

Appendix A

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
1	2021-05-13	Observer or Public Comment	EAG Meeting 1	Stakeholder Engagement	There are lots of good options for public participation. I would be interested in seeing responsiveness to equity issues in the PacifiCorp service area beyond assessments and learnings from Department of Health assessments (for example, contractor-led assessment of what equity looks like). There is deeper work at hand about why this needs to happen to inform discussion in meetings to expand equity focus.	PacifiCorp's Public Participation Plan and the Clean Energy Implementation Plan focus on identifying historic barriers to equity.	Answered in Meeting
2	2021-05-13	Current EAG member	EAG Meeting 1	CETA	What was PacifiCorp doing on clean energy before CETA? Is this new?	PacifiCorp has been working on clean energy for some time. The CEAP and CEIP formalizes and standardizes that work.	Answered in Meeting
3	2021-05-13	Current EAG member	EAG Meeting 1	CETA	Will this process be deployed across other states in PacifiCorp's territory?	There are separate ongoing stakeholder processes that have a multi-state scope, and some of these issues will be addressed for other states through those processes.	Answered in Meeting
4	2021-05-13	Current EAG member	EAG Meeting 1	CETA	Washington customers represent a small customer base for PacifiCorp. However, there is significant interstate transmission between other states in PacifiCorp's service territory. This process raises interstate issues that allow utilities to sometimes bypass customer input. Will we be discussing any Federal issues that are being handled across state lines in PacifiCorp's territory?	PacifiCorp is a multistate entity serving six states. Through this process, the EAG and PacifiCorp will discuss the complexities across state lines.	Answered in Meeting
5	2021-05-13	Current EAG member	EAG Meeting 1	CETA	What's the process for partnering with other utilities to share best practices?	PacifiCorp collaborated with other utilities in Washington to share best practices for this process and will continue to do so going forward.	Answered in Meeting
6	2021-05-13	Current EAG member	EAG Meeting 1	EAG Process	PacifiCorp is looking to the EAG to provide input into how the utility can better deliver equitable solutions to communities that the EAG represents. But PacifiCorp is an investor-owned utility with shareholders that they need to satisfy. Regarding the input that the EAG will be giving: is it more about practical solutions that fit the mold, or input that PacifiCorp will evaluate and decide what is best to implement?	One of the key outcomes of the EAG process is Customer Benefit Indicators (CBIs), which are metric driven. We are looking to the EAG to help answer: what should we be measuring, how do we apply those to CETA compliance, and to the CEIP? How do we really measure community benefits and community impacts? There are many layers, and programs are just one layer of this. The way the EAG engages can be very in-depth. On the planning side of things, we are currently completing our integrated resource plan (IRP). This includes the 10-year Clean Energy Action Plan (CEAP) and the 4-year CEIP. The IRP will also include energy efficiency targets for the state. Together, we will make sure benefits are equitably distributed from the implementation of the CEAP. We haven't finished the analysis, and we don't know what the impact on 4-year planning will look like. As we move through this process, we will have a better view of it, and it will inform the EAG's work as well.	Answered in Meeting
7	2021-05-13	Current EAG member	EAG Meeting 1	EAG Process	Work Definition Feedback from the EAG: <ul style="list-style-type: none"> Equity Include specific language on the most underserved communities, and tie these definitions together (i.e., using "highly-impacted communities"). Include actions that the utility could take like "providing individuals with different resources or program adjustments." Environmental justice This definition could use more specificity like "sustainable use of natural resources," "improving air quality," and "improving waste management services." It should include more language about access to these resources in addition to the kinds of communities. Energy justice No comments. Energy burden Consider the relative component of income (i.e., burden relative to income). Consider industrial and commercial customers and how costs are distributed to customers from those industries. Energy security "Affordability" depends on who you are, so revise the definition to "equitable price" or "equitably affordable price." Vulnerable populations Be specific about what is being accessed (e.g., food, capital, credit). Highly-impacted community This definition should account for ownership. If people don't own their own homes, they can't access the same affordability programs as homeowners. We should align with the Washington State definition on this. 	Working definitions were amended to incorporate additional EAG Member Feedback	Answered in Meeting
8	2021-05-13	Current EAG member	EAG Meeting 1 Feedback Survey	Stakeholder Engagement	In response to additional organizations to consider for the EAG: Yakima Landlord tenant association, Yakima county health coordinator or equivalent position	Member from Yakima County Health District was invited and joined the EAG.	Added to Stakeholder List
9	2021-05-13	Current EAG member	EAG Meeting 1 Feedback Survey	EAG Process	I hope we do have some 'lived experience' members on the EAG or perhaps a workshop with PPL customers.	Comment acknowledged and considered in ongoing implementation process.	Comment noted
10	2021-05-13	Current EAG member	EAG Meeting 1 Feedback Survey	Stakeholder Engagement	In response to additional organizations to consider for the EAG: Trade Allies come to mind. They are in the field. They are helping shape consumer decisions.	Suggestion was considered in the stakeholder identification process.	Added to Stakeholder List
11	2021-05-13	Observer or Public Comment	EAG Meeting 1 Feedback Survey	Stakeholder Engagement	In response to additional organizations to consider for the EAG: Neighborhood Health Clinic	Yakima Neighborhood Health Services was contacted by email with no response.	Added to Stakeholder List
12	2021-05-14	Observer or Public Comment	EAG Meeting 1 Feedback Survey	CBI	The public participation forum during the second half of the meeting could have been more robust. I think only one public observer spoke. To comply with CETA rules around public participation, Pac needs to solicit more input from its customers when developing customer benefit indicators (CBIs).	Comment acknowledged and considered in ongoing implementation process.	Comment noted
13	2021-05-14	Observer or Public Comment	EAG Meeting 1 Feedback Survey	Translation	In response to a question concerning the need for meeting translation: Meeting translation should represent the languages spoken within PacifiCorp's WA service territory.	EAG Meeting Materials are translated and posted to the PacifiCorp CETA Website.	Process adjusted accordingly
14	2021-05-14	Observer or Public Comment	EAG Meeting 1 Feedback Survey	EAG Process	Considering meeting times outside normal work hours (e.g., in the evenings) to encourage a wider cross-section of attendees, especially those from the general public.	Acknowledged. In response, PacifiCorp set up 3 public meetings in September, October, and November 2021 that were scheduled for evening hours.	Process adjusted accordingly
15	2021-05-14	Observer or Public Comment	EAG Meeting 1 Feedback Survey	EAG Process	Recording meetings for optional playback, in case interested stakeholders are unable to attend a given meeting.	Acknowledged. In lieu of recording meetings, PacifiCorp prepared and posted public meeting notes following every EAG meeting.	Process adjusted accordingly
16	2021-05-14	Observer or Public Comment	EAG Meeting 1 Feedback Survey	Stakeholder Engagement	Consider reaching out to Pac's peer WA IOU Avista to better understand ways to engage tribal nations within both IOUs' WA service territories (i.e., Yakama Nation in Pac's territory, Colville Nation in Avista's territory).	Acknowledged. PacifiCorp was pleased to have a representative from Yakama Power be a member of the EAG.	Comment noted
17	2021-05-14	Current EAG member	EAG Meeting 1 Feedback Survey	PacifiCorp Information	In future meetings, I would like to learn more about how PacifiCorp is planning to support and fund upgrades relevant to the transition to clean energy to offset the cost burden to customers. What data will be shared to influence the EAG process? At any point, will targeted feedback from community members and businesses be gathered to enhance insight and planning relevant to the objectives?	Comment acknowledged and considered in ongoing implementation process.	Process adjusted accordingly
18	2021-05-14	Current EAG member	EAG Meeting 1 Feedback Survey	Stakeholder Engagement	In response to additional organizations to consider for the EAG: Yakima Housing Authority and La Casa Hogar .	La Casa Hogar has been added to the EAG.	Added to EAG
19	2021-05-14	Current EAG member	EAG Meeting 1 Feedback Survey	Stakeholder Engagement	In response to additional organizations to consider for the EAG: Shawn Collins at The Energy Project.	The Energy Project declined participation in the EAG.	Added to Stakeholder List
20	2021-05-17	Current EAG member	EAG Meeting 1 Feedback Survey	Stakeholder Engagement	In response to additional organizations to consider for the EAG: I think Yakima Union Gospel Mission would be a helpful addition.	Suggestion was considered in the stakeholder identification process.	Added to Stakeholder List
21	2021-06-16	Observer or Public Comment	EAG Meeting 2	Stakeholder Engagement	In regards to public participation: What is the timing of the public session?	PacifiCorp is still exploring what makes the most sense, but due to COVID, the online survey is currently the primary vehicle to getting input. There are opportunities to expand this reach or try different approaches.	Answered in Meeting
