draft IRP Vol. 1](#), December 31, 2024, Table 9.8 ; PacifiCorp, [2025 IRP Vol. 1](#), March 31, 2025, Table 9.8.

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<ul style="list-style-type: none"> • 2036: West Cedar – Three Peaks 138 kV (TTC = 400, Interconnect = 200, Cost = \$14m) <p>Other East side build</p> <ul style="list-style-type: none"> • 2036: GWS 2: Aeolus to Clover #2 500 kV (TTC = 3000, Interconnect = 1990, Cost = \$1.81bn) <p>Total Cost for East Side Tx build = \$30+\$264+\$153+\$14 +\$1810 = \$2,271m</p>	
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Staff Expectation 4: In future IRPs, PacifiCorp should conduct transmission-constrained resource adequacy analysis to inform any locational constraints placed on resource acquisitions that contribute to meeting Oregon customer needs.

Additional Direction for the 2027 IRP

Beyond the remedies suggested above for key issues, Staff recommends the Commission give the Company direction for how to address other underlying modeling concerns discussed in this proceeding. For issues not requiring Commission input, Staff memorialized expectations.

Modeling Jurisdictions and Resource Adequacy

This proceeding was the first opportunity to vet the Company's new jurisdictional methodology. To arrive at overall portfolios, PacifiCorp selects resources from three separately optimized portfolios using an Excel workbook. Staff and stakeholders presented evidence that this approach is unlikely to lead to a system-wide optimized portfolio, likely induces excessive resource additions, and arrives at skewed thermal decisions.⁵³ While the Company disagrees with these assertions, it has not provided analysis or evidence to contradict them.⁵⁴ Notably, the Company has signaled openness to changing its approach in line with stakeholder recommendations for the IRP Update and the 2027 IRP.⁵⁵

One fundamental challenge of the jurisdictional methodology, as noted by Staff and RNW in opening comments, is that it does not identify whether planned resource additions are driven by reliability needs or by state policy (e.g., SB 1547 and HB

⁵³ Docket No. LC 85, [Staff's Round 2 Comments](#), October 9, 2025, p. 4f.

⁵⁴ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, p. 20f.

⁵⁵ [PacifiCorp response to OPUC Stakeholder Input Form](#), November 10, 2025.

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2021).⁵⁶ Indeed, the Company assigns all resource additions, besides Natrium, as if they are driven by policy, not resource adequacy, leading the Company's procurement plan to rely only on jurisdiction-specific RFPs. In reply comments, the Company justifies this by saying due to Oregon's coal exit in 2030, it is approximately correct to situs-assign all resource additions.⁵⁷ However, without having created an appropriate counterfactual methodology, the Company has not provided evidence that its IRP identifies resource assignments that appropriately reflect incremental resource needs associated with state policies, after reflecting reliability needs.

The modeling of resource adequacy drew attention from stakeholders because many of the issues discussed so far, such as jurisdictional allocations and deliverability requirements, were partly implemented through resource adequacy constraints. For instance, only proxy resources located in PACW were able to satisfy the Oregon WRAP constraint. PacifiCorp modeled resource adequacy as compliance with WRAP and implemented it through constraints at the jurisdiction and balancing area level. The interaction of both constraints is not well understood, contributing to the confusion of reliability and policy-driven resource additions.⁵⁸ RNW claims that errors in the manual definition of WRAP constraints led to an understatement of reliability needs, making it look as if additions were driven by policies like HB 2021.⁵⁹ Furthermore, the Company has since withdrawn from WRAP.

Staff believes that as part of developing a better counterfactual methodology, that can allocate costs while preserving a least cost system buildout, the Company should also refine its modeling of resource adequacy. Modeling of resource adequacy should anticipate compliance with resource adequacy rules, while achieving an appropriate balance between reliability and costs. The following principle, which is also suggested by RNW and Joint Stakeholders, will lead to better outcomes in the next IRP.⁶⁰

Recommendation 7: In its next IRP, PacifiCorp's modeling and analysis should start with an optimized system-wide portfolio that meets the Company's reliability needs. Incremental, state-specific needs and investments should be identified in a manner that minimizes costs and avoids overbuilding.

⁵⁶ Docket No. LC 85, [Staff Opening Comments](#), July 29, 2025, p. 36f.; [RNW Opening Comments](#), July 29, 2025, p. 12.

⁵⁷ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, p. 12ff.

⁵⁸ Docket No. LC 85, [RNW's Round 2 Comments](#), October 9, 2025, p. 11ff.

⁵⁹ Ibid.

⁶⁰ Docket No. LC 85, [RNW's Round 2 Comments](#), October 9, 2025, p. 22; [GEI, Sierra Club, OJTA, Verde, MCAT, NVEC, and CCC Round 2 Comments](#), October 9, 2025, p. 3.

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Modeling Large Loads

PacifiCorp did not include large load additions in its load forecast, arguing that resources necessitated by large loads would be governed by special contracts and not procured using the IRP to RFP channel.⁶¹ Staff acknowledges that forecasting large loads is difficult but agrees with Amazon, AWEC, CUB, and NWECC that neither complete exclusion nor inclusion of every connection request is appropriate.⁶² Furthermore, categorical exclusion of known or likely loads is inconsistent with IRP Guidelines. According to IRP Guidelines 4b and 4c, the IRP should identify energy and capacity needs to serve all expected load, with the exception of Direct Access loads (IRP Guideline 9). While the IRP does have a large-metered growth scenario, it does not provide actionable information. The resulting portfolio buildout shows that if the Company were to try serving all speculative load requests, it would have to add nearly 10 GW of new resources by 2028.⁶³ PacifiCorp does not address whether it believes this scenario to be realistic or remotely feasible.

A better methodology for considering large load growth would use verified interconnection queues, direct communication with customers, development milestones, and load telemetry as the foundation for baseline forecasts, then apply scenario modeling and dynamic adjustment levers to explore alternative futures.⁶⁴ Model credibility should be improved by published forecast-to-actual tracking. Staff believes PacifiCorp should explore these approaches before its 2027 IRP.

Recommendation 8: In its 2025 IRP Update, PacifiCorp should report on large-load interconnection requests received over the last five years and their current status (e.g. in contract negotiations, energized etc.). In its next IRP, PacifiCorp should include a realistic level of large load growth in its reference case load forecast and evaluate a meaningful range of high and low growth scenarios.

Validations of New Methodologies

A major challenge for Staff and Stakeholders in this proceeding has been to understand and vet new methodologies introduced by PacifiCorp. While the Company did introduce the concepts during stakeholder input meetings, there was no opportunity to truly understand the mechanics, especially since changes were continuously introduced until the publication of the final IRP. A best practice, currently missing, would be to validate new practices in comparison to existing practices, and explain the tradeoffs involved. Staff believes the Company should attempt to do that in future IRPs.

⁶¹ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, p. 27f.

⁶² For example, Docket No. LC 85, [Amazon's Round 2 Comments](#), October 9, 2025.

⁶³ PacifiCorp, [2025 Draft IRP Vol. 1](#), December 31, 2024, p. 280.

