

**Exh. ASR-13  
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**

*PacifiCorp 2021 IRP Feedback Form Submitted by Commission Staff, Dec. 11, 2020*

**October 21, 2022**

# PacifiCorp - Stakeholder Feedback Form

## 2021 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2021 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

Date of Submittal 12/11/2020

\*Name: Jim Woodward

Title: Regulatory Analyst

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Phone: (360) 664-1302

\*Organization: WA Utilities & Transportation Commission (WA-UTC)

Address: Click here to enter text.

City: Click here to enter text. State: Click here to enter text. Zip: Click here to enter text.

Public Meeting Date comments address: 12/3/2020  Check here if not related to specific meeting

List additional organization attendees at cited meeting: \_\_\_\_\_

**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Coal retirement variants, recommended sensitivity, price-policy scenario contents (i.e., SC-GHG methodology), Colstrip 3&4 early closure/divestiture economic analysis update.

Check here if any of the following information being submitted is copyrighted or confidential.

Check here if you do **not** want your Stakeholder feedback and accompanying materials posted to the IRP website.

**\*Respondent Comment:** Please provide your feedback for each IRP topic listed above.

### **Commission Staff Feedback for PacifiCorp 2021 IRP: Public Interest Meeting #6 (Dec 3, 2020)**

This feedback, dated December 11, 2020, states the informal comments, questions, recommendations, and data requests of Washington Utilities and Transportation Commission Staff, Jim Woodward. Staff appreciates the continued work of PacifiCorp's IRP Team and the opportunity to participate. Timely feedback is offered as technical assistance and is not intended as legal advice. Staff reserves the right to amend these opinions should circumstances change or additional information be brought to our attention. Staff opinions are not binding on the commission.

This staff feedback document is divided into three parts: 1) questions & comments regarding PacifiCorp's December 3 PIM #6 presentation content, 2) staff update re: company proposal to model Colstrip 3&4 closure/divestiture earlier than 2025 as part of the 2021 IRP process, and 3) WA 2021 electric IRP compliance template updated to reflect WA-UTC's [draft final IRP rule](#) (12/4/20 release date).

Company response by **December 31, 2020**, is appreciated for select questions and requests in **BOLD**.

\* Required fields

I. **Public Interest Meeting #6 (12/3) – Presentation questions & comments**

1. Jim Bridger Units 1 and 2 (slide 5) – Excluding the 2023 coal retirement variant for both Jim Bridger Units 1 and 2, the other four operating variants for each unit violate WA CETA’s requirement that “on or before December 31, 2025, each electric utility must eliminate coal-fired resources from its [WA] allocation of electricity,” pursuant to [RCW 19.405.030](#)(1)(a) assuming current state allocations for this plant remain. **Please confirm that if PacifiCorp’s 2021 preferred portfolio (PP) ultimately selects one of the later operating variants for Bridger 1 and 2, Jim Bridger will be removed from WA rates in accordance with CETA.**

**PacifiCorp Response:**

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Thank you for the feedback. PacifiCorp will comply with the rules implementing the CETA legislation.

2. Naughton Units 1 and 2 (slide 8) – Based on discussion that occurred during PIM #6, **WA staff concur with OR staff’s request to consider Naughton retirement earlier than 2025.** While WA staff acknowledge that WA ratepayers are not responsible for Naughton, the arguments made about Naughton’s relative operating inefficiency and the plant not being a candidate for gas conversion due to its high altitude are persuasive. The modeling team should at least consider the impact to PacifiCorp’s system a Naughton retirement earlier than 2025 would have.

**PacifiCorp Response:**

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Thank you for this feedback. PacifiCorp will consider this request, balanced with requests from other stakeholders and time constraints.