22	2021-06-16	Observer or Public Comment	EAG Meeting 2	Stakeholder Engagement	Will an update of the CEIP/EAG teams' progress be presented at the June 24-25 IRP Public Input Meeting?	[Note: PacifiCorp has since included three additional public sessions in September, October, and November 2021] PacifiCorp is open to this, recognizing that the meeting is for stakeholders across multiple jurisdictions.	Answered in Meeting

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
23	2021-06-16	Current EAG member	EAG Meeting 2	Named Communities	<p>In response to the question: "What ways do you think clean energy and energy programs could help or complicate the challenges that you identified", the EAG highlighted:</p> <p>Advantages highlighted: Environmental benefits, clean air, healthier people Improved education as a result of resources/services being available Access to younger people through school programs to educate them on energy conservation Distributed generation could result in more local benefits</p> <p>Complications/challenges highlighted: Will this increase energy costs? Addressing the lack of understanding of the programs or benefits Utilities need reliable, cost-effective power supply, so unclear how clean energy development costing will be approached and what scale is needed Avoiding vulnerable populations shouldering the burden of clean energy development (e.g. cost, land) Distributed generation may cost more Many community members rely on gas heating; electric furnaces may have higher equipment and usage costs Economic disparities in the community, such as high vs. low-income users, renters vs. property owners Transportation-related challenges such as public transportation Electricity storage in order to integrate renewables Affordable housing, and incentivizing landlords to invest in their properties How will this process address businesses? Translations are critical to getting through the language barriers</p> <p>Additional considerations PacifiCorp should ensure they are providing relatable, easy to understand information to the community, especially to rural, high-barrier communities which will result in a more trusting relationship. The EAG needs to be able to have and provide pertinent information to the communities they serve as the communities ask questions. There may be opportunities for PacifiCorp to take advantage of community organizations' existing needs assessments processes to gather data. PacifiCorp should consider phone calls or in person surveys, not just online, to expand the reach. The EAG expressed interest in resources (especially with graphics) to ensure they can clearly communicate PacifiCorp's clean energy objectives outside this meeting venue to community members. Jobs are a salient issue in this area – how they are created or impacted – that PacifiCorp should consider sharing more about.</p>	Incorporated into ongoing implementation process.	Input incorporated
24	2021-06-16	Observer or Public Comment	EAG Meeting 2 Feedback Survey	Named Communities	Additional vulnerable populations and challenges: Rural, low income, agricultural workers, tribal members; Access to economic opportunity/development, access to broadband internet, access to affordable healthcare, access to reliable transportation	Acknowledged. These populations and challenges were added/considered.	Comment noted
25	2021-06-16	Observer or Public Comment	EAG Meeting 2 Feedback Survey	Named Communities	Additional vulnerable populations and challenges: Low income population; health effects, health care access	Acknowledged. These populations and challenges were added/considered.	Comment noted
26	2021-06-16	Current EAG member	EAG Meeting 2 Feedback Survey	EAG Process	Visuals would be helpful-- I do think some training around how energy systems work (graphics) would be helpful & what "clean energy" flows/systems would look like...AND, what that means for all from a community level, family unit level, and individual level (as INDIVIDUAL REDACTED) talked about...action opportunities)	PacifiCorp has incorporated this feedback into the EAG Process to provide more time to foundational knowledge of clean energy. PacifiCorp also included "Community Outreach and Engagement" as a Utility Action in its CEIP to include the development of a webpage to host educational resources.	Process adjusted accordingly
27	2021-06-16	Current EAG member	EAG Meeting 2 Feedback Survey	Stakeholder Engagement	Additional Groups to Consider: Nuestra Casa, individual stipends for youth participants (you could talk to the organization, Yakima Música en Acción), Trabajadores Unidos por la Justicia, Latino Community Fund A few thoughts:	Suggestion was considered in the stakeholder identification process.	Added to Stakeholder List
28	2021-06-16	Current EAG member	EAG Meeting 2 Feedback Survey	Stakeholder Engagement	<p>1) I really think hiring or giving stipends to a group of Promoters/Trusted Messengers to push out the PacifiCorp survey will be critical to getting feedback that more accurately will reflect the communities here. Often times, surveys try to have proportional responses to the population; but in this situation, our communities who are most impacted by environmental disparities/health risks may need to have disproportionately higher participation in order to move something forward that is equitable. I hope that makes sense-- feel free to email me about this comment if it's not making sense as I type it.</p> <p>2) Just reiterating that I think a lot of people on our EAG (including myself) and definitely in the community in general may have a vague understanding of what "clean energy" means...as I mentioned above, but also the larger context state-wide, nationally and globally. I feel like there's a lot of education that could be done in fun ways to help us all be on the same page.</p> <p>3) I think there's also room for folks representing different sub-sectors of our community to share more first-hand what some of the realities/barriers/assets & strengths are. I wondered a lot if the group is collectively thinking about the range of dynamics such as: Yakama native experiences/realities, immigration status-related barriers, and also especially communities with smaller population percentages, such as AAPI communities whose history in the Valley is deeply impacted by systemic oppression & historical trauma & exclusion; black communities and history of systemic exclusion of opportunities to thrive locally. I just wonder if overall, more shared knowledge of the contexts of our region & how those impact various sub-communities might be helpful & also be a tool for trust & relationship building in this group overall. In Yakima, many conversations defer to orient around white folks, then in "equity" conversations-- it begins to include Latinx or Yakama communities; meanwhile, there are many other communities with smaller population numbers who remain excluded or pushed to margins in the conversations. It'd be nice to know more about assets/strengths (in addition to barriers) so that we're coming at this from how to reinforce & make more available the strengths/assets to be applied, not only the barriers/challenges we need to "solve". I hope that makes sense!</p> <p>Those are some thoughts! Thanks for all of your work & attitudes of openness to feedback, learning & listening!</p>	Comment acknowledged and considered in ongoing implementation process.	Comment noted
29	2021-06-16	Observer or Public Comment	EAG Meeting 2 Feedback Survey	Stakeholder Engagement	Pac should develop a robust communications and outreach plan for their proposed survey if the company means to mainly rely on it as the public participation measure for the CEIP. Working with EAG members to help access their communities seems very important to be able to receive relevant feedback. What do EAG members feel will be helpful to get responses? What strategies do their organizations use to try to reach underserved populations? Undoubtedly, it is challenging to do this, especially the first time around, but I hope that Pac will be creative and consult with EAG members and other WA utilities as they do this work.	Acknowledged. PacifiCorp plans to continue to engage its EAG on these important issues.	Comment noted
30	2021-06-17	Current EAG member	EAG Meeting 2 Feedback Survey	Stakeholder Engagement	Additional group to consider: WW Immigrant Rights Coalition possibly	Suggestion was considered in the stakeholder identification process.	Added to Stakeholder List
31	2021-07-01	Observer or Public Comment	Public Survey	CETA	How were the results from PacifiCorp's clean energy benefit survey and how will they be used?	PacifiCorp issued a public survey in July and August. While specific responses will not be shared, overall customer feedback was incorporated into the CBI Weighting process. Public survey results were posted on PacifiCorp's CEIP website.	Comment noted
32	2021-07-21	Current EAG member	EAG Meeting 3	PacifiCorp Information	Have you seen an increase in the usage of low-income programs over the last year recognizing the effect COVID-19 has had on Yakima and Washington?	Predominantly, we saw an increase in federal assistance, such as emergency rental assistance the rescue plan. There is a pending request to increase the capacity of our low-income bill assistance program.	Answered in Meeting

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33	2021-07-21	Current EAG member	EAG Meeting 3	PacifiCorp Information	Were the surveys mentioned in the slide already completed, and are they different from the customer survey that recently went out? How are customers receiving those surveys? Some of my community is only reachable by phone, for example.	The survey's described in the slide have already been completed by PacifiCorp. PacifiCorp conducts a number of surveys. The residential surveys are completed every two years. There are more regular customer satisfaction surveys. These are in addition to the survey recently sent out to CEIP stakeholders, the EAG, and customers.	Answered in Meeting Notes