⁶⁴ Energy and Environmental Economics, *Forecasting Large Loads in the Age of AI and Data Centers*, December 2025, p. 11.

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Staff Expectation 5: In future IRPs, PacifiCorp should provide Staff and stakeholders an opportunity to thoroughly evaluate major methodologies, including access to meaningful workbooks, before assumptions are locked down. In addition, the Company should provide validation in comparison to existing practices and explain why PacifiCorp believes the new methodology is superior.

Clean Energy Plan

Overview

The Company's 2025 CEP shows compliance with HB 2021 with an emission reduction of 18.68 percent over the 2010 baseline, and predicts meeting goals in 2030, 2035, and 2040.⁶⁵ To achieve this, the Company's CEP identifies a need to acquire 339 MW of non-emitting resources for Oregon by 2029, and an additional 3 GW in 2030. The Company has neither addressed how to reconcile this with the IRP, in which the preferred portfolio adds an additional 679 MW for Oregon in 2029, nor how to best facilitate and pace this ambitious amount of resource additions. Staff is not reassured by the Company's assertion that "actual procurement activities based on resource-specific bids and relevant commercial operation deadlines will govern PacifiCorp's compliance position."⁶⁶ Uncertainty surrounding what exactly PacifiCorp's clean energy plan is, is at the heart of Staff's recommendation to decline to acknowledge the CEP. In coming to this conclusion, Staff considered whether the Company's procurement goals are least cost, whether the Company proposed a clear compliance plan, the modeling implementation of emission targets, market purchases, costs attributable to HB 2021, and community engagement-driven activities. Amazon, AWEC, and Joint Stakeholders also recommend non-acknowledgment for similar reasons, while other parties did not take a position.

Table 5: Resource Additions IRP and CEP

Resource Additions (MW) by 2030	Oregon IRP (% of system)	Oregon CEP	System
EE	419 (38%)	419	1,110
DR	71 (32%)	71	224
Wind	1400	1,801	2,267
Utility Solar	1570 (75%)	416	2,092

⁶⁵ Docket No. LC 85, [Clean Energy Plan](#), June 30, 2025, p. 4ff.

⁶⁶ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, p. 40.

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Small-Scale Solar	320 (100%)	275	320
Battery <8h	509 (30%)	614	1,684
Battery >24h	272 (54%)	286	511
CGC	System	System	562
Coal Retire	System	System	606
CCS	System	System	526
Total Renewable	4071(59%)	3392	6874
Total Renewable (2029)	1143 (43%)	339	2605

Least Cost, Least Risk Planning

When evaluating whether the CEP is in public interest and should be acknowledged, Staff considered the factors listed in ORS 469A.420(2).⁶⁷ Given the concerns discussed regarding the IRP, Staff does not believe there is sufficient evidence to think the CEP represents a least cost, least risk plan. Concerns about the Company's modeling choices are reinforced by the differences between CEP and IRP, which the Company states are caused by small updates to escalation rates, production tax credits, Chehalis natural gas emission price, gas prices, and DEQ emission factors.⁶⁸ While the CEP results are more in line with back-of-the-envelope calculations presented by Staff in Round 1 comments, the alignment appears more incidental than by design.⁶⁹ Furthermore, the CEP portfolio does not represent a new system-wide optimization, but simply post-hoc adjustments to Oregon's resource build-out. This leaves Staff's concerns intact that the Company has not created a model that will help identify least cost, least risk resource procurement decisions.

Overbuilding concerns are emphasized by the following graph, which was included in the Company's Round 2 comments. While Staff disagrees with the jurisdictional assignments (e.g. the reliability need is not Oregon-specific), Figure 1 shows that generation resources attributed to HB 2021 are by large unnecessary from a resource

⁶⁷ (a) Any reduction of greenhouse gas emissions that is expected through the plan, and any related environmental or health benefits; (b) The economic and technical feasibility of the plan; (c) The effect of the plan on the reliability and resiliency of the electric system; (d) Availability of federal incentives; (e) Costs and risks to the customers; and (f) Any other relevant factors as determined by the commission.

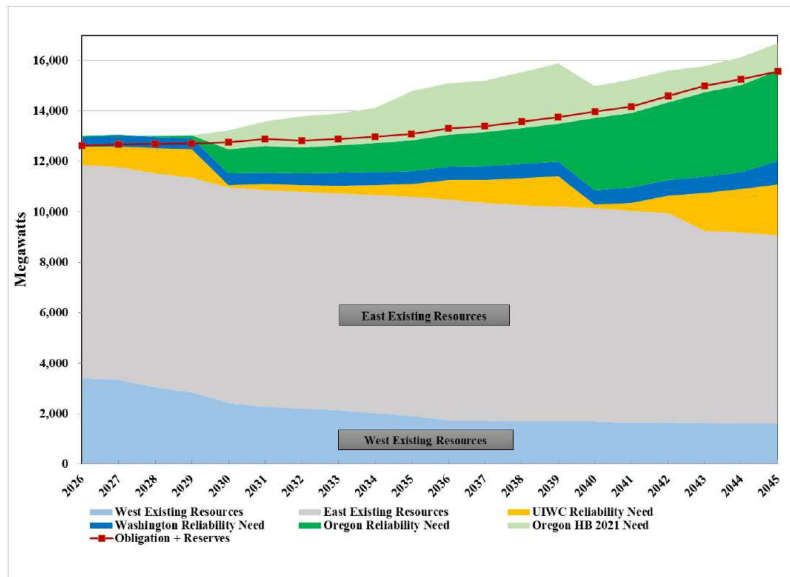
⁶⁸ This includes resource amounts and a switch to preferring wind over solar resources.

⁶⁹ Docket No. LC 85, [Staff Opening Comments](#), July 29, 2025, Figure 8.

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adequacy perspective. This implies that it should be possible to reduce costs somewhat by changing the allocation of existing resources or energy, instead of building or acquiring new resources.

Figure 1: Existing Load & Resource Position by Jurisdiction. Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, Figure F.



The Company states that it considers the IRP an improper venue to discuss this.⁷⁰ Staff disagrees. As an assessment of how to comply with clean energy targets, the CEP should reasonably consider all realistic options. Integrated resource planning is the venue to assess the costs, risks, and benefits of all major actions available to the Company, and present a comprehensive strategy based on that assessment. Without such consideration, including reallocation, Staff finds that this CEP is incomplete.

Use of Cost Drivers to Approximate Emissions Reductions

PacifiCorp's use of cost drivers and penalties to approximate emission reductions, instead of relying only on emission constraints result in nearly complete curtailment of the portion of each natural gas plant allocated to Oregon beginning in 2030 and PacifiCorp's OR-allocated GHG emissions fall well below HB 2021 requirements.⁷¹ Furthermore, the Company's use of cost drivers instead of emission constraints makes it difficult to know whether renewable additions in the OR Jurisdictional Portfolio are necessary to hit the HB 2021 target or whether artificial signals are motivating some of the additions. The Company replies that it does not believe emissions constraints to be

⁷⁰ Docket No. LC 85, [PacifiCorp's Reply Comments](#), August 26, 2025, p. 46.

