

Attachment 6

Selected PacifiCorp Public Responses to Sierra Club Data Requests

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- 1 PacifiCorp Response to Sierra Club Data Request 08
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Please reference Tables 9.14 and 9.15 in the IRP. The variant P02h-JB3-4 RET, which is the variant with the early retirement of Jim Bridger Units 3 and 4, has a PVRR that is \$169 million, or \$164 million on a risk adjusted basis, less than the Company's preferred portfolio, P02-MM-CETA. Does the variant P02-JB3-4 RET comply with the CETA requires as identified in RCW 19.405.030, 040, and 050? If no, please identify the specific statutory citation for which the variant's portfolio is not compliant.

Response to Sierra Club Data Request 08

No. PacifiCorp's 2021 Integrated Resource Plan (IRP) variant P02h-JB3-4 RET is not compliant with Clean Energy Transformation Act (CETA). Note: PacifiCorp has not determined specific CETA compliance requirements applicable to the variant portfolio P02h-JB3-4 RET.

First, Revised Code of Washington (RCW) 19.405.050 (2) and (3) require the Company to pursue all cost-effective, reliable, and feasible conservation and deficiency resources, and demand response (DR). The cost-effectiveness of such resources must be based on integrated resource planning as specified in RCW 19.280 and RCW 19.280.030 requires that integrated resource planning consider the social cost of greenhouse gas (GHG) emissions. To incorporate this requirement, the energy efficiency (EE) selections for the state of Washington in P02-MM-CETA reflect what was cost-effective in the P02-SC portfolio, which was developed assuming the social cost of carbon is applied to all emitting resources, rather than the P02-MM portfolio. Because of the higher costs when the social cost of carbon is assumed, more EE is cost-effective in the P02-SC portfolio. When these additional measures are added to the P02-MM portfolio and evaluated under medium GHG costs they are no longer cost-effective and result in a higher cost for the portfolio. This increase in costs is not present in the P02h-JB3-4 RET portfolio results and would be required for CETA compliance. Note: PacifiCorp has not determined what EE additions would be necessary for the P02h-JB3-4 RET portfolio to be CETA-compliant.

Second, in accordance with RCW 19.405.040 (1), PacifiCorp must demonstrate compliance with generation from non-emitting and renewable resources. While the P02-MM portfolio has a wide range of clean and renewable resources, only the portion of each resource's generation that is included the rates of Washington customers counts toward compliance with this obligation. As a result, an incremental 160 megawatts (MW) solar/wind/storage hybrid resource was added to the P02-MM portfolio. Unlike most other resources in the P02-MM portfolio which are shared among PacifiCorp's various jurisdictions, 100 percent of this resource is assumed to be included in the rates for Washington customers. While the P02h-JB3-4 RET adds or accelerates clean and renewable resources, most of those resources would be allocated to other states, so additional resources to ensure compliance with RCW 19.405.040 (1) would likely still be

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required. PacifiCorp has not calculated the specific resource additions necessary to bring P02h-JB3-4 RET into compliance with this statute.

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Once the Jim Bridger Units 1-2 have been converted to natural gas peakers, what portion, if any, will be allocated to Washington customers?

Response to Sierra Club Data Request 10

In the context of PacifiCorp's Final Clean Energy Implementation Plan (CEIP), the Company assumed that Washington customers were allocated a 0 percent share of the Jim Bridger Unit 1 and Jim Bridger Unit 2 natural gas converted units beginning January 1, 2024. This statement was a tentative view of a question that is part of ongoing analysis being addressed in future multi-state protocol (MSP) allocations, and no final decisions have been made. The Company will continue to evaluate if a Washington allocation of the converted units would be appropriate based on the outcome of ongoing discussion on the post-interim period interjurisdictional allocation in the MSP.

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