34	2021-07-21	Current EAG member	EAG Meeting 3	CBI	Do we see a drop in electricity consumption as a possible [CBI] outcome?	The surveys normally administered by PacifiCorp are distributed through email. However, for the current CETA related CBI development surveys, PacifiCorp is using various approaches. Emails with a link, it's available through the CEIP website, and several of our EAG stakeholders are distributing hardcopies to community members. Yes. Overall consumption is influenced by many factors including things like weather which can have a significant impact on consumption over given periods of time. Certain types of programs (like energy efficiency programs) are important for customers and for the utility of managing overall load. While in many cases program participation will reduce participants' consumption, it is like that CBIs related to consumption will focus on improved awareness and education and equitable participation in programs.	Answered in Meeting Notes
35	2021-07-21	Current EAG member	EAG Meeting 3	PacifiCorp Information	How was the WattSmart program implemented during COVID impacted by the change in instruction method?	For 2020, in response to COVID-19, Be Wattsmart at home presentations were conducted online with digital presentations and interactive web components. Despite being a digital program in 2020, the program met its outreach goals of reaching 3,399 students and 144 teachers with 47 school presentations. The same number of school presentations were given in 2019. Students also completed "Home Energy Worksheets" which are used as part of a home energy audit activity. Twenty percent of the worksheets were completed in 2020, down from 53 percent in 2019. We believe this drop in returned worksheets was due to COVID-19.	Answered in Meeting Notes
36	2021-07-21	Current EAG member	EAG Meeting 3	Named Communities	In response to what additional vulnerable populations PacifiCorp should consider: Minority business owners, such as those that qualify for Community Development Block Grants. Near low income individuals; the EAG provided the United Way term: Asset Limited, Income Constrained, Employed (ALICE). People with medical equipment at home.	The list of vulnerable populations was updated.	Input incorporated
37	2021-07-21	Current EAG member	EAG Meeting 3	CBI	Could a CBI be created around reducing energy burden, or even percent of income paid to utilities (as this would be for all users), because many of the "unknown" challenges are linked to resources available to the customer? Who was involved in matching CBIs to the challenges we raised in the previous meetings?	We didn't see a direct impact the utility could have in these cases, which is why we categorized them as unknown. We agree that it's probable that we could have an indirect positive impact by lowering energy burden. PacifiCorp's renewable portfolio team, load forecasting team, low-income programming, customer solutions, care center, and resiliency teams. We also leveraged previous work done by the Washington Utilities and Transportation Commission (WUTC) and our peer utilities.	Answered in Meeting
38	2021-07-21	Current EAG member	EAG Meeting 3	CBI		We have forthcoming input from additional advisory groups that PacifiCorp organizes, the public surveys, and advocate groups and additional public meetings that will also be taken into consideration.	Answered in Meeting Notes
39	2021-07-21	Current EAG member	EAG Meeting 3	CBI	Which is the benchmark for the "starting point" to understand how to gauge what good progress looks like? Is that related to metrics in the [CEIP Process]?	Yes, we will cover the development of metrics in Meeting #4, but it will be an iterative process between CBI development and metric development.	Answered in Meeting
40	2021-07-21	Current EAG member	EAG Meeting 3	CBI	What kind of collaboration is being done on CBIs with the other utilities and the state?	PacifiCorp established a working group with the other Washington utilities (Puget Sound Energy and Avista) to share best practices, recognizing the uniqueness of the communities that PacifiCorp serves. In addition, PacifiCorp meets regularly with the UTC, as well as with other advisory groups, such as the low-income advisory group.	Answered in Meeting
41	2021-07-21	Current EAG member	EAG Meeting 3	CBI	What is the difference between access to health care and then the unknown around healthcare?	The reference to health care for improved health and well-being CBI should have been deleted prior to distribution of EAG meeting #3 materials. It is currently unknown how PacifiCorp can address the challenge of access to local health resources.	Answered in Meeting Notes
42	2021-07-21	Current EAG member	EAG Meeting 3	CBI	In regards to the first draft CBIs, the EAG provided the following comments: <ul style="list-style-type: none"> •The CBIs seem to capture everything the EAG has provided in the previous meetings, and the visual of the input on vulnerable populations and their challenges from the EAG is helpful in showing progress. •The CBIs don't necessarily reflect the effort that needs to be put in by the customer. For example, many low-income community members have challenges with their home. These customers would need to spend money on fixing their homes in order to be ready to be served by these clean energy programs. •Within the public health category, there seems to be missing a category for people with home medical equipment that need consistent power. •Some of the "unknown" category of challenges could be served by public charging stations, which might, for example, allow unhooked populations to charge cell phones to access services. This could be measured in a CBI. •The CBIs didn't necessarily capture energy use reduction cases. Is there a way to capture outlier electricity uses, for example, from faulty or inefficient equipment like furnaces in peoples' homes? Additionally, energy reduction should be considered in the context of the target customer demographics, not on a system-wide basis. •Some of the CBIs should be about customers simply needing access to money, rather than physical access to energy. COVID-19 has led to higher unemployment and lower access to money. •PacifiCorp has brought together a broad group of people within their service territory, and they are providing feedback on what they have seen "on the ground" and what is working. •Certain members clarified that their participation in this process should not be construed as endorsement of the end result. PacifiCorp acknowledged this point. •Does the PacifiCorp CETA team have the makeup and lived experiences to cover any blind spots they might have in regards to developing these CBIs? This may be an area of consideration for additional CBIs: internal to the PacifiCorp team such as the number of Spanish-speakers on the team rather than increasing translation. •It looks like there is some amount of fitting CBIs into existing programs that feels like more of the same. •It would be helpful to see more environmental benefits. •Is there room for a project-based implementation in energy efficiency, similar to what was done in Hood River in the 1980s? Crews went to neighborhoods trying to fix each house to the best of their ability. •There is some concern about the potential high cost of the implementation of this plan. If it's too expensive, how will the State of Washington consider customer rates? •It would be good for PacifiCorp to work more closely with community-based organizations to achieve some of the identified benefits. •When is a customer actually a customer in the service territory? For example, when attached to PacifiCorp's grid, it's obvious, but what about the unhooked? What about more transient populations, like those working in construction and agriculture? 	Feedback was incorporated into the next round of draft CBIs	Input incorporated
43	2021-07-21	Current EAG member	EAG Meeting 3 Feedback Survey	EAG Process	Videos or other media be used as part of the presentation process	Comment acknowledged and considered in ongoing implementation process.	Comment noted
44	2021-07-21	Current EAG member	EAG Meeting 3 Feedback Survey	EAG Process	I would welcome some additional background materials or resources that provide context for this effort and PPL's response to it. For example, the potential for a nuclear power facility in WY to replace the retiring coal plant. Positive health impacts of cleaner energy, challenges associated with renewables, etc. I think it is fair to say we (most EAG Members) have very little knowledge of these challenges and responses and little to no exposure to industry specific materials.	PacifiCorp has included "Community Outreach and Engagement" as a Utility Action in its CEIP to include the development of a webpage to host educational resources.	Comment noted
45	2021-07-21	Current EAG member	EAG Meeting 3 Feedback Survey	CBI	Please allow access to data used to make decisions on CBI and relation to decision chosen	The process and data for selecting CBIs will be presented outlined in the CEIP	Comment noted

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
46	2021-07-23	Current EAG member	Email	Educational Materials	The presentation was also helpful to give a bigger picture understanding of what we're talking about and we're excited for the forthcoming educational materials to help break down some of those acronyms used by PacifiCorp.	PacifiCorp is working on educational materials that will be available digitally on our CEIP webpage, and printed copies available upon request. These materials will be available in both English and Spanish and will include some of the common acronyms that the company uses.	Answered by Email