⁷¹ Docket No. LC 85, [Staff Opening Comments](#), July 29, 2025, Figure 7.

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better due to chronology issues in the LT model.⁷² For context, the LT model currently builds portfolios around a few non-consecutive monthly hours which is too low of a resolution to optimize around emission constraints. However, Staff and Joint Stakeholders have criticized the lack of chronology not only in this, but also the 2023 IRP because it is inefficient and can distort the value of specific resources like batteries.⁷³ It would be best for the Company to explore how to implement emissions constraints, a basic function of PLEXOS, together with LT chronology in the next IRP. Notably, the Company has already proposed a sampled chronology in the IRP Update, which should allow experimenting with emission constraints.⁷⁴ Identifying a methodology that can achieve HB 2021 emission targets is important not only for the next CEP, but for any procurement efforts. The Company has not addressed to which degree cost drivers may distort bid selection in RFPs. Staff will have to vet this in any future RFP proceedings.

Staff does not mean to imply that emission constraints are necessarily the best way to achieve the selection of a least cost portfolio. However, the burden is on PacifiCorp to demonstrate its strategy best balances the cost, risk, and pace of GHG reductions. This is likely best achieved by testing various compliance strategies and quantitatively comparing how they perform with respect to IRP metrics.

Clean Market Purchases

Another important consideration missing from the CEP is a strategy for clean market purchases. The CEP demonstrates, given current assumptions, that Oregon cannot be allocated market purchases starting in 2035, but that cutting Oregon off from market purchases is not actually feasible.⁷⁵ Staff asked the Company to describe in an Action Item how Oregon's access to clean market purchases can be pursued.⁷⁶ Joint Stakeholders asked the Company to consider the possibility that future market purchases will have lower emissions factors.⁷⁷ The Company has not responded to these requests, but states that "the hourly clean portfolio presents the best path forward, within PacifiCorp's control, if such circumstances become apparent that make hourly clean planning the only path towards compliance, as described in the CEP. PacifiCorp has not identified any other alternative paths to explore, within its control, at this time."⁷⁸

⁷² Docket No. LC 85, [PacifiCorp's Reply Comments](#), August 26, 2025, p. 21f.

⁷³ Docket No. LC 82, [Order No. 24-073](#), Appendix A, March 19, 2024, p. 28ff; Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 47ff.

⁷⁴ PacifiCorp, [2027 IRP Public Input Meeting](#), December 17, 2025, p. 16.

⁷⁵ The Company calls this the "hourly clean" portfolio and finds that this would triple PVRR over the planning period.

⁷⁶ Docket No. LC 85, [Staff Opening Comments](#), July 29, 2025, p. 30.

⁷⁷ Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 56.

⁷⁸ PacifiCorp Response to OPUC Information Request 193.

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Staff sees the lack of access to clean market purchases as a risk to future HB 2021 compliance that the Company should initiate efforts to mitigate. Staff sees PacifiCorp's ability to address this concern as a critical dependency of the Company's resource and compliance strategy, which necessarily involves working collaboratively across the region. The Western Energy Market Governing Board has convened a working group to address how utilities that participate in EIM and EDAM can meet state and local greenhouse gas compliance requirements.⁷⁹

HB 2021 Costs

To identify HB 2021 compliance costs, PacifiCorp created a counterfactual portfolio. This portfolio costs around \$1 billion less over the planning horizon and builds 1,923 MW less of solar and wind resources, with the biggest difference in 2030.⁸⁰ Notably, the counterfactual portfolio still achieves an emission reduction of nearly 80 percent over the HB 2021 baseline, mostly attributable to Oregon's coal exit.⁸¹ PacifiCorp produced these differences by removing HB 2021 cost drivers and re-building the Oregon portfolio, while keeping all other jurisdictional selections and thermal plants constant.⁸²

RNW finds that the counterfactual analysis omits fuel costs and market purchases, likely overstating the costs of compliance.⁸³ Joint Stakeholders argue that the Company's jurisdictional methodology is sufficiently flawed that a reasonable assessment of HB 2021 compliance costs is not possible.⁸⁴ Further, AWEC argues that the Commission should immediately open an investigation into whether the anticipated cumulative rate impact of PacifiCorp's HB 2021 compliance costs will exceed the cost cap.⁸⁵

Staff appreciates the Company's attempt to parse out costs attributable to HB 2021. However, Staff agrees with Joint Stakeholders that PacifiCorp's IRP and proposed jurisdictional allocation are sufficiently flawed that an evaluation of HB 2021 compliance costs should not be completed at this time.⁸⁶ At a minimum, a true HB 2021 counterfactual portfolio would show a whole-system optimization absent Oregon GHG compliance rules. Following Staff Recommendation 7 would create a good foundation for analyzing policy-specific costs. Regarding AWEC's argument, Staff appreciates the practical discussion of cost cap implementation issues and looks forward to the

⁷⁹ California ISO, [Policy Initiative Briefing: Greenhouse Gas Accounting and Reporting Approach](#), October 2025.

⁸⁰ Docket No. LC 85, [Clean Energy Plan](#), June 30, 2025, p. 78.

⁸¹ Docket No. LC 85, [Clean Energy Plan](#), June 30, 2025, p. 96.

⁸² PacifiCorp response to OPUC Information Request 189.

⁸³ Docket No. LC 85, [RNW's Round 2 Comments](#), October 9, 2025, p. 10.

⁸⁴ Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 33.

⁸⁵ Docket No. LC 85, [AWEC's Opening Comments](#), July 29, 2025, p. 9f.

⁸⁶ Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 33.

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Commission's cost cap direction in UM 2273.⁸⁷ As such, an investigation into PacifiCorp's HB 2021 compliance costs is premature.

Resiliency, Community-based Renewable Energy, Community Impacts, and Engagement

HB 2021 includes, in addition to substantive clean energy requirements, obligations such as the consideration of resilience opportunities (ORS 469A.415 (4)(c)) community-based renewable energy (ORS 469A.415 (4)(d)), as well as community engagement and community benefits (ORS 469A.425). PacifiCorp describes its activities in these areas in the CEP, and Staff believes the Company is generally in compliance with these requirements. At the same time, stakeholders and Staff identified areas for improvement:

- Resiliency: Staff finds it unclear if or whether PacifiCorp is using its resilience analysis framework in decision making or program development.⁸⁸
- CBRE Targets: Joint Stakeholders, Multnomah County, and the city of Portland believe PacifiCorp should be required to set targets for the acquisition of community-based renewable energy (CBRE) instead of simply providing assessments (CEP Action Item 4a).⁸⁹
- CBIs: Joint Stakeholders assert that community-benefits indicators (CBI) must be improved and given more weight in procurement decisions.⁹⁰ They propose PacifiCorp adopt "disaggregated, community-level metrics such as by census tract, income bracket, or environmental justice designation."⁹¹ Additionally, they believe the Company should only procure SSRs that exceed a defined threshold of community benefits.
- Rate Impacts: Joint Stakeholders ask the Company to explicitly consider rate impacts on low-income households when developing its long-term strategy.⁹²
- Community Engagement: Joint Stakeholders argue that more resources need to be given to enable community participation, and the Company must give more weight to community input.⁹³

⁸⁷ Docket No. [UM 2273](#).

