

### WUTC Data Request 53

- (a) Does PacifiCorp agree with OPUC Staff analysis in OPUC Redacted Staff Report re: Determination of continual progress in the 2023 IRP and CEP, docket LC-82 that the “...Company chose to take resource actions that increase reliance on market purchases, bilaterally contract for storage at unknown prices, build more gas plants, increase reliance on coal plants and speculative [Carbon Capture, Utilization and Storage (CCUS)] technology all while falling short of emission reduction targets”?<sup>2</sup> If the answer is anything other than an unequivocal yes, please provide a narrative explanation as to why.
- (b) Please provide Staff with the initial 2022 AS RFP shortlist.

### Response to WUTC Data Request 53

- (a) No. The Public Utility Commission of Oregon (OPUC) staff conflates resource actions with the resource planning process. Resource actions, discussed in the action plan of PacifiCorp’s Integrated Resource Plan (IRP), are steps taken to procure real-world resources. Resource planning cannot incorporate the same level of real-world detail used to support individual resource decisions for all resources in PacifiCorp’s portfolio over a multi-decadal horizon. As a result, the preferred portfolio does not represent a decision to take particular actions for each and every item identified. Resource actions and resource planning are related, as resource decisions are considered in light of the range of expected conditions over the life of the resource (or contract), with those expected conditions reflecting resource planning estimates. As a result, resource planning can be used to support particular resource actions and decisions, but it is only pertinent for those decisions that have fully developed information and require timely action to move forward.

In 2023, PacifiCorp opted to suspend its 2022 All Source Request for Proposals (2020AS RFP), deferring long-term resource commitments until the impacts of a stay on the Ozone Transport Rule (OTR), a rulemaking from the United States (U.S.) Environmental Protection Agency (EPA) regarding greenhouse gas (GHG) emissions, wildfire risk and liability, and implications of evolving extreme weather risks could be further assessed.

After taking the time to consider these factors and considering the financial health of the Company, PacifiCorp focused on procuring battery storage contracts capable of achieving commercial operation by summer 2026 to meet system needs. Further, PacifiCorp does not agree with OPUC staff’s claim that PacifiCorp is falling short of emission reduction targets.

(b) PacifiCorp did not complete an initial shortlist (ISL) before the 2022AS RFP was suspended.

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<sup>2</sup> OPUC Redacted Staff Report re: Determination of continual progress in the 2023 IRP and CEP, docket LC-82 (Aug. 8, 2024), p. 10-11, available at <https://edocs.puc.state.or.us/efdocs/HAU/lc82hau330463025.pdf>.

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