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February 14, 2022

SENT VIA WUTC WEB PORTAL

Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Re: PacifiCorp's Draft All-Source Request for Proposals,
Docket UE-210979

Dear Director Maxwell:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in response to the Notice of Opportunity to File Written Comments on PacifiCorp's Draft Request for Proposals, pursuant to WAC 480-107. Public Counsel believes that the Washington Utilities and Transportation Commission ("Commission") should approve PacifiCorp's (the "Company") All-Source Request for Proposals with conditions. The condition that Public Counsel seeks is that the Company provide additional details about how it plans to use the equity questionnaire responses in evaluating bids.

Public Counsel's Recommendation

Public Counsel recommends that the Commission approve PacifiCorp's All-Source Request for Proposals with conditions.

PacifiCorp's request for proposals (RFP) was issued following the Company's 2021 Integrated Resource Plan (IRP). The preferred portfolio for the IRP included 1,345 MW of wind and solar resources and 600 MW of co-located energy storage resources to be in operation by December 31, 2026. The IRP also included 274 MW of new demand-side resources. The Company issued this system-wide all source RFP and will issue a separate demand-side resource RFP later in 2022.

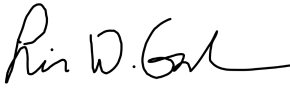
Public Counsel appreciates the opportunity to review the draft RFP and provide input, particularly on the Washington specific components of the document. We also appreciate the Company's efforts to provide additional information to stakeholders via technical conferences.

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The Company has provided a detailed non-price scoring matrix in Appendix L. PacifiCorp's RFP also includes an equity questionnaire in Appendix P. The Company is requiring that all bidders fill out the questionnaire, which will be used in the evaluation process. However, neither the narrative RFP document nor Appendix P provide a detailed description as to how the Company plans to conduct its evaluation of bids which would serve Washington customers. Because this is the first time that PacifiCorp is using customer benefit indicators and other detailed equity information in the evaluation of Washington resources, Public Counsel believes that it is important to give some sense of how the evaluations will be used, other than whether or not they are completed. Public Counsel asks that the Commission condition its approval of PacifiCorp's RFP on PacifiCorp providing more detail about how the Company will use equity questionnaire responses in evaluating bids.

We appreciate the opportunity to provide comments and look forward to reviewing other stakeholder comments. If you have any questions about this filing, please contact either Stephanie Chase at (206) 521-3212 or via email at Stephanie.Chase@ATG.WA.GOV.

Sincerely,

/s/ 

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LWG/SC