⁸⁸ Docket No. LC 85, [Staff's Round 2 Comments](#), October 9, 2025, p. 30.

⁸⁹ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 15ff.

⁹⁰ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 17ff.

⁹¹ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 18.

⁹² Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 19.

⁹³ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 19f.

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The Company does not agree with these assessments, stating that its “community engagement is evolving and valuable.”⁹⁴ Furthermore, the Company explains that requirements regarding community engagement and CBRE prescribe consideration and do not require the Company to take any specific procurement or program development actions.

The Company’s position lends support to Energy Justice advocates’ statement that advisory group meetings “presently serve as little more than symbolic forums.”⁹⁵ Staff believes the best way forward is for the Company to be more explicit in what decisions it is making or programs it is developing due to community engagement and community benefits. This holds true for most of the points identified above.

The purpose of the Company’s resiliency analysis remains opaque to Staff. PacifiCorp has identified a decent framework that answers the question of where the Company should focus its efforts: where grid reliability is the worst and people have the least resources (high vulnerability) to deal with power outages. However, it remains unclear whether or how these insights affect decision-making and program development – which presumably is the purpose of that analysis.

For CBREs, the point of PacifiCorp’s analysis is unclear because the Company explained it will not pursue any resources that are “not supported by least cost, least risk planning principles.”⁹⁶ The purpose of the analysis should be to identify CBRE as part of its actions and long-term strategy. Specific targets will likely be required as part of new administrative rules under consideration in AR 669.⁹⁷ Staff believes the Company should have some accountability for following through on CBRE development, including helping developers bring online Community Solar Program (CSP) capacity.⁹⁸

In terms of CBIs, the Company should explain what trade-offs between community benefits and other values have been identified, and which decisions, if any, are attributable to analysis of community benefits. Staff believes the identification of CBIs is best addressed through various input processes, such as the CBI advisory group (CBIAG). At the same time, Staff sees more value in a narrower set of CBIs for use in

⁹⁴ Docket No. LC 85; [PacifiCorp’s Round 2 Reply Comments](#), November 6, 2025, p. 36.

⁹⁵ Docket UM 2211, [Energy Justice Advocates’ Comments](#), June 30, 2025.

⁹⁶ Docket No. LC 85; [PacifiCorp’s Round 2 Reply Comments](#), November 6, 2025, p. 34.

⁹⁷ Docket No. AR 669, [Staff Report for the September 16, 2025, Public Meeting](#), September 10, 2025, propose OAR 860-090-0100(7).

⁹⁸ In Docket No. UM 2322, [Order No. 24-402](#), the Commission states, “[...] we are generally troubled by some of the actions by defendant [PacifiCorp] in this case and by defendant’s overall track record in interconnecting community solar projects,” November 1, 2024, p. 3.

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balancing tradeoffs of different resource strategies, than an ever-expanding framework with dozens of indicators.

Regarding rate-impacts, Staff believes such consideration at the level of long-term planning is difficult. At the same time, current rulemaking in Docket No. AR 669 does contemplate the reporting of near-term costs in the IRP/CEP.⁹⁹

While Staff and stakeholders are critical of PacifiCorp's community engagement and its efforts to secure resources with community benefits, Staff sees the absence of demonstrable connections to the Company's planning to be a primary concern. The Company must ensure that the activities described in this section produce tangible benefits for communities to maintain their legitimacy over time. The absence of clear goals, targets, and milestone within community-centered activities contributes to Staff's recommendation to not acknowledge the CEP.

Overall, Staff commends the Company for improvements to its CEP. However, underlying modeling problems and lack of detail about the Company's strategy, lead Staff to not recommend acknowledgment. While PacifiCorp's CEP presents a strategy that is generally aligned with the goals and requirements of HB 2021, it lacks a clearly defined implementation framework to support ongoing evaluation of progress. Specifically, the absence of measurable annual outcomes, interim targets, and milestone-based planning makes it difficult for regulators to assess whether the utility has a reasonable plan to make continual progress toward its statutory obligations. This does not only regard procurement including CBRE, but also the Company's gas dispatch strategy. Since 2023, the Company has identified the need to align the operation of gas plants with emission goals (now Action Item IRP 1h/ CEP 1a), but no specific actions or timelines have been proposed. To fulfill the intent of HB 2021 and enable meaningful oversight, the next CEPs should include a structured execution strategy with time-bound deliverables. Without these elements, the plan risks being aspirational rather than actionable, and the Commission's ability to evaluate compliance and effectiveness is significantly constrained.

Recommendation 9: Do not acknowledge PacifiCorp's Clean Energy Plan.

Recommendation 10: Acknowledge Action Items IRP 2b and CEP 2b under the condition that PacifiCorp, as part of its 2025 IRP Update or a separate filing before June 2026, provide a structured execution strategy with time-bound deliverables regarding procurement, allocation of existing resources, clean market purchase, and gas dispatch.

⁹⁹ Docket No. AR 669, [Staff Report for the September 16, 2025, Public Meeting](#), September 10, 2025, proposed OAR 860-090-0060(7)(g)(B).

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Recommendation 11: In its next IRP/CEP, PacifiCorp’s portfolio analysis should test various technical implementations of HB 2021 compliance (e.g. cost drivers or emission constraints), compare their performance quantitatively, and show that the Company has chosen the strategy that best balances cost, risk, and pace of greenhouse gas (GHG) reductions.

Recommendation 12: In the next CEP, PacifiCorp should demonstrate how community benefits and inputs received through engagement influenced the Company’s resource strategy, actions, and procurement approaches.

Continual Progress

Staff assesses continual progress as a separate issue and recommends the Commission address it in a separate, final order. Regarding how continual progress should be assessed, the Commission states:

Here, we confirm our intention not to define “continual progress * * * toward meeting the clean energy targets” to require utilities to pursue a linear trajectory of expected emissions reductions. Nor do we intend to assess continual progress solely or even primarily on the basis of whether emissions have declined year-over-year based on actual emissions reported to DEQ. [...] In addition to assessing the forward-looking actions identified in the planning process, we also will evaluate whether utilities are carrying out the actions in their plans (or justifying modifications to those actions).¹⁰⁰

Staff believes that an evaluation of PacifiCorp’s past actions supports a determination of continual progress. When the Commission found no continual progress in Order 24-297, Staff made three recommendations, on all of which the Company has acted:¹⁰¹

- The 2025 CEP must include an executable Action Plan: The Company’s CEP includes proposed procurements that, according to the modeling, achieve compliance with 2030 emissions goals, although, Staff finds the Action Plan does not provide sufficient detail to send market signals and promote accountability, and likely includes excessive resource amounts.
- PacifiCorp must issue an RFP as soon as feasible: The Company received Commission approval for its 2025 RFP, which was issued on October 13, 2025,

¹⁰⁰ Docket No. UM 2273, [Order No. 24-002](#), January 5, 2024, p. 28f.