47	2021-07-23	Current EAG member	Email	DEI	What I was curious about was whether the brainstorm/development team reflects the demographics, languages, and lived experiences of the customers in HICs and vulnerable communities. I appreciate that the EAG is serving as one of those resources to offer that insight & lived experience and think that's a good piece of the larger puzzle; and, also I feel that without that type of representation directly within PacifiCorp's, the metrics and longer term understanding/evaluation of what those metrics mean and if they do or do not indicate success will have blind spots and inherent biases. That led to a curiosity around what PacifiCorp's larger internal organizational equity plan is?	In 2020, PacifiCorp established its Diversity, Equity, and Inclusion (DEI) Taskforce with a commitment to acknowledging, respecting, and promoting DEI for our employees, in our communities and with our stakeholders, and in the services we provide to our customers. Our first-year objectives included understanding our employee demographics, surveying employees on DEI impressions, increasing access to DEI trainings, including training on unconscious bias, and expanding our Employee Resource Groups (ERGs). PacifiCorp will continue to track employee demographics, issue an annual survey to measure year-over-year changes in employee perceptions of DEI, and continue to develop programs to foster a diverse, equitable, and inclusive workplace for all of our employees.	Answered by Email
48	2021-07-23	Current EAG member	Email	DEI	Are there metrics or goals for increasing equity, diversity and inclusion within the organization to represent the communities serviced?	PacifiCorp strives to represent the communities we serve. We achieve this by actively recruiting within our local communities, working with trusted community partners to develop or support scholarship or internship opportunities, and through our community giving that supports local scholarship and academics across our service territory. In recent years we have focused on STEAM funding in the education sector, with an emphasis on driving improvements in STEAM education and opportunity in rural and underserved communities. Over the past few years, Pacific Power and the Pacific Power Foundation are proud to have supported nearly \$90,000 in education and STEAM/STEM programs in Washington. By engaging students with rich, experiential learning opportunities, it not only brings long-term value to the students, it helps their communities thrive.	Answered by Email
49	2021-07-23	Current EAG member	Email	DEI	I also think that some of the "unknown" elements category could get addressed-- perhaps slightly indirectly-- by expanding that type of internal work because it would increase knowledge, understanding and learning around how the items in the "unknown" category are interconnected and could be addressed in different ways within the scope of PacifiCorp's work.	Comment acknowledged and considered in ongoing implementation process.	Answered by Email
50	2021-07-23	Current EAG member	Email	CBI	In terms of the CBIs proposed, I felt they need more specificity. During my reflection time, I played around with wording to see if I could get to something along the lines of what I was thinking. I just did 3 in pink and am offering that below if it's helpful. Overall though, I think more specificity will help for measurements and evaluation of success: -Increase efforts to support clean energy education (Develop, train trusted messengers, and implement a clean energy education initiative, in multiple languages.) -Improve marketing and outreach to increase awareness of energy and conservation programs (Develop culturally & linguistically responsive outreach and marketing to increase awareness of energy and conservation programs) -Expand Spanish translation services -- (Expand in-language services across written, spoken and visual services/information) "in-language" is referring to whatever the language the customer is needing-- Spanish or otherwise, and is also to [EAG Member]'s stated point that we hope the goal is not "translated services" but that there are staff/capacity who know the languages spoken and can develop materials in-language first, rather than a later translation.	Comment acknowledged and considered in ongoing implementation process.	Answered by Email
51	2021-07-23	Current EAG member	Email	Named Communities	Lastly, I am wondering if PacifiCorp's has done an overall Equity Assessment of how HICs and Vulnerable communities will be impacted by the clean energy transition plans? PacifiCorp mentioned they will be doing a feedback process to gather input more broadly from customers-- I'm curious to hear what that will look like & methods of engagement.	This is an ongoing requirement of PacifiCorp's compliance under the Clean Energy Transformation Act in Washington, and feedback through the EAG will inform our future impact/benefit assessments. More specifically, each Clean Energy Action Plan (filed along with the IRP) will contain a 10-year high-level overview of our customers and communities, current status of named communities based on the Department of Health maps and benchmarking done as part of identifying VPs, and an assessment of how the 10-year portfolio plan may impact and/or benefit customers and communities. With the CEIP, we will frame benefit/impact through the lens of near-term utility action and each action will be assessed through the lens of community impact and benefit. These processes will be iterative and will be highly informed by public participation.	Answered by Email
52	2021-07-30	Observer or Public Comment	Email	CBI	Joint Comments on Customer Benefit Indicators sent to WUTC and IOUs on behalf of: The Energy Project Front and Centered NW Energy Coalition The Washington State Office of the Attorney General, Public Counsel Unit Are the customers with email primarily the paperless billing customers?	PacifiCorp acknowledged receipt of the comments; reviewed, incorporated, and analyzed the comments; and provided an emailed response to each item on October 25, 2021	Answered by Email
53	2021-08-18	Current EAG member	EAG Meeting 4	PacifiCorp Information	Are the customers with email primarily the paperless billing customers?	Yes, approximately 75% of the customers we have email addresses for receive paperless bills.	Answered in Meeting
54	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	Did the Time of Use survey get the same volume of responses?	To date, PacifiCorp has not completed a Time of Use survey. We are still about a year away from sending out a survey on Time of Use.	Answered in Meeting
55	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	In regards to customer surveys: Was there a goal for the number of survey responses? How long was the customer survey open?	We didn't have a specific goal, but PacifiCorp would love to reach as many people as possible. We were pretty satisfied with the number of residential responses we received. We had a low number of non-residential responses. July through August. One month plus one week.	Answered in Meeting
56	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	How is the survey relevant to the CBIs? How will CBIs actually impact PacifiCorp's actions?	PacifiCorp will be addressing utility actions shortly and weighting CBIs is a key component to get there.	Answered in Meeting
57	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	For the non-residential survey, almost as many respondents ranked climate change as the #1 benefit as the #10 benefit. Is that because the term climate change is polarizing? The benefit related to the environment doesn't seem to be as polarizing.	PacifiCorp did see some polarizing responses on the survey.	Answered in Meeting
58	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	Environmental education may be a barrier to understanding climate change and clean energy. Utilities have a responsibility for broader environmental protections, such as protecting wildlife and water.	PacifiCorp agrees with this comment.	Comment noted
59	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	It is positive to see environment and climate change as key priorities for the respondents, though many are unaware of the specifics of CETA.	Resiliency ranks higher when it is not asked in the context of environment or affordability	Answered in Meeting
60	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	In reviewing the Clean Energy Transformation Act (CETA), it looks like utilities cannot increase costs more than 2% per year. Do you think there would be fewer concerns about increased costs if survey respondents knew this?	It's possible. The survey did not include this context.	Answered in Meeting
61	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	Respondents age 65+ may be more cost-sensitive or have different perspectives on the environment, and this population was overrepresented in this survey. Can the survey results be analyzed to understand these demographic differences?	Yes, PacifiCorp plans to analyze the survey data to understand demographic variability like this.	Answered in Meeting
62	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	It is positive to see representation from those under 200% of the federal poverty level. It may be interesting to compare this data against this demographic.	PacifiCorp is able to analyze data in this manner. Further analysis of the survey was completed and presented as part of EAG Meeting 5.	Answered in Meeting
63	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	Language and terminology is important, and it appears that the survey under-represents Hispanics and Latinx populations and Renters.	PacifiCorp can consider disaggregating responses from these respondents.	Answered in Meeting
64	2021-08-18	Current EAG member	EAG Meeting 4	Surveys	In looking at the business respondents, it seems agricultural businesses are under-represented. It may be a challenging time of year for businesses in this industry to dedicate time to the survey.	Comment acknowledged.	