3. Jointly owned coal units operating variants (slide 13) – **Please see Sec II response re: WA-UTC staff’s perspective on the Colstrip 3&4 closure/divestiture economic analysis.**
4. Other studies (slide 18) - **How is WA’s required maximum customer benefit sensitivity covered by the 6 proposed sensitivities listed?** As a reminder, per [draft final WAC 480-100-620](#)(10)(c), this sensitivity should model the maximum amount of customer benefits described in [RCW 19.405.040](#)(8) prior to balancing against other goals.

**PacifiCorp Response:**

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The maximum customer benefit study was listed on slide 15 of the December 3, 2020 public input meeting slide deck as a required study for the 2021 IRP.

5. Price-policy scenario update (slide 35) – Staff appreciates the IRP modeling team’s verbal walk-through of PacifiCorp’s two-step approach to accounting for the social cost of greenhouse gas emissions (SC-GHG) during PIM #6. As staff have stated during numerous meetings and in a variety of email correspondence to the company, the SC-GHG methodology will be a prime area of scrutiny during WA’s 2021 IRP cycle. To this end, **staff strongly encourage Pac to include their SC-GHG modeling methodology in the company’s draft IRP to be filed by 1/4/21.** To capture what was discussed during PIM #6, **this methodology should go into detail how Pac’s SC-GHG:**
  - a. Price-policy assumptions will determine resource selection and
  - b. Dispatch cost adder will appropriately price the SC-GHGs into actual utility operations.

**PacifiCorp Response:**

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Thank you for the feedback. PacifiCorp included discussion of its SC-GHG modeling methodology in its Draft 2021 IRP filed at the Washington Utilities and Transportation Commission on January 4, 2021.

II. **Staff update re: PacifiCorp's proposal for a Colstrip 3&4 closure/divestiture economic analysis**

As discussed during staff's Mon, 12/7, IRP bi-weekly check-in with the company, PacifiCorp proposes addressing staff's request for an economic analysis of closing/divesting Colstrip 3&4 earlier than 2025 as part of the 2021 IRP portfolio development process. Specifically, the Pac IRP team proposed a "bookend" approach by developing case(s) that would close/divest Colstrip as early as the end of 2022 and as late as 2027.

After internal discussion, **staff accept PacifiCorp's proposal with the following caveats:**

1. The case study approach needs to be able to **isolate the effects of a Colstrip 3&4 closure/divestiture on Pac's broader system**. If an early Colstrip closure/divestiture is not part of Pac's 2021 IRP PP, Pac's case approach should calculate the additional cost of closing/divesting Colstrip early relative to the PP.
2. **PacifiCorp should be ready to discuss the results of this Colstrip 3&4 early closure/divestiture economic analysis during the WA-UTC's 2/22/21 recessed Open Meeting devoted to PacifiCorp's 2021 IRP.**

**PacifiCorp Response:**

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Thank you for this feedback, PacifiCorp appreciates the ongoing discussions regarding this analysis. While PacifiCorp understands that Staff's request focuses primarily on an economic analysis, the company notes that there are other factors that may impact any closure timeline such as regulatory and operational requirements.

III. **Updated WA 2021 electric IRP compliance template**

As promised during staff's Mon, 12/7, IRP bi-weekly check-in with the company, **please find attached an updated WA 2021 electric IRP compliance template**. This Excel spreadsheet includes the following updates to the file staff originally circulated with Pac on 6/26 following PIM #1:

- Rule references (*see column C*) have been changed to reflect the WA-UTC's [draft final IRP rule](#) (12/4/20 release date). Generally, the IRP contents section has been changed from -610 to -620.

Sub-section -610(10) Scenarios and sensitivities (*see spreadsheet rows 38 & 39*) now details the minimum two scenarios and one sensitivity required per rule.

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**Data Support:** If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

Revised WA 21 electric IRP compliance template provided for reference and inclusion in company's draft 21 IRP filing.

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated. Staff strongly recommends company populate the revised WA 21 electric IRP compliance template and submit as an appendix with PacifiCorp's 21 draft IRP due to the WA-UTC by 1/4/21.

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Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.