¹⁰¹ Docket No. LC 82, [Order No. 24-297](#), Appendix A, August 28, 2024, p. 12ff.

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although the Commission disagreed with the Company's statements about cost allocation.¹⁰²

- The 2025 IRP/CEP must include an SSR acquisition strategy: The Company issued a SSR RFP in Oregon on July 25, 2025, and filed an SSR acquisition strategy on April 18, 2025.

Staff finds the forward-looking evaluation more difficult. On the one hand, the Company has provided a plan that predicts compliance with the 2030 emission target. On the other hand, the plan does not include sufficient detail, such as specific targets and milestones, to enable the Commission to determine in the next IRP/CEP in 2027 whether the Company has carried out necessary actions. The plan required by Recommendation 10 will be crucial for evaluating continual progress in the future.

Joint Stakeholders do not find that PacifiCorp is making continual progress: "PacifiCorp's emissions reduction strategy does not include ongoing emission reductions and is also inherently risky. As discussed, the Company's compliance plan centers around a massive clean energy procurement by the end of 2030 that will result in a rapid decline in its emissions in that year. The "just in time" strategy places all of PacifiCorp's 'eggs' into a single basket."¹⁰³

While Joint Stakeholders recognize that the Company cannot realistically procure resources with commercial operations dates (COD) earlier than 2028, they argue the law requires a more linear emissions reductions path, and hence, the Company failed to make continual progress.¹⁰⁴ Multnomah County and the city of Portland concur with these arguments. As remedy, Joint Stakeholders propose additional actions such as acquiring resources with CODs before 2028 through incentives, an open call for resources, or a reevaluation of the 2022 RFP, as well as evaluating additional demand response and surplus interconnection capacity.¹⁰⁵

The Company does not agree with these critiques, stating in its CEP, "PacifiCorp will evaluate opportunities to accelerate procurement of resources identified in the Preferred Portfolio in 2030 when evaluating proposals from the 2025 OR Situs RFP" (CEP Action Item 2b). Furthermore, "in no case will PacifiCorp reject a favorable bid in its

¹⁰² Docket No. UM 2383, [Order No. 25-343](#), August 29, 2025.

¹⁰³ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 6.

¹⁰⁴ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 11.

¹⁰⁵ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 12.

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procurement processes as a consequence of “just-in-time” model outcomes from the IRP/CEP.¹⁰⁶

Staff shares stakeholders’ concerns but believes PacifiCorp has provided information and action necessary to find continual progress – that it is acting on Commission direction from Order No. 24-297 and has created a CEP that shows compliance. Staff does not believe that the remedies suggested by stakeholders will lead to additional procurement over the ongoing RFP, which has received a robust response. Because of that, Staff sees a finding of continual progress as the best option for the Commission at this time. However, the Company must implement Recommendation 10 to enable the Commission to assess continual progress in 2027. Notably, proposed draft rules in Docket No. AR 669 emphasize looking at a utility’s Action Plan to assess continual progress.¹⁰⁷

Recommendation 13: Find that PacifiCorp is making continual progress.

Action Plan

Despite its assessment of the Company’s long-term plan, Staff believes there is value in providing acknowledgment for individual Action Items, signaling general agreement with the direction taken. The following table summarizes Staff’s recommendations and comments on all proposed Action Items.

Table 6: IRP and CEP Action Items

Item	Description	Staff Recommendation/Notes
Coal & Gas		
1a	PacifiCorp will continue to work with co-owners to develop the most cost-effective path toward an exit from the Colstrip project in Montana by 2030.	Acknowledgment per Recommendation 14. No Change from 2023 IRP.
1b	PacifiCorp will continue to work closely with co-owners to seek the most cost-effective path forward toward the 2025 IRP Preferred Portfolio target exit date of December 31, 2025.	Acknowledgment per Recommendation 14. The Company should retire Craig Unit 2 in 2028, as included in the Preferred Portfolio and stated in response to OPUC IR 4. No change from 2023 IRP.
1c	PacifiCorp will continue the process of converting Naughton Units 1 and 2 to natural gas as initiated in Q2 2023, including obtaining all required regulatory notices and filings. Natural gas operations are anticipated to commence spring of 2026.	Acknowledgment per Recommendation 14. No change from 2023 IRP.

¹⁰⁶ Docket No. LC 85; [PacifiCorp's Round 2 Reply Comments](#), November 6, 2025, p. 40.

¹⁰⁷ Docket No. AR 669, [Staff Report for the September 16, 2025 Public Meeting](#), September 10, 2025, proposed OAR 860-090-0100 (10).

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	PacifiCorp will initiate the closure of the Naughton South Ash Pond no later than the end of December 2025 when coal operations cease, and will complete closure by October 17, 2028, as required under its pond closure extension submission.	
1d	PacifiCorp will continue to evaluate the economic and technical feasibility of carbon capture technology on Jim Bridger Units 3 and 4 to comply with Wyoming's low carbon portfolio standard. The Company is pursuing a front-end engineering design study as part of compliance with Wyoming's low carbon portfolio standard requirements as a site-specific analysis is needed to better understand the feasibility of the project.	Acknowledgment per Recommendation 14. Risks and decision points addressed by Staff Expectation 3. Coordination with Idaho Power Company addressed by Recommendation 3.
1e	Following the resolution of first planning period regional haze compliance disputes, and the EPA's determination of the states' second planning period regional haze state implementation plans, PacifiCorp will evaluate and model any emission control retrofits, emission limitations, or utilization reductions that are required for coal units. PacifiCorp will continue to engage with the EPA, state agencies, and stakeholders to achieve second planning period regional haze compliance outcomes that improve Class I visibility, provide environmental benefits, and are cost effective.	Acknowledgment per Recommendation 14. Better accounting of risks addressed by Staff Expectations 2 and 3.
1f	By the end of 2025, PacifiCorp expects to finalize a commercial off-take agreement for the Natrium project. PacifiCorp will continue to monitor key TerraPower development milestones and will make regulatory filings, as applicable, including, but not limited to, a request for the Public Utility Commission of Oregon to explicitly acknowledge an alternative acquisition method consistent with OAR 860-089-0100(3)(c), and a request for a waiver of a solicitation for a significant energy resource decision consistent with Utah statute 54-17-501.	This is sufficiently complete. No acknowledgment per Recommendation 15. The IRP does not provide insight into the value of Natrium due to modeling as having zero cost. The Commission is evaluating the proposed PPA in Docket No. UM 2408.
1g	EPA finalized its approval of Wyoming's cross-state ozone state plan on December 19, 2023. This approval means PacifiCorp facilities in Wyoming are not subject to the federal ozone plan requirements. The Tenth Circuit granted a motion to stay EPA's disapproval of Utah's state ozone plan. Utah is not subject to federal ozone requirements while the stay is in place. The Utah ozone case was transferred to the D.C. Circuit in February of 2024, for adjudication of the merits, leaving the stay in place. PacifiCorp will continue to monitor developments in the Utah ozone case and adjust its plans accordingly in response to developments.	Acknowledgment per Recommendation 14. Better accounting of risks addressed by Staff Expectations 2 and 3.
1h/CEP 1a	The 2025 IRP indicates that changes in accounting and/or dispatch of existing natural gas resources may be a beneficial element of Oregon's HB 2021 compliance	Acknowledgment per Recommendation 14. Necessity for a more detailed