65	2021-08-18	Current EAG member	EAG Meeting 4	CBI	Are all 9 CBI categories represented in the draft CBIs?	Yes.	Answered in Meeting
66	2021-08-18	Current EAG member	EAG Meeting 4	CBI	Why did PacifiCorp choose to change "CO2" to "Greenhouse Gases" given the different monitoring requirements in different parts of the state?	PacifiCorp is required to report GHG data in the state of Washington, and it helps to standardize the CBI to this requirement because there are strict methodologies that the utility must adhere to.	Answered in Meeting
67	2021-08-18	Current EAG member	EAG Meeting 4	CBI	Are distributed energy resources included in optimizing grid investments for energy resiliency?	They could be. It will depend on the actions that arise from this CBI.	Answered in Meeting

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable	
69	2021-08-18	Current EAG member	EAG Meeting 4	CBI	The public health examples seem to be missing a few items specific to air quality and home medical equipment with access 24/7.	PacifiCorp does not currently have generation facilities in our service territory in Washington, which is why air quality is not included. PacifiCorp will consider a CBI that could address 24/7 access to home medical equipment.	Answered in Meeting Notes	
70	2021-08-18	Current EAG member	EAG Meeting 4	CBI	The environmental and public health CBIs still seem limited. When developing infrastructure, there is a conscious choice to spend more to reduce environmental impacts. Is there a reason why your environmental CBI category is limited given the survey response priorities?	PacifiCorp understands and agrees. We are attempting to match the CBIs with the CETA Requirements and the relationship between renewables and emissions is a primary focus.	Answered in Meeting Notes	
71	2021-08-18	Current EAG member	EAG Meeting 4	CBI	How will you go about reducing wood heating in homes?	PacifiCorp is committed to using natural resources wisely and protecting the environment. Our Environmental RESPECT policy details our commitment in the areas of Responsibility, Efficiency, Stewardship, Performance, Evaluation, Communication, and Training.	Answered in Meeting Notes	
72	2021-08-18	Current EAG member	EAG Meeting 4	CETA	Based on the data, it looks like members of the community can make small changes, but perhaps corporations could have greater impact. What is the plan to ensure that they are part of these clean energy transformation discussions?	PacifiCorp is gathering more information on its Home Energy Savings program and will provide an update to the EAG.	Answered in Meeting Notes	
73	2021-08-18	Observer or Public Comment	EAG Meeting 4	Stakeholder Engagement	Has PacifiCorp received and accounted for the "JOINT COMMENTS ON CUSTOMER BENEFIT INDICATORS"?	Yes, these were reviewed and where applicable, incorporated.	Answered in Meeting	
74	2021-08-18	Current EAG member	EAG Meeting 4	Utility Actions	Improved education and awareness and reduced barriers for participation should be considered first	Comment acknowledged and considered in ongoing implementation process.	Comment noted	
75	2021-08-18	Current EAG member	EAG Meeting 4	Utility Actions	Without Commercial and Industrial customers as a part of this group, the EAG doesn't fully understand what burden the residential customers will carry in regard to cost. An EAG member expressed concern that without programs specifically targeting this customer class, the impact on CBIs will be limited.	Comment acknowledged and considered in ongoing implementation process.	Comment noted	
76	2021-08-18	Current EAG member	EAG Meeting 4	CBI	Electrical reliability and disruptions are critical in the short term given climate issues. Without the ability to manage disruptions and keep people safe, many of the other benefits are moot. Longer term, addressing GHG emissions becomes more of a focus. After these items, education and awareness are key since these will impact where investments will go and how community actions respond to issues as they emerge.	Comment acknowledged and considered in ongoing implementation process.	Comment noted	
77	2021-08-18	Current EAG member	EAG Meeting 4	CETA	Underpinning all of these is the grid infrastructure. Resilience may not be such an issue because of PacifiCorp's existing infrastructure and membership in the California electricity system [CAISO].	Comment noted	Comment noted	
78	2021-08-18	Current EAG member	EAG Meeting 4	CBI	It appears that many of the CBIs do not address a clean, equitable energy transformation. In some ways it felt forced into categories to meet external requirements.	Comment noted	Comment noted	
79	2021-08-18	Current EAG member	EAG Meeting 4	CBI	Some of the CBIs were rated lower in the activity because PacifiCorp has a good record in certain areas, but the EAG does not necessarily have the data to know this performance in named communities specifically.	Comment noted	Comment noted	
80	2021-08-18	Current EAG member	EAG Meeting 4	CBI	Ultimately, reducing the number of disconnections should be the main goal, and the other CBIs should support that. An EAG member highlighted that often, customers who might benefit most from assistance won't reach out because they do not wish to draw attention to themselves. If the system costs increase, it will affect those with the least ability to pay.	Comment noted	Comment noted	
81	2021-08-18	Current EAG member	EAG Meeting 4	Metrics	Are there leading metrics that could help PacifiCorp anticipate issues with CBI outcomes?	It is likely that there are. PacifiCorp will consider possible leading metrics.	Answered in Meeting	
82	2021-08-18	Current EAG member	EAG Meeting 4	Metrics	What is the rationale for splitting metrics/CBIs between named communities and all communities?	This is a requirement under CETA that certain CBI categories be explicitly for named communities.	Answered in Meeting	
83	2021-08-18	Current EAG member	EAG Meeting 4	Metrics	Will PacifiCorp consider handling the cascading costs associated with residential system electrification upgrades that may be necessary in houses that cannot safely transition away from wood heating?	PacifiCorp will review their current program to understand how to manage this.	Answered in Meeting	
84	2021-08-26	Current EAG member	EAG Meeting 4	CBI	Has PacifiCorp considered leading indicators in addition to lagging indicators?	Comment acknowledged and considered during the development of metrics.	Comment noted	
85	2021-08-26	Current EAG member	EAG Meeting 4	EAG Process	I wonder if in the future with the full EAG, there could be ways to split into small groups & place a for a PacifiCorp team member be in each group for part of the small group time so that EAG members could have their own direct discussion, but then also have a chance to more directly interact/ask for clarification/questions with a PacifiCorp person.	Comment acknowledged and considered in ongoing implementation process.	Comment noted	
86	2021-08-26	Current EAG member	EAG Meeting 4	Stakeholder Engagement	I would be happy to offer some examples, education or share names of specific organizations that could be critical community partners for methods in the future; it also can take a bit of time to build those partnerships so that when the time comes to do another survey 2 years from now, they are partner orgs ready to implement.	Comment acknowledged and considered in ongoing implementation process.	Comment noted	
87	2021-09-08	Observer or Public Comment	Public Meeting 1	Energy Programs	I was a bit disappointed that was not part of the survey engagement because I recall it being brought up at the very first EAG meeting by at least 2 of us. I'm glad to hear weighting of the CBIs and splicing/dicing data based on demographics is happening and hope that will account for some of the underrepresentation of the survey responses.	The annual expiration of excess credits from solar systems comes directly from Washington state law. As it comes from state law, Pacific Power has no ability to adjust the policy. In RCW 80.60.030(S), the state law says: "On March 31st of each calendar year, any remaining unused credits for kilowatt-hours accumulated during the previous year shall be granted to the electric utility, without any compensation to the customer-generator."	Answered by Email	
88	2021-09-08	Observer or Public Comment	Public Meeting 1	Energy Programs	When will new nuclear power come on line?	Pacific Power is required to continue to offer net metering as designed in the state law until there are 37 megawatts of customer sited solar energy systems interconnected to the Pacific Power system in Washington (there are 22 megawatts interconnected currently). The average size for a solar system in Washington is approximately 7.5 kW. This means that approximately 2,000 more solar systems can interconnect under the current policy.	It will come online in 2028.	Answered in Meeting
89	2021-09-08	Observer or Public Comment	Public Meeting 1	Energy Programs	Will there be smaller power producing centers for solar, wind etc.? & Considering how often nuclear power is over budget and over schedule, is there a back up plan to add more renewable energy if that doesn't make it in time?	If there is a delay, it will be adjusted as part of the planning period.	Answered in Meeting	
90	2021-09-08	Observer or Public Comment	Public Meeting 1	CETA	You may have already answered this, I lost my connection for a minute. Is this only for Washington?	CETA is for Washington State.	Answered in Meeting	
91	2021-09-08	Observer or Public Comment	Public Meeting 1	CETA	Does Pacific Power plan on making its entire operation across the other states renewable/zero emissions?	PacifiCorp's portfolio meets CETA but it will be applied across system in all our states.	Answered in Meeting	
