

WUTC Data Request 34

Rohini Ghosh states, in RG-1T at 21 line 11, that “PacifiCorp’s analysis indicates that [it] only needs 240 MW of CETA-compliant resources to comply with the law above what system procurement is expected to provide”

- (a) Is the 240 MW of renewable resources part of the resources identified for the 2022 AS RFP? Or was this a separate resource need that was identified?
- (b) Does this system procurement include identified resources in the 2022 AS RFP?

Response to WUTC Data Request 34

- (a) The 240 megawatts (MW) of Clean Energy Transformation Act (CETA) compliant resources identified in PacifiCorp’s 2023 Biennial Clean Energy Implementation Plan (CEIP) Update, as referenced in PacifiCorp’s direct testimony, refers to a Washington-specific resource need identified in 2030 at the earliest, given the timing of CETA’s established greenhouse gas (GHG) neutral standard that begins in 2030.

Each Integrated Resource Plan (IRP) cycle establishes an action plan for the next two to six years, at most. Then a request for proposals (RFP) might be issued to solicit resource options for procurement, guided by the most recent action plan. PacifiCorp’s 2022 All Source Request for Proposals (2022AS RFP), issued after PacifiCorp’s 2021 IRP, contemplated resources that were expected to come online before 2028. Thus, the 2022AS RFP was not the relevant point in time to assess resources that could be procured and cost-allocated situs to Washington for the purpose of 2030 CETA compliance.

- (b) PacifiCorp clarifies that the analysis performed to reach the estimated 240 MW of Washington-specific need for CETA compliance, as included in the 2023 Biennial CEIP Update, was based on PacifiCorp’s 2023 IRP published on May 31, 2023. The 2022AS RFP was issued to the market on April 29, 2022. There was no initial shortlist (ISL) or final shortlist (FSL) for the 2022AS RFP bid resources available to be included in the modeling at the time the 2023 IRP was published. With that clarification, PacifiCorp responds as follows:

No. “This system procurement” as referenced in the request in subpart (b) above did not include resources from PacifiCorp’s 2022AS RFP.

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