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	strategy and align with evolving state policies. A range of implementation strategies exist, with intertwined implications on resource allocation, market participation, and compliance requirements. PacifiCorp will meet with impacted parties, program administrators, and regulators to enable a refined analysis of the available options.	plan addressed in Recommendation 10.
1i	EPA finalized its regulation for existing coal-fueled steam units under Clean Air Act Section 111(d) in April 2024, though the rule has been challenged in the D.C. Circuit. PacifiCorp will continue to update and evaluate alternatives for affected resources while the legal process continues.	Acknowledgment per Recommendation 14. Better accounting of risks addressed by Staff Expectations 2 and 3.
1j	PacifiCorp will initiate the process of converting Dave Johnston Units 1 and 2 to natural gas, including obtaining all required regulatory notices and filings. Natural gas operations are anticipated to commence spring of 2029.	Acknowledgment per Recommendation 14. The 2023 IRP proposed to retire the units.
New Resources		
2a	PacifiCorp is continuously receiving and evaluating requests for voluntary customer programs in Utah and Oregon. PacifiCorp may use the marginal resources from future request for proposals to fulfill customer need. In some cases, customer preference may necessitate issuance of a request for proposals to procure resources within the Action Plan window. Consistent with Utah Community Renewable Energy Act, PacifiCorp will continue to work with eligible communities to develop program to achieve goal of being net 100 percent renewable by 2030; PacifiCorp filed an application for approval of a resource solicitation process for the program with the Utah Public Service	Acknowledgment per Recommendation 14.
CEP 2a	On April 23, 2025, PacifiCorp issued an OR SSR RFP. PacifiCorp will continue to investigate, develop, and pursue other strategies, as outlined in its SSR Acquisition Strategy filed concurrently with the 2025 IRP, to increase its small-scale and community-based resources. PacifiCorp will evaluate opportunities to accelerate procurement of resources identified in the Preferred Portfolio in 2030 when evaluating proposals from the 2025 OR SSR	Acknowledgment per Recommendation 14. Necessity of a more detailed plan addressed in Recommendation 10.
2b	PacifiCorp will initiate with individual jurisdictions the process to issue as appropriate by individual jurisdiction need, one or more independent Request for Proposals (RFP) to procure resources aligned with the 2025 IRP Preferred Portfolio that can achieve commercial operations by the end of December 2029. Individual independent jurisdictional RFP filings will include timelines associated with the respective jurisdictions' process.	Conditional acknowledgment per Recommendations 2 and 10.

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	Considering the differentiated resource needs by jurisdiction identified in the 2025 IRP, scope and targeted resource needs may vary by jurisdiction.	
CEP 2b	On April 16, 2025 PacifiCorp filed the draft 2025 OR Situs RFP to procure Oregon situs resources that can achieve commercial operations by the end of December 2029. PacifiCorp expects a Commission decision regarding approval of the RFP by early October 2025. Following approval, PacifiCorp will issue the RFP to market. PacifiCorp will evaluate opportunities to accelerate procurement of resources identified in the Preferred Portfolio in 2030 when evaluating proposals from the 2025 OR Situs RFP.	Conditional acknowledgment per Recommendations 2 and 10.
CEP 4a	Provide an annual CBRE assessment and report and continue to strengthen partnerships with ETO. Consider a Blue Sky Grant Program “Go-Back” strategy.	Acknowledgment per Recommendation 14. Accountability addressed in Recommendation 12.
Transmission		
3a	Initiate Local Reinforcement Projects as identified with the addition of new resources per the Preferred Portfolio, and follow-on requests for proposal successful bids.	Conditional acknowledgment per Recommendations 4, 5, and 6. Modeling improvements addressed by Staff Expectation 4.
3b	Continue permitting support for Gateway West segments D.3 and E. Initiate preliminary permitting and development activities for future transmission investments not currently included in the Preferred Portfolio. These future transmission projects can include development of additional Energy Gateway segments and exploration of new routes that have connections to other regions (i.e., connecting southern Oregon to the east with connections to the desert southwest). These activities will enable PacifiCorp to prepare for potential growth in new large loads seeking new service over the next decade.	Conditional acknowledgment per Recommendations 4, 5, and 6. Modeling improvements addressed by Staff Expectation 4.
CEP 2c	Ensure that PacifiCorp’s planning, siting, and development of Oregon-sited distribution and transmission resources minimizes impacts to PacifiCorp’s Oregon EJ Communities.	Acknowledgment per Recommendation 14 although Staff does not know what exactly this Action Item entails.
DSM		
4a	PacifiCorp will acquire energy efficiency (EE) resources as well as demand resources as indicated in its IRP.	Acknowledgment per Recommendation 14. EE targets are in alignment with Energy Trust’s savings projections for its 2026 through 2030 Multiyear Plan (MYP).
CEP 3a	In 2025, PacifiCorp will continue collaborating with the ETO to review their proposed inaugural MYP that will establish their energy efficiency targets, corresponding	Acknowledgment per Recommendation 14.

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	budgets, and cross-organization support for the next five-year period (2026-2030).	
CEP 3b	PacifiCorp will continue to expand its portfolio of DR programs by launching three new programs in 2025: Wattsmart Battery, Wattsmart Drive, and Cool Keeper. In 2026 and beyond, the Company will focus on sustaining a rapid pace of growth in existing programs, to double the total DR capacity by 2027.	Acknowledgment per Recommendation 14.
Market Purchases		
5a	PacifiCorp will acquire short-term firm market purchases for on-peak delivery from 2025-2027 consistent with the Risk Management Policy and Energy Supply Management Front Office Procedures and Practices. These short-term firm market purchases will be acquired through multiple means: Balance of month and day-ahead brokered transactions in which the broker provides a competitive price. Balance of month, day-ahead, and hour-ahead transactions executed through an exchange, such as the Intercontinental Exchange, in which the exchange provides a competitive price. Prompt-month, balance-of-month, day-ahead, and hour-ahead non-brokered bi-lateral transactions	Acknowledgment per Recommendation 14. Direction regarding clean market opportunities in Recommendation 10.
Renewable Energy Certificates		
6a	PacifiCorp may pursue unbundled REC RFPs and purchases to meet its state RPS compliance requirements. PacifiCorp will issue RFPs seeking unbundled RECs that will qualify in meeting California RPS targets through 2026 and future compliance periods, as needed.	Acknowledgment per Recommendation 14.
6b	Maximize the sale of RECs that are not required to meet state RPS compliance obligations.	Acknowledgment per Recommendation 14.
Community Engagement		
CEP 5a	PacifiCorp will continue to include an update on various elements of the CEP in the CBIAG meetings (including Tribal Nations-focused meetings) through 2025.	Acknowledgment per Recommendation 14 but see Recommendation 12.
CEP 5b	PacifiCorp will continue to offer Oregon CEP engagement series meetings, with four regular sessions scheduled in 2025, with opportunity for additional special meetings as requested or required, as an avenue for expanded learning and dialogue on key clean energy planning topics.	Acknowledgment per Recommendation 14 but see Recommendation 12.
Community Benefits Indicators		
CEP 6a	PacifiCorp has proposed two new CBI metrics, SO ₂ and NO _x , and will continue to solicit input and feedback from its advisory groups and interested parties and finalize the proposed metrics.	Acknowledgment per Recommendation 14 but see Recommendation 12.