92	2021-09-08	Observer or Public Comment	Public Meeting 1	CETA	If the WUTC rules require all of these elements to be addressed in CBIs, why is it necessary to pick one that is the most important? Why rank the statutory categories, rather than the CBIs within each category	Based on the amount of text and translation required, we limited the question to the categories for simplicity. The public survey obtained the input on each CBI from the public respondents, as well as ranking the categories. Zoom poll functionality doesn't allow for ranking at this time, unfortunately.	Answered in Meeting	

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
93	2021-09-08	Observer or Public Comment	Public Meeting 1	Stakeholder Engagement	Are the 893 survey respondents all in WA?	Yes	Answered in Meeting
94	2021-09-08	Observer or Public Comment	Public Meeting 1	Stakeholder Engagement	Was there any efforts to reach out to people who may not have access too, or know how to use technology such as email and website links?	PacifiCorp provided paper copies of the survey through the EAG Members.	Answered in Meeting
95	2021-09-08	Observer or Public Comment	Public Meeting 1	Stakeholder Engagement	Has any efforts been made Spanish media	A Spanish press release was developed and was posted in a Spanish paper.	Answered in Meeting
96	2021-09-08	Observer or Public Comment	Public Meeting 1	Stakeholder Engagement	Spanish radio can go a long way in these parts, gets the word out fast. Radio KNDA based out of Granger seems to have good reach to Spanish speaking communities.	Thank you very much for this recommendation. We will look into this option.	Answered in Meeting
97	2021-09-08	Observer or Public Comment	Public Meeting 1	Stakeholder Engagement	You may try surveying customers who are on the even pay plan. They may be a more focused group, and easy to target.	Thank you for this recommendation.	Answered in Meeting
98	2021-09-08	Observer or Public Comment	Public Meeting 1	Stakeholder Engagement	There are non profit agencies that have energy assistance programs and would probably help you survey their clients. OIC in Yakima is one.	OIC is a member of our EAG and has contributed to publicizing the survey.	Answered in Meeting
99	2021-09-08	Observer or Public Comment	Public Meeting 1	CBI	Have you talked about CBIs with the other advisory groups?	CBIs were shared with the DSM advisory group and low-income advisory group.	Answered in Meeting
100	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CBI	Concerning Low-Income Bill Assistance, did PacifiCorp consult RCW 19-405-120 as well? While CETA considers this, the specifics of this type of program are covered in the RCW reference and need to be double checked.	Following CEIP Technical Conference 1, PacifiCorp discussed this topic with WUTC staff. These discussions resulted in PacifiCorp refining its definition of Utility Action. As presented during PacifiCorp's CEIP Technical Conference 2 and EAG Meeting 6A, if a utility is required to offer a program or take an action by a different law, then that program or action will not be identified in the CEIP as a utility action, even if it is consistent with CETA. For example, the Modified Low Income Bill Assistance program supports CETA objectives, but it is not included in the CEIP as a "utility action" because it is required by a different law.	Described in CEIP Technical Conference 2, EAG Meeting 6A, and draft CEIP
101	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CETA	In regards to assessing PacifiCorp's preferred portfolio relative to CETA and more broadly, the CEIP requirements, does that only include the resource assessment?	This is focused on the what is included in the Integrated Resource Plan (IRP) and long-term resource planning relative to Washington's retail allocation.	Answered in Meeting
102	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CETA	The IRP models are only done for 20 years. You note that this analysis was extrapolated to 2045 to account for CETA requirements. Can you provide more details on that extrapolation? Was this completed in a Washington-specific Plexos Model?	In the Draft CEIP, the trend in retail load growth was extrapolated linearly to 2045. The Washington-specific analysis was done outside the model because PacifiCorp is a six-state utility, requiring it to be done externally for cost-allocation purposes. This extrapolation is no longer necessary as described in Chapter 1 regarding Figure 1.1.	Answered in Meeting
103	2021-09-14	Observer or Public Comment	CEIP Technical Meeting 1	CETA	Are the 2030 and 2045 targets PacifiCorp showing annual energy requirements?	Yes	Answered in Meeting
104	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CETA	In PacifiCorp's CETA Assessment Assumptions, there is a term "dynamic allocation method" in future years. Is this done to approximate what a future allocation method might be?	Yes, that's correct. Because the Washington Interjurisdictional Allocation Methodology (WIJAM) is set to expire in 2024, for future years we have provided a set of assumptions that allocate resources on an annual basis.	Answered in Meeting
105	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CETA	Recognizing that the draft incremental cost calculations needed for the CEIP are not finalized, could we suggest a second workshop in October prior to submitting the draft CEIP?	This makes a lot of sense and we'll schedule a second technical workshop.	Answered in Meeting
106	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CETA	In regards to the supply-side specific actions, PacifiCorp made a statement that additional actions will be coming from the CBIs and named communities. Could you clarify this statement?	All of the specific actions we propose will be viewed through the lens of the CBIs. We want to highlight that in addition to supply and demand side actions, there are a third "bucket" of actions that will drive equity actions specifically.	Answered in Meeting
107	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CETA	In regards to energy efficiency, PacifiCorp says over 202,367 MWh of energy efficiency by 2025, however, you state 156,018 MWh in 2022-2025. Where is the difference?	The 200k MWh is the adjusted energy efficiency portfolio for the purpose setting EIA 2-year target.	Answered in Meeting
108	2021-09-14	WUTC Comment	CEIP Technical Meeting 1	CETA	In regards to the 2022 All Source Request for Proposal (RFP), what is PacifiCorp's strategy for incorporating some of the CEIP-required information like incorporation of the CBIs?	As part of the RFP, we have a non-price scoring and equity questionnaire. We also intend to have the Independent Evaluator incorporate the final CBIs once determined into the draft proposal.	Answered in Meeting
109	2021-09-15	Current EAG member	EAG Meeting 5	CBI	In regards to PacifiCorp's proposed CBI Weighting, the EAG provided the following feedback: <ul style="list-style-type: none"> •Energy resilience and risk reduction was ranked higher by the EAG than the public or other advisory groups. The EAG recognized that resiliency and risk reduction is part of the work that many of their organizations do. •Low and middle-income members that don't have the ability to get loans, that rent housing, or that live in mobile or marginal homes cannot participate in many CBIs in the Energy Benefit category. •The CBI weightings are difficult to think of as actionable. •The CBI for culturally and linguistically appropriate outreach, which has a high weighting, will have a cascading effect into access that improves other CBIs, like participation in programs and energy benefits. •Some CBIs may have incentives that encourage actions that may have subsequent or related negative implications. It will be important to ensure that CBIs have overall positive outcomes for named communities. PacifiCorp's presence in Washington is largely transmission and distribution based. How does local generation, such as solar, get developed? Can costs go down with local generation because of lower transmission costs?	Comments noted	Comments noted
110	2021-09-15	Current EAG member	EAG Meeting 5	PacifiCorp Information		Any party interested in developing a renewable generator in PacifiCorp's Washington territory would need to obtain a site and complete an interconnection application with PacifiCorp in order to understand the feasibility, cost, and timing of connecting the proposed generating resource to PacifiCorp's distribution or transmission grid. The interconnection process is regulated by the Federal Energy Regulatory Commission (FERC) and the application process is laid out in PacifiCorp's Open Access Transmission Tariff (OATT) which can be found on PacifiCorp's Open Access Same-time Information System (OASIS) website. More information can also be found here: Transmission Services - PacifiCorp (https://www.pacifiCorp.com/transmission/transmission-services.html) After a party has established site control and conducted other project due diligence, they may participate in a PacifiCorp request for proposal (RFP) process and bid their project to the utility or they may request pricing and a contract as a qualified facility (QF) under the Public Utility Regulatory Policies Act (PURPA) and Washington Chapter 480-106 WAC ELECTRIC COMPANIES—PURCHASES OF ELECTRICITY FROM QUALIFYING FACILITIES. Costs are typically a function of the overall size of the project, the cost of equipment, the characteristics of the site, the cost of the engineering, labor and construction services, the cost of the interconnection and the required profit margin, and cost of capital required by the project developer and its investors. Costs of local generation may be greater than or less than resources that require transmission based on the items listed above as well as the quality of the solar resource as compared to those in other areas of PacifiCorp's territory. It's important to understand that PacifiCorp's system benefit is not only a function of cost, but also a function renewable resource availability and the value a resource brings to PacifiCorp's system. Costs to develop a new renewable asset in Washington versus other states serviced by PacifiCorp are reasonably close. The difference lies in the natural wind or solar resource available to a Washington site's asset. Therefore, given similar capital costs, new capital may be more likely to be proposed and selected in other states, such as Wyoming and Utah, where the same capital can yield a higher benefit to both the resource developer and PacifiCorp.	Answered in Meeting Notes
