



U.S. DEPARTMENT OF ENERGY

Northwest Clean Energy Application Center

Promoting CHP, District Energy, and Waste Heat Recovery

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March 24, 2011

COMMENTS ON PACIFICORP 2011 INTEGRATED RESOURCE PLAN

Draft Version for Public Comment

The Northwest Clean Energy Application Center has reviewed in detail the draft version for public comment of the PacifiCorp 2011 Integrated Resource Plan (IRP) with a focus on combined heat and power (CHP) and distributed generation in the western service territory (Washington, Oregon and Idaho). The following points are made:

1) Industrial scale CHP technical potential appears to be seriously under-counted in the western service territory. PacifiCorp has a wide variety of industrial facilities in its western service territory that could house and co-fund CHP. Key industrial sectors in PacifiCorp's western service territory include food processing, forest products, and pulp & paper. A study prepared by Energy and Environmental Analysis (now ICF) for Oak Ridge National Laboratory, Report No. B-REP-04-5427-004r, shows major CHP potential for the Northwest. While this study is on a state by state basis, it clearly shows that significant potential is omitted in the PacifiCorp IRP. See http://www.northwestcleanenergy.org/NwChpDocs/Chp_Market-Assessment_In_PNW_EEA_08_2004.pdf;

2) The Governor of Oregon has a major forest products CHP initiative with funding for feasibility studies. This will trigger the development CHP projects. See http://www.oregon.gov/ENERGY/BUSINESS/oregon_forest_products_energy_project.shtml;

3) PacifiCorp has considerable anaerobic digestion CHP technical potential in its western service territory, especially within the dairy industry. The size of these systems can range in electrical production from .75 MW to 2 MW and higher. The draft IRP at page 42 showing .05 MW is greatly understated. For a list of dairy digesters in Washington State that are under development or have come online see <http://www.northwestcleanenergy.org/NwChpDocs/WA%20Clean%20Energy%20CHP%20projects%20v2%2012%202010.pdf>. Idaho dairy digester anaerobic digesters tend to be larger in size;

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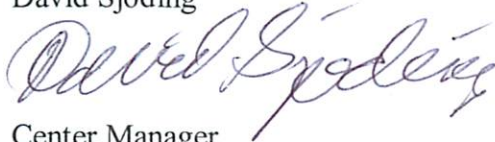
4) The PacifiCorp IRP adds an annual 14% administrative charge per year for distributed generation (page 40). No explanation is given as to why this percentage is so high or necessary beyond the year of signing a Power Purchase agreement; and

5) Development of a quality analysis of the economic potential for CHP and other forms of distributed generation takes considerable thought. Other utilities in the northwest are using co-ownership and co-funding arrangements with smooth interconnection processes. PacifiCorp is encouraged to take into consideration the economic development and energy efficiency benefits of these options. For an example of the energy efficiency benefits see the U.S. Department of Energy website http://www1.eere.energy.gov/industry/distributedenergy/chp_basics.html and their report at

http://www1.eere.energy.gov/industry/distributedenergy/pdfs/chp_accomplishments_booklet.pdf

Thank you for the opportunity to submit comments.

David Sjoding

A handwritten signature in cursive script that reads "David Sjoding". The signature is written in dark ink and is positioned to the right of the printed name.

Center Manager