

**Exh. ASR-14
Docket UE-220376
Witness: Andrew Rector**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFICORP, d/b/a PACIFIC POWER
& LIGHT COMPANY,**

Respondent.

DOCKET UE-220376

**EXHIBIT TO
TESTIMONY OF**

ANDREW RECTOR

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Docket UE-200420, PacifiCorp Motion for Exemption from WAC 480-100-625(3)

October 21, 2022

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP, dba PACIFIC POWER &
LIGHT COMPANY,

Motioner,

DOCKET UE-200420

Motion for Exemption from WAC 480-
100-625(3)

I. INTRODUCTION

I In accordance with Washington Administrative Code (WAC) 480-100-008, WAC 480-07-110, WAC 480-07-370, and WAC 480-07-375, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company), respectfully requests that the Washington Utilities and Transportation Commission (Commission) issue an order approving an exemption from WAC 480-100-625(3), which details the required contents of a draft Integrated Resource Plan (IRP) and states the Commission will hear public comment on the draft IRP filed by PacifiCorp on January 4, 2021. Consistent with PacifiCorp's previous comments in Docket U-191023, PacifiCorp's January 4, 2021 draft IRP filing does not include a preferred portfolio and supporting analysis, including associated scenarios and sensitivities. As such, PacifiCorp's January 4, 2021 filing does not meet the draft IRP criteria described in WAC 480-100-625(3). Instead of conducting a recessed open meeting on February 22, 2021, to hear comments on PacifiCorp's draft IRP filing, PacifiCorp respectfully requests that the Commission reschedule the open meeting and Company presentation until after the Company files its final IRP on April 1, 2021. Further the Company requests the Commission allow a comment period on the Company's final IRP and an opportunity for PacifiCorp to file reply comments prior to the open meeting. Comments would still be filed on the draft IRP as scheduled by

February 5, 2021. The Company's request is in the public interest by focusing these efforts on the final IRP and consistent with the purpose of WAC 480-100-625(3). The Company has discussed this Motion with Commission Staff and Staff has indicated their support of this Motion.

2 PacifiCorp is an electric utility and public service company doing business in the State of Washington under RCW 80.04.010, and its public utility operations, retail rates, service, and accounting practices are subject to the Commission's jurisdiction. PacifiCorp also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in Idaho, Utah, and Wyoming. The Company's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon, 97232.

3 PacifiCorp's name and address:

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

Carla Scarsella
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
carla.scarsella@pacificorp.com

In addition, PacifiCorp respectfully requests that all data requests be addressed to:

By e-mail (preferred) datarequest@pacificorp.com

By regular mail Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

II. DISCUSSION

4 WAC 480-100-625(3) provides that

No later than four months prior to the due date of the final IRP, the utility must file its draft IRP with the commission. At a minimum, the draft IRP must include the preferred portfolio, CEAP, and supporting analysis, and to the extent practicable all scenarios, sensitivities, appendices, and attachments.

WAC 480-100-625(3)(a) provides that

The commission will hear public comment on the draft IRP at an open meeting scheduled after the utility files its draft IRP. The commission will accept public comments electronically and in any other available formats, as outlined in the commission's notice for the open meeting and opportunity for comment.

WAC 480-100-625(3)(b) provides that

The utility must file with the commission completed presentation materials concerning the draft IRP at least five business days prior to the open meeting.

WAC 480-100-625(3), (3)(a), and (3)(b) were adopted by the Commission in General Order R-601, served on December 28, 2020, in rulemakings related to adopting rules related to the Clean Energy Implementation Plan and the Clean Energy Transformation Act and amending and adopting rules related to IRPs.¹

5 PacifiCorp filed its draft IRP on January 4, 2021, as required under WAC 480-100-625(3). As noted in its filing letter accompanying its draft IRP, due to the progressive nature of PacifiCorp's multi-state, system-wide IRP development process, PacifiCorp has just begun the modeling phase of the 2021 IRP, which necessarily follows an extensive process of updating inputs, methodologies, and assumptions. In addition, PacifiCorp has been working to implement new modeling software for the 2021 IRP,

¹ *In the Matter of Adopting Rules Relating to Clean Energy Implementation Plans and Compliance with the Clean Energy Transformation Act; In the Matter of Amending or Adopting rules to WAC 480-100-238, Relating to Integrated Resource Planning*, Docket Nos. UE-191023 and UE-190698 (cons.), General Order 601 Adopting Rules Permanently (Dec. 28, 2020).

which has added workload to the 2021 IRP development process. As a result, PacifiCorp has not completed any model runs used to establish resource portfolios and to evaluate costs and risks at this time. At this time, the Company is working to produce preliminary modeling discussions at its upcoming January 28-29, 2021 public-input meeting. Going forward, PacifiCorp will consider ways to improve the timing of its IRP development process in light of Washington's recently adopted rules to implement the Clean Energy Transformation Act.

6 Because its draft IRP filing did not include certain elements under WAC 480-100-625(3), PacifiCorp believes that the open meeting scheduled on February 22, 2021, to hear comments on this filing should be delayed until after the Company files its final IRP in April 2021. Furthermore, as recommended by Staff in discussing the Company's filing of this Motion, the Company requests that the Commission allow stakeholders an additional period to provide written comments after the Company files its final IRP and an opportunity for the Company to file reply comments prior to the rescheduled open meeting. Granting the Company's request to postpone the open meeting and allow for written comments will allow stakeholders the benefit of having reviewed and considered the Company's complete IRP, including its preferred portfolio.

IV. CONCLUSION

7 PacifiCorp respectfully requests that the Commission issue an order approving the Company's request to exempt it from WAC 480-100-625(3) and reschedule the open meeting and Company presentation required under the rule until after the Company has filed its final IRP. Public interest will be served by postponing the open meeting regarding the Company's IRP and its request is consistent with the purpose of WAC 480-100-625(3).