111	2021-09-15	Current EAG member	EAG Meeting 5	CBI	Why is there only 1 CBI selected for each CBI category?	PacifiCorp developed 22 draft CBIs. CETA requires at least 1 CBI per category, but 22 CBIs may be too ambitious for our first year. These CBIs are very interrelated. PacifiCorp recognizes that all of these CBIs are important, and even if they are not the selected with the final CBIs this year, we will still be considering them.	Answered in Meeting
112	2021-09-15	Current EAG member	EAG Meeting 5	CBI	Some CBIs, such as the clean energy education, are not the highest-weighted in the category, but are weighted higher than those in other categories. Is there room to add some of these higher-rated CBIs for consideration?	CBIs are being considered primarily in the context of the CBI category. PacifiCorp is trying to manage this by developing actions that address some of these other CBIs even if they were not weighted highest in their category.	Answered in Meeting

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
113	2021-09-15	Current EAG member	EAG Meeting 5	CBI	What is the plan now that the CBIs have been weighted? How will this be integrated with public participation?	It helps PacifiCorp identify what attributes of a given action are most important to the community. Actions have several attributes, such as a program that both reduces burdens and has an environmental benefit. PacifiCorp needs to begin tracking how well the company is meeting these objectives.	Answered in Meeting
114	2021-09-15	Current EAG member	EAG Meeting 5	Metrics	On non-energy benefits, the metric is the number of workshops. Could the metric focus on number of participants instead?	Yes, we will look at number of workshops and attendance.	Answered in Meeting
115	2021-09-15	Current EAG member	EAG Meeting 5	Metrics	The CBI metric for culturally and linguistically appropriate outreach only proposes language metrics. How is PacifiCorp going to measure culturally appropriate communications, such as with individuals on the Yakama Nation reservation? I see a link between public health and energy security. For example, disconnecting electricity could create a health issue when customers instead heat their homes with wood. Who is tracking the data related to something like this?	PacifiCorp will primarily look at this through the program design to ensure that the company is listening and engaging well with people. We welcome suggestions for metrics that might be more appropriate. PacifiCorp agrees that there is a link between public health and energy security. There will very likely be multiple CBIs affiliated with specific actions. In this instance, if we implement a program/action intended to reduce disconnections, then that program/action would very likely have beneficial outcomes for public health—as they would have access to electricity that they would not have had if they had been disconnected. This program/action would also likely have positive implications on the CBI of increased participation in company energy and efficiency programs. We are currently evaluating the CBIs affiliated with specific actions and intend to share our current thinking around the nexus between programs/actions and the CBIs in Meeting #6.	Answered in Meeting Answered in Meeting Notes
116	2021-09-15	Current EAG member	EAG Meeting 5	Metrics			
117	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	Does the supply-side include anything you're picking up from Public Utility Regulatory Policies Act (PURPA), such as local solar projects in the Yakima Valley that might not make it into the request for proposal (RFP)?	The supply-side action item list does not include PURPA, but all Washington utilities are required to take outputs from these projects. The IRP planning process does assume known PURPA contracts; this list only reflects the results of the 2020 all-source RFP and so it not comprehensive of the entire system.	Answered in Meeting
118	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	What about the cost of distribution for these remote generation facilities?	PacifiCorp's system has the capability to select and transmit from remote wind and solar resources that are best suited to serve the company's customers. Transmission and distribution costs are included in the IRP, as well as the cost to acquire the resources.	Answered in Meeting
119	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	Is there a list of Washington generation facilities? It seems like other states will see the benefit of these renewable energy generation facilities, but not Washington.	The RFP looked at Washington resources, but none of them met the threshold of least cost and least risk. The integrated nature of PacifiCorp's system means that the company can select resources and optimize across the whole system, which lowers costs for all customers. Washington currently supplies approximately 300 MW of wind and 600 MW of hydro, and Oregon supplies approximately 1,000 MW of wind and solar. In the next RFP, PacifiCorp is hoping to solicit bids from a more diverse range of suppliers, including Washington-based suppliers. Washington generation facilities can be found in CHAPTER 6 – LOAD AND RESOURCE BALANCE of the 2021 Integrated Resource Plan. Washington customers benefit from the lowest cost renewables, which PacifiCorp can import from competitively priced renewable resources in its six-state territory. Likewise, customers in PacifiCorp's other states may benefit from the low-cost hydro and wind resources that have previously been developed and constructed in Washington.	Answered in Meeting Notes
120	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	Are the [2021 All Source Procurement Results] numbers nameplate capacity?	Yes, all capacity numbers are nameplate capacity.	Answered in Meeting
121	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	Renewables don't always generate. How is PacifiCorp firming up its resource portfolio?	PacifiCorp's biennial resource planning process is designed to ensure that the company's resource portfolio can generate and transport electricity to customers when and where they need it. While variable generating resources may not always generate, PacifiCorp serves multiple climate zones, is including energy storage co-located with new renewables, has access to multiple power markets, and includes margins in our planning process to ensure adequate supply during all hours of the year.	Answered in Meeting Notes
122	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions		These are actions that can be put into place where there are load constraints on the electricity system. For example, if it's a warm day with lots of air conditioning use, demand response can incentivize customers to shift their air conditioning earlier in the day when power is more plentiful to ease demand on the grid, using thermostat programs for example.	Answered in Meeting
123	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	What are demand response resources? What is the point of diminishing returns for energy efficiency programs?	The IRP selected significant energy efficiency resources throughout the planning period. Programs to deliver that resource will remain an important part of the company's clean energy transition. Certainly, some efficiency opportunities become less cost effective over time but at the same time new technology is evolving. Efficient light bulbs used to be an efficiency upgrade and are now the baseline for residential, but there are new energy efficiency opportunities such as more efficient heat pumps and more energy efficient windows. PacifiCorp updates its Conservation Potential Assessment study every two years to incorporate these types of changes. Outputs from this study are inputs to the next Integrated Resource Planning model.	Answered in Meeting Notes
124	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	As more homes become weatherized and higher building codes are passed, at what point do you stop investing in energy efficiency and have to account for demand growth instead?	PacifiCorp runs a planning process that models technology advances by sector for the IRP. We compare this model to external models to develop a menu of potential activities and costs. This menu then "competes" things like energy efficiency against supply-side resources to identify the lowest cost options. The planning process, conservation potential assessment, and the IRP energy efficiency selections indicate that energy efficiency remains a key resource for the foreseeable future.	Answered in Meeting
125	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	An EAG member expressed concern about the differences in investment going to procuring new resources versus home improvement or demand-side programs. It is unclear if choosing "low-hanging fruit" options that are cost-effective will serve the right communities. Typical programs target quick and easy participant recruitment rather than harder to reach rural communities, for example.	Comment noted	Comment noted
