

Agenda Date: March 26, 2009
Item Number: A3

Docket: UE-090413
Company Name: Pacific Power and Light Company

Staff: Deborah Reynolds, Regulatory Analyst

Recommendation

Issue an order approving Pacific Power and Light Company's (PacifiCorp or company) request for a temporary exemption from the filing deadline in WAC 480-100-238(4), thereby amending Order 01 in Docket UE-081475 and allowing the company to file its 2008 integrated resource plan (IRP) on May 29, 2009.

Background

On December 11, 2008, the Utilities and Transportation Commission (commission) granted PacifiCorp's petition requesting modification of the filing deadline for the company's IRP to March 31 of each odd-numbered year, commencing with the 2008 IRP being filed by March 31, 2009.¹

On March 18, 2009, PacifiCorp filed a petition requesting a one-time modification of the filing date for its 2008 IRP from March 31, 2009, to May 29, 2009.

Discussion

In its petition, the company explains its recent decision to postpone a major resource in its East Control Area as the result of "the worsening recessionary environment," among other reasons. The company further explains that as part of its review of the postponement, it "developed a load forecast reflecting an updated assessment of recessionary impacts on load growth throughout the company's service territory." This is expected to have some effect on the resource needs for the West Control Area, of which Washington is a part.

The company committed to staff that, if granted the extension, the draft IRP would be available by April 13, 2009. This meets the company's commitment in its 2008 petition for an extension² that the draft IRP would be available for a 30-day public review and comment period before the final IRP is issued.

In staff's review of PacifiCorp's past performance when granted extensions on its IRP, staff found that the company:

¹ Docket UE-081475, Order 01, Paragraph 12.

² Docket UE-081475, Original Petition.

- complied with its deadlines or timely-filed requests for amendment of the deadlines,
- filed updates to its 2007 plan as suggested by staff's previous memo,³ and
- regularly updated staff on its planning schedule.

The company intended to file its final IRP on March 31, 2009, followed by updates as it completed the analysis described above. Staff has found that the selection and timing of the lowest reasonable cost resource is strongly impacted by the accuracy of the load forecast. Because the regional and national economic growth is slowing significantly, granting the temporary exemption more appropriately serves the public interest and the underlying purpose of the IRP rule. If the commission grants the temporary exemption, the company will file a final IRP that is based on an updated load forecast and that incorporates public comments afforded by the company's commitment to the thirty-day review period.

Staff reiterates the following conditions from Order 02, Docket UE-070117.

- Future IRP filings will be made in a timely manner even when there are unresolved issues with other state regulatory commissions;
- All interested stakeholders and participants will be notified of the change in the filing date of the IRP.

Conclusion

Staff has reviewed the company's petition and believes that it is reasonable to grant the company's request because an updated load forecast improves the accuracy of the selection and timing of the lowest reasonable cost resource. Therefore, staff recommends the commission issue an order approving Pacific Power and Light Company's request for a temporary exemption from the filing deadline in WAC 480-100-238(4), thereby amending Order 01 in Docket UE-081475 and allowing the company to file its 2008 integrated resource plan on May 29, 2009.

³ See Docket UE-070117.