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CEP 6b	PacifiCorp will continue refining its CBI framework, evaluating current CBIs and proposed metrics to establish a clear baseline and transparent framework for use in resource procurement, planning, and other relevant business decisions.	Acknowledgment per Recommendation 14 but see Recommendation 12.
CEP 6c	PacifiCorp will work with advisory group members and other interested parties to develop a proposal to more fully define environmental justice communities within its service area over the one to two years.	Acknowledgment per Recommendation 14 but see Recommendation 12.
Regulatory Actions		
CEP 7a	<p>PacifiCorp will engage with Oregon DEQ in any upcoming relevant rulemakings to address changes to the methodology and calculations of greenhouse gas emissions for purposes of demonstrating progress towards clean energy targets.</p> <p>PacifiCorp will continue to engage with the Commission and stakeholders in docket UM 2273 regarding the implementation of HB 2021's cost cap.</p> <p>PacifiCorp will continue to work with the Commission and stakeholders regarding PacifiCorp's request for clarification on Oregon's SSR mandate.</p> <p>PacifiCorp continues to engage with CAISO, regulators, and other stakeholders on developing a greenhouse gas accounting and reporting framework for market participation.</p>	Acknowledgment per Recommendation 14.

As seen, Staff recommends the Commission acknowledge most Action Items. Some of these acknowledgments are conditional (procurement and transmission). Staff does not recommend the Commission acknowledge PacifiCorp's plan for the Natrium nuclear reactor. The IRP did not provide insight into the value of Natrium due to it being modeled as having zero cost. As a result, any scenario without the resource was logically more expensive. On October 21, 2025, PacifiCorp informed the Commission that it had already entered a Power Purchase Agreement (PPA) with US SFR to build the Natrium commercial demonstration plant (KU1).¹⁰⁸ Hence, Staff believes this Action Item is sufficiently complete. The Commission is evaluating the proposed PPA in Docket No. UM 2408. Despite partial acknowledgments and as expressed in various recommendations, Staff expects major changes in how the Company approaches its 2027 IRP

Recommendation 14: Acknowledge IRP Action Items 1a, 1b, 1c, 1d, 1e, 1g, 1h, 1i, 1j, 2a, 4a, 5a, 6a, 6b as well as CEP Action Items 1a, 2a, 2c, 3a, 3b, 4a, 5a, 5b, 6a, 6b, 6c, and 7a.

¹⁰⁸ Docket No. UM 2408, [Application for Approval of the Water Use and Conveyance Agreement and Request for Waiver of Competitive Bidding Rules](#), October 21, 2025.

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Recommendation 15: Decline to acknowledge IRP Action Item 1f.

Staff Expectations

In this memo, Staff identified major issues for Commission consideration. However, there are many proposals and criticisms in this docket that Staff does not recommend the Commission take action on. Some of these were memorialized as Staff Expectations 1 to 5 throughout the document. In addition, there were additional issues brought forward by stakeholders that Staff did not comment on. Staff expects that the Company will consider these issues through its public input process if appropriate (**Staff Expectation 6**).

- An issue not resolved from previous IRPs is the lack of chronology in the Company's LT model.¹⁰⁹ The LT model only samples a few non-consecutive hours a month to create portfolios. This leads to shortfalls and distortions when a complete dispatch is simulated (ST model), necessitating iterative adjustments that only slowly converge toward an optimal result. Joint Stakeholders believe current reliability adjustments significantly distort the value of 4h batteries: better results would be achievable by introducing chronology in the LT model.¹¹⁰
- Joint Stakeholders make several suggestions regarding coal and markets. They believe PacifiCorp should not model the minimum-take agreements it has entered.¹¹¹ Furthermore, they suggest participation in the extended day-ahead market (EDAM) should be explicitly modeled and the Commission should investigate PacifiCorp's bidding practices.¹¹² Lastly, they believe the IRP model should be allowed to make unlimited market purchases.¹¹³
- Joint Stakeholders and RNW have identified multiple errors with potentially significant impacts on modeling results.¹¹⁴ While the Company confirmed some of these issues, it did not address to which degree they affected the results.¹¹⁵ Unless errors are addressed, Staff believes care must be taken in any proceeding where IRP-related models are being employed. Staff expects the Company to address any potential errors before the 2027 IRP.
- RNW criticized the use of static qualifying contributions (QCC) for proxy resources instead of effective load-carrying capability (ELCC) in this and the

¹⁰⁹ Docket No. LC 82, [Order No. 24-073](#), Appendix A, March 19, 2024, p. 28ff.

¹¹⁰ Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 47ff.

¹¹¹ Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 41.

¹¹² Docket No. LC 85, [Sierra Club, MCAT, GEI, and NWECC's Opening Comments](#), July 29, 2025, p. 55.

¹¹³ Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 28.

¹¹⁴ Docket No. LC 85, [RNW Opening Comments](#), Attachment A, July 29, 2025; Docket No. LC 85, [GEI, Sierra Club, OJTA, Verde, MCAT, NWECC, and CCC Round 2 Comments](#), October 9, 2025, p. 21ff.

¹¹⁵ Docket No. LC 85, [PacifiCorp's Reply Comments](#), Attachment A, August 26, 2025, p. 4f.

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2023 IRP because QCCs do not dynamically capture how the capacity contribution of resources changes based on the portfolio being built.¹¹⁶ RNW suggests the Company should determine portfolio-specific firm capacity contributions based on an ELCC framework.¹¹⁷

- CUB requests PacifiCorp to expand its modeling to include 40-50 years of historic weather or temperature data, ideally dating back to 1980, when global warming-related temperature began to increase exponentially.¹¹⁸ CUB also wants PacifiCorp to articulate budget and itemized expenses of wildfire mitigation practices within the IRP document.¹¹⁹ Lastly, CUB requests that large customers contribute more towards funding energy efficiency acquisition.¹²⁰
- Amazon requests PacifiCorp engage with existing large load customers to determine whether voluntary relinquishment of its exclusive service territory would be in the best interest of its customers.¹²¹

Staff Expectation 1: For future IRPs, the Company should develop a more nuanced assessment of end effects and explain how end effect considerations impact the Company's Preferred Portfolio and Action Plan.

