

Agenda Date: January 24, 2007
Item Number: A1

Docket: UE-070117

Company Name: PacifiCorp Power and Light Company

Staff: Yohannes Mariam, Regulatory Analyst

Recommendation

Approve PacifiCorp's petition for temporary exemption from WAC 480-100-238(4) and allow the Company to file its draft electric integrated resource plan (IRP) by February 19, 2007, instead of January 20, 2007, the original due date.

Background

The Pacific Power & Light Company ("PacifiCorp" or "the Company") filed its 2004 IRP on January 20, 2005. Under WAC 480-100-238(4), PacifiCorp was expected to file its draft 2006 IRP by January 20, 2007. The Company indicated it is unable to file the draft plan on time and needs an additional one month to file its 2006 IRP document that meets the requirements of the Commission's IRP rule.

The Company operates and is subject to rules in five jurisdictions. The Company's IRP is expected to incorporate issues originating in each jurisdiction that affect its IRP. The Company filed its IRP and request for proposal (RFP) based on analysis of system-wide supply and demand for electricity. The Company has produced high quality IRPs and provided Commission staff with regular IRP updates after consistently submitting its final IRP to the Commission.

PacifiCorp has requested an extension of its IRP filing and exemption from the rule because of the need to (i) incorporate significant feedback from stakeholders, (ii) evaluate the impact of disapproval of the Company's 2012 RFP by the Oregon Public Utility Commission (OPUC) and pending request for approval of the same RFP by the Utah Public Service Commission, and (iii) changes to the components of the IRP adopted by the OPUC. In order for the Company to produce a document that contains these matters, the Company initially requested a three month extension. However, staff advised the Company that a three month extension is too long. Staff advised the Company to expedite the process to produce a document that meets the requirement of the applicable WAC in less than three months.

The Company filed a revised request asking for an extension to submit an IRP that meets all requirements of the WAC by February 19, 2007. The Company proposes to file the final version by March 30, 2007. Further, the Company promises to continue its tradition of submitting to staff updated versions of the final IRP plan. Extension of the filing deadline for the 2006 IRP does not mean that the schedule for future IRP filings will change. Instead, the Company will file its 2006 plan by February 19, 2007, but will file its next resource plan by January 20, 2009.

Consequently, the exemption is temporary and is intended to allow the Company enough time to produce a comprehensive resource plan.

Conclusion

Staff has reviewed PacifiCorp's petition and believes that it is reasonable to grant the Company's request for extension by about a month. Staff has not received any complaints from stakeholders with respect to the proposed delay in filing the 2006 IRP. Therefore, staff recommends that the Commission approve PacifiCorp's request to delay the filing of the draft version of the IRP until February 19, 2007, and the final version by March 30, 2007.