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***VIA ELECTRONIC FILING***

Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**Re: Docket UE-230812 – PacifiCorp Draft 2025 Integrated Resource Plan (IRP) Filing**

Under WAC 480-100-625 (1-3), WAC 480-100-640 (1), in accordance with Order 01 of docket UE-230786 and in compliance with requirements of the Clean Energy Transformation Act (CETA)<sup>1</sup>, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp), submits the enclosed draft of its 2025 IRP (Draft 2025 IRP). PacifiCorp has included the following components as part of this filing:

- **Draft IRP Document**, which includes the following draft sections available to date:
  - Volume I
    - Chapter 1 – (Executive Summary)
    - Chapter 2 – (Introduction)
    - Chapter 3 – (Planning Environment)
    - Chapter 4 – (Transmission)
    - Chapter 6 (Load and Resource Balance)
    - Chapter 7 (Resource Options)
    - Chapter 8 (Modeling and Portfolio Evaluation)
    - Chapter 9 (Modeling and Portfolio Selection Results)
    - Chapter 10 (Action Plan)
  - Volume II
    - Appendix A – (Load Forecast)
    - Appendix B – (Regulatory Compliance)
    - Appendix C – (Public Input Process)
    - Appendix D – (Demand-Side Management)
    - Appendix E – (Grid Enhancement)
    - Appendix F – (Flexible Reserve Study)
    - Appendix G – (Plant Water Consumption Study)
    - Appendix I – (Capacity Expansion Results)
    - Appendix L – (Distributed Generation Study)
    - Appendix M – (Stakeholder Feedback Forms)
    - Appendix O – (Washington Clean Energy Action Plan)
    - Appendix P – (Acronyms)

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<sup>1</sup> WAC 480-100-625(3).

PacifiCorp will be releasing supporting workpapers on Tuesday, January 8, 2025.

PacifiCorp began development of its 2025 IRP in January 2024 with a series of public-input meetings, which addressed a range of topics describing PacifiCorp's modeling methodology and inputs and assumptions for the 2025 IRP. Agenda items covered topics including, but not limited to, resource cost-and-performance assumptions, load forecast, price-policy scenarios, market price assumptions, and transmission options that will be considered as part of the 2025 IRP. All public-input meeting materials are included with responses to stakeholder feedback forms finalized as of December 31, 2025, in Attachment C.

PacifiCorp has been meeting with Commission Staff on a bi-weekly basis for the last five months to discuss the company's Draft 2025 IRP, as well as its modeling approach, planning assumptions, and how to incorporate new CETA-related requirements. Throughout these conversations, PacifiCorp has been clear regarding the information and analysis that will and will not be available in the initial Draft 2025 IRP. PacifiCorp has also worked with Commission Staff to identify additional information and analysis that will be available during the pendency of the Commission's review of the Draft 2025 IRP. These conversations have been extremely helpful and PacifiCorp appreciates the Commission's stated intention to provide flexibility for utilities as they move through the various stages of their 2025 IRP filings.<sup>2</sup>

PacifiCorp continues the IRP process with the following next steps:

- January 22-23, 2025 – General Public Input Meeting 8 - anticipated topics are the draft, feedback received, and the CPA
- February 26-27, 2025 – General Public Input Meeting 9 - anticipated topics are the draft, feedback received, and the CPA

PacifiCorp looks forward to providing its final 2025 IRP to the Commission on March 31, 2025.

PacifiCorp respectfully requests that all communications related to this proceeding be sent to the following:

By Email: [WashingtonDockets@pacificorp.com](mailto:WashingtonDockets@pacificorp.com)  
[IRP@pacificorp.com](mailto:IRP@pacificorp.com)

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

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<sup>2</sup> Docket Nos. UE-190698 and UE-191023 (consolidated), General Order R-601, page 59 (December 28, 2020).

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Please direct informal questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/ Matthew McVee

Matthew McVee

Vice President, Regulation Policy and Operations

PacifiCorp

825 NE Multnomah Street, Suite 2000

Portland, OR 97232

(503) 813-5585

[Matthew.Mcvee@PacifiCorp.com](mailto:Matthew.Mcvee@PacifiCorp.com)

Enclosure

230812-PAC-COS-12-31-24.pdf

230812-PAC-2025-Draft-IRP-Vol-1-12-31-24.pdf

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