Staff Expectation 2: In future IRPs, PacifiCorp should explicitly explain how the presented information supports the selection of its Preferred Portfolio, at a minimum touching on different measures of deterministic and stochastic costs, as well as regulatory, price, and technology risks.

Staff Expectation 3: In future IRPs, PacifiCorp should identify near term resource modifications and procurement actions that perform well across portfolios, including ranges and schedules, flag major decision points, and identify enabling and risk mitigation strategies.

Staff Expectation 4: In future IRPs, PacifiCorp should conduct transmission-constrained resource adequacy analysis to inform any locational constraints placed on resource acquisitions that contribute to meeting Oregon customer needs.

Staff Expectation 5: In future IRPs, PacifiCorp should provide Staff and stakeholders an opportunity to thoroughly evaluate major methodologies,

¹¹⁶ Docket No. LC 82, [Order No. 24-073](#), Appendix A, March 19, 2024, p. 46f.

¹¹⁷ Docket No. LC 85, [RNW Opening Comments](#), Attachment A, July 29, 2025, p. 14.

¹¹⁸ Docket No. LC 85, [CUB's Round 2 Comments](#), October 9, 2025, p. 5f.

¹¹⁹ Docket No. LC 85, [CUB's Round 2 Comments](#), October 9, 2025, p. 7.

¹²⁰ Docket No. LC 85, [CUB's Round 2 Comments](#), October 9, 2025, p. 8.

¹²¹ Docket No. LC 85 [Amazon's Round 2 Comments](#), October 9, 2025, p. 9.

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including access to meaningful workbooks, before assumptions are locked down. In addition, the Company should provide validation in comparison to existing practices and explain why PacifiCorp believes the new methodology is superior.

Conclusion

Based on the record in this proceeding, taking into account comments by stakeholders and Company, Staff recommends the Commission decline to acknowledge PacifiCorp's IRP long-term plan and CEP (Recommendation 1 and 9). Staff does not believe the Company has demonstrated that it has produced a least cost, least risk plan in accordance with IRP Guideline 2c. The Company has not been able to sufficiently address serious concerns raised by Staff and stakeholders regarding modeling choices and proposed actions.

Staff recommends conditional approval for procurement Action Items (IRP: 2b, CEP: 2b), recognizing that while urgent action is required by the Company, the Commission needs more information to judge the reasonableness of those actions, especially regarding procurement to maintain system reliability (Recommendation 2). As an additional condition, Staff believes PacifiCorp should provide the Commission with a structured execution strategy with time-bound deliverables for reaching HB 2021 compliance in 2030 (Recommendation 10). Staff recommends acknowledgment of transmission Action Items (IRP: 3a, 3b) with conditions that provide safeguards regarding the Company's B2H strategy (Recommendations 4, 5, 6).

Staff recommends the Commission give explicit directions for the Company's next IRP/CEP, emphasizing changes necessary for developing a better long-term strategy and a concrete Action Plan (Recommendations 3, 7, 8, 11, 12). Lastly, Staff recommends the Commission acknowledge Action Items that are clearly reasonable, despite concerns about the overall plan (Recommendation 14), unless sufficiently complete (Recommendation 15).

Separately, while Staff is concerned about future progress towards HB 2021 goals due to lacking detail in the Company's Action Plan, Staff does recommend the Commission determine that PacifiCorp has achieved continual progress (Recommendation 13). This is based on the fact that the Company has acted on the remedies listed in Order No. 24-297 and filed a CEP that shows compliance with emission targets.

PROPOSED COMMISSION MOTION:

1. Decline to acknowledge PacifiCorp's 2025 Integrated Resource Plan (IRP) long-term resource strategy and 2025 Clean Energy Plan (CEP) (Recommendation 1, Recommendation 9).

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2. Acknowledge the IRP Action Items 1a, 1b, 1c, 1d, 1e, 1g, 1h, 1i, 1j, 2a, 4a, 5a, 6a, 6b and CEP Action Items 1a, 2a, 2c, 3a, 3b, 4a, 5a, 5b, 6a, 6b, 6c, and 7a (Recommendation 14).
3. Acknowledge the following IRP and CEP action items with conditions:
 - a. Acknowledge Action Items IRP 2b and CEP 2b under the conditions that PacifiCorp, as part of its 2025 IRP Update or a separate filing before June 2026,
 - i. Present a resource acquisition plan that addresses system reliability as well as state-specific needs and includes annual targets and important milestones (Recommendation 2), and
 - ii. For HB 2021 compliance, provide a structured execution strategy with time-bound deliverables regarding procurement, allocation of existing resources, clean market purchase, and gas dispatch (Recommendation 10).
 - b. Acknowledge IRP Action Items 3a and 3b, under the conditions that PacifiCorp
 - i. File quarterly progress reports in Docket No. LC 85 on B2H that include a description of the proactive steps the Company has taken and is planning to take to acquire BPA redirect rights from Longhorn to PACW, updates on any BPA studies, and all other information impacting the forecasted or actual availability of B2H (Recommendation 4),
 - ii. File a report in Docket No. LC 85 that explains the Company's decision-making before taking steps to commit B2H westbound transmission capacity to an individual customer (Recommendation 5), and
 - iii. As part of its 2027 IRP and unless BPA redirect rights have already been acquired, provide analysis demonstrating the relative costs and risks of transmission investments with and without B2H redirects as well as analysis estimating the value of BPA redirect rights (Recommendation 6).
4. Decline to acknowledge IRP Action Item 1f (Recommendation 15).
5. Direct the Company to include the following analytical approaches in the next IRP/CEP and/or IRP/CEP Update:
 - a. In its next IRP, PacifiCorp should provide a plan regarding the future of Jim Bridger Units 3 and 4 that is consistent with that of Idaho Power Company (Recommendation 3).

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- b. In its next IRP, PacifiCorp's modeling and analysis should start with an optimized system-wide portfolio that meets the Company's reliability needs. Incremental, state-specific needs and investments should be identified in a manner that minimizes costs and avoids overbuilding (Recommendation 7).
 - c. In its 2025 IRP Update, PacifiCorp should report on large-load interconnection requests received over the last five years and their current status (e.g. in contract negotiations, energized etc.). In its next IRP, PacifiCorp should include a realistic level of large load growth in its reference case load forecast and evaluate a meaningful range of high and low growth scenarios (Recommendation 8).
 - d. In its next IRP/CEP, PacifiCorp's portfolio analysis should test various technical implementations of HB 2021 compliance (e.g. cost drivers or emission constraints), compare their performance quantitatively, and show that the Company has chosen the strategy that best balances cost, risk, and pace of greenhouse gas (GHG) reductions (Recommendation 11).
 - e. In the next CEP, PacifiCorp should demonstrate how community benefits and inputs received through engagement influenced the Company's resource strategy, actions, and procurement approaches (Recommendation 12).
6. Find that the Company has demonstrated that it is making continual progress towards meeting HB 2021 emission goals (Recommendation 13).

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