



825 NE Multnomah Street, Suite 2000  
Portland, Oregon 97232

April 3, 2024

Received  
Records Management  
Apr 3, 2024

***VIA ELECTRONIC FILING***

Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, Washington 98503-1036

**Re: UE-210979—Notice of Cancellation of PacifiCorp’s 2022 All-Source Request for Proposal**

On December 29, 2021, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) filed its 2022 All Source Request for Proposal (2022AS RFP) in the above referenced docket. Section 3.a. provided a proposed schedule with some milestones but noted that the schedule is subject to change. On July 25, 2023, PacifiCorp updated its website to inform interested parties of an update to its RFP milestone schedule indicating the selection of the final short list (2022AS FSL) was scheduled for September 17, 2023.

On September 18, 2023, the Company filed notice that the date for PacifiCorp’s 2022AS FSL would be delayed and committed to providing additional information by the end of September. On September 29, 2023, the Company filed notice that it was suspending the 2022AS RFP PacifiCorp in order to evaluate changing conditions while making critical decisions for the long-term benefit of its system and customers.

As evaluated in PacifiCorp’s 2023 Integrated Resource Plan (IRP), the Environmental Protection Agency’s (EPA) Ozone Transport Rule (OTR) significantly restricted energy production in the summer among natural gas and coal-fueled resources in Wyoming and Utah, which triggered a need for the procurement of certain incremental resources. EPA’s approval of Wyoming’s state OTR plan and the 10<sup>th</sup> Circuit Court of Appeals’ stay of EPA’s disapproval of Utah’s state OTR plan removes the restrictions that limit energy production in the summer from natural gas and coal-fueled resources in Wyoming and Utah. It was prudent and in the best interest of customers to analyze the impact of the EPA’s approval of the Wyoming state OTR plan and the stay of the disapproval of the Utah state OTR plan on procurement decisions. On April 1, 2024, the Company published an update to the 2023 IRP that reflects the current status of the OTR. The 2023 IRP Update preferred portfolio demonstrates that with limited procurement of battery resources in the near-term, which can be achieved outside of a request for proposals process, there is a material benefit to scaling down and delaying resource acquisition until after 2030. This outcome supports the Company’s initial decision to suspend the 2022 All-Source Request for Proposals, and the termination of the 2022 All-Source Request for Proposals. The 2025 IRP will inform the next steps for incremental resource acquisition.

