

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFIC POWER & LIGHT COMPANY,
a division of PacifiCorp

Petitioner,

DOCKET UE-180259

**Pacific Power's Petition for Waiver of
WAC 480-100-238(4)**

1 In accordance with WAC 480-107-002(3) and WAC 480-07-370(3), Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, petitions the Washington Utilities and Transportation Commission (Commission) for a waiver of the requirement to submit its integrated resource plan (IRP) within two years after the date on which the previous plan was filed with the Commission in WAC 480-100-238(4) (Petition).

2 Pacific Power is an electric company and public service company in the State of Washington within the meaning of RCW 80.04.010, and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Washington. The company provides electric service to approximately 130,000 retail customers in Washington and approximately 1.9 million total retail customers in Washington, California, Idaho, Oregon, Utah, and Wyoming.

3 Pacific Power's name and address:

Washington Dockets
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
washingtondockets@pacificorp.com

Matthew McVee
Chief Regulatory Counsel
PacifiCorp
825 NE Multnomah Street, Suite 1800
Portland, OR 97232
matthew.mcvee@pacificorp.com

I. INTRODUCTION AND BACKGROUND

4 In accordance with WAC 480-100-238(4), Pacific Power is required to submit its IRP within two years of the date on which the previous IRP was submitted. The 2017 IRP was submitted to the Commission on April 4, 2017.¹ The Commission directed Pacific Power to file its next IRP on or before March 31, 2019.²

5 In response to input from stakeholders and state commissions, Pacific Power is developing an economic analysis of its coal units that will inform the subsequent portfolio-development phase of the 2019 IRP, including an assessment of regional haze compliance alternatives and a broad range of sensitivity studies. On December 3-4, 2018, Pacific Power presented preliminary studies on its coal unit economic analysis at an IRP public-input meeting. This analysis identified potential reliability challenges that must be resolved before the coal studies can be completed.

6 To enable Pacific Power to complete the necessary analysis to develop a least-cost, least-risk preferred portfolio while allowing sufficient time for stakeholder review and input, additional time is required in the preparation of its 2019 IRP. Pacific Power respectfully requests an extension of the filing date for the 2019 IRP from March 29, 2019, to no later than August 1, 2019. This extension will enable Pacific Power to complete its economic analysis of coal units, while appropriately accounting for system reliability, and necessary additional portfolio analysis. Pacific Power will continue its robust and transparent stakeholder-input process with additional monthly public input meetings scheduled up to the extended filing date to ensure stakeholders are kept up-to-

¹ The Commission granted a temporary exemption from WAC 480-100-238(4) on March 29, 2017. *In the Matter of Pacific Power & Light Company*, UE-160353, Order 1 (March 29, 2017).

² Mark Johnson May 7, 2018 letter to Etta Lockey (Commission finding that Pacific Power's 2017 IRP met the requirements of RCW 19.280.030 and WAC 480-100-238).

date regarding the Company's analysis and overall progress. The Company communicated its intent to seek this extension to stakeholders and additional public-input meeting dates during the January 24, 2019 public input meeting. Pacific Power's updated IRP work plan is enclosed as Attachment A.

II. CONCLUSION

7 Due to the foregoing, the Company requests a waiver of WAC 480-100-238(4) to be able to submit its 2019 IRP by August 1, 2019.

DATED: this 29th day of January, 2019.

Respectfully submitted,

/s/

Matthew McVee
OSB No. 020735
Chief Regulatory Counsel
Pacific Power & Light Company
825 NE Multnomah Street, Suite 1800
Portland, OR 97232
(503) 813-5585
matthew.mcvee@pacificorp.com

Counsel for PacifiCorp