126	2021-09-15	Current EAG member	EAG Meeting 5	Stakeholder Engagement	How can local communities become more participatory in system-wide investments? Can civic organizations or community groups get involved? Do enough public organizations know about PacifiCorp's resource procurement process?	PacifiCorp's resource procurement process is widely publicized and updates on the energy supply solicitation processes and selection of an independent evaluator to oversee the 2022 all-source energy supply procurement process have been included in the IRP and CEIP public participation process.	Answered in Meeting
127	2021-09-15	Current EAG member	EAG Meeting 5	EAG Process	An EAG member expressed confusion and frustration with the current EAG process—the EAG is being asked to provide comment before plans are complete.	The timeframe is compressed due to the November 1 CEIP filing deadline. PacifiCorp plans to add another EAG meeting to the schedule in November to provide the EAG members with more opportunity for input.	Answered in Meeting Notes
128	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	Is this the last time we get to provide input on utility actions?	Many of the actions come directly from the results of the IRP and PacifiCorp's Biennial Conservation Plan; CBIs will be applied to these actions. The third bucket of "other utility actions" stem directly from feedback provided by the EAG to allow for greater access to programs by Named Communities. EAG Meeting #6 in October will feature more input on actions and the CEIP.	Answered in Meeting
129	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	It seems like the focus on equity has gotten lost in some of the actions.	Comment acknowledged and considered in ongoing implementation process.	Process adjusted accordingly
130	2021-09-15	Current EAG member	EAG Meeting 5	CBI	CBIs, such as the one related to disconnections, could result in negative outcomes for some communities.	PacifiCorp is looking at data to assist in measuring the outcomes as it relates to this challenge, especially for the CBIs identified specifically for named communities.	Answered in Meeting
131	2021-09-15	Current EAG member	EAG Meeting 5	Metrics	Does PacifiCorp have metrics on the direct support the company has given to community actions where it is of no cost to the customer? This structure could be helpful for renters and low-income customers. Would that be a better metric for named communities? For example, the number of homes retrofitted, equipment installed, or dollars spent? Does PacifiCorp have the data for both utility and nonprofits that serve the area with energy efficiency programs?	In a previous EAG meeting, PacifiCorp showed the data that tracks weatherization program participation. The company maintains data for location and account participation, so this can be analyzed.	Answered in Meeting Notes
132	2021-09-15	Current EAG member	EAG Meeting 5	PacifiCorp Information		PacifiCorp only presented data for utility programs to the EAG, but PacifiCorp's annual report includes data from nonprofit programs. The most recent annual report (found at https://www.pacifiCorp.com/content/dam/pcorp/documents/en/pacifiCorp/environment/dsm/washington/2016-17_PacifiCorp_Low_Income_Weatherization_Report_WA_FINAL.pdf for program years 2016–2017) provides number of participants by weatherization implementation agency (nonprofits). Weatherization implementation agencies leverage Washington State Matchmaker funds with PacifiCorp funds to provide no cost weatherization services to program participants. PacifiCorp pays 50% of qualifying measures when Matchmaker funds are available, and 100% when Matchmaker funds are exhausted.	Answered in Meeting Notes

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
133	2021-09-15	Current EAG member	EAG Meeting 5	Utility Actions	Has PacifiCorp considered including alternative electric-powered transportation, like bicycles and scooters, to your EV program? These less expensive modes of travel can be great for named communities.	The CBI is focused on electrification, not just vehicles and we agree that forms of transportation beyond light duty vehicles are important to consider as programs are designed.	Answered in Meeting Notes
134	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Stakeholder Engagement	What does the outreach strategy look like?	The specific outreach strategy is in development; however, it will include expanded written and oral language services in Spanish.	Answered in Meeting Notes
135	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Stakeholder Engagement	How does PacifiCorp plan to differentiate between linguistically appropriate and culturally appropriate outreach?	Culturally and linguistically appropriate outreach go hand-in-hand. Culturally appropriate outreach is communication that is equitable, respectful, and understanding of diverse cultural beliefs and needs. Linguistically appropriate outreach focuses on accessibility of culturally appropriate oral and written language.	Answered in Meeting Notes
136	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Stakeholder Engagement	How will PacifiCorp reach more participants for the next public meeting?	PacifiCorp will conduct additional outreach for the next public meeting, including a customer bill insert, direct email, paid media ads, interactive voice response (IVR) recording on our customer care center phone lines, and text message notices to customers.	Answered in Meeting Notes
137	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Metrics	What kind of input can the EAG provide on metrics and when?	Metrics will be further discussed during EAG Meeting #6 and will include an opportunity for feedback.	Answered in Meeting Notes
138	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Utility Actions	How does an EV rebate program work?	This is a typical equipment rebate program. Customer would purchase a qualified EVSE product and submit documentation (proof of purchase, application, etc.) to Pacific Power. Pacific Power would approve the purchase and issue an incentive check to the customer. While this is one concept under consideration, the company will consider program design details and other EV program concepts in the context of equitable access to these programs.	Answered in Meeting Notes
139	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Utility Actions	How will you support the reduction of wood burning?	PacifiCorp would like to increase incentives (Home Energy Savings program for all customers, it does not have an income qualification) for heat pumps starting in 2022. We have proposed 2022 changes to Schedule 114 (low-income weatherization) to increase funds available for repairs and permit installation of electric heating in cases where the home is being heated by space heaters.	Answered in Meeting Notes
140	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Utility Actions	Will specific renter/owner programs be developed to serve the needs to tenants?	PacifiCorp will continue the direct install of efficient lighting in multi-family units and increase incentives for multi-family window replacement beginning in 2022.	Answered in Meeting Notes
141	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Utility Actions	Could batteries play a role in preventing the impacts of disconnection?	If the disconnection is a reliability issue where the distribution line loses power then storage can help prevent individual customer impacts as the charge in the battery will delay the impacts of the power outage for those specific customers that have the storage facility. If the disconnection is related to nonpayment or something of that nature, then the battery will be able to delay the impacts of the disconnection for one cycle of the battery, but then will have no value as there are no means to replenish the power within the battery.	Answered in Meeting Notes
142	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Stakeholder Engagement	How is the progress of this work going to be shared?	Educational materials and content will be available on Pacific Power's website. Updates will be shared during EAG meetings, as well as through direct outreach to customers, EAG members, advisory groups, and community agencies.	Answered in Meeting Notes
143	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Stakeholder Engagement	Who are the targets for educational programs?	Targets for the educational content and materials are both adults and children. Materials will be available in English and Spanish.	Answered in Meeting Notes
144	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Stakeholder Engagement	Making a website for educational material has too many barriers for too many people for it to be broadly effective.	While the content will be available on the Pacific Power website, materials will also be available to be printed and shipped to those that are interested.	Answered in Meeting Notes
145	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Stakeholder Engagement	Consider efforts and methods for children's education.	Pacific Power offers a Wattsmart Schools education program in Washington through the National Energy Foundation. The program is designed to develop a culture of energy efficiency among teachers, students, and families. This program includes a presentation with educational video components as well as hands-on, group activities for 4th and 5th grade students. Students are also sent home with a Home Energy Worksheet in English and Spanish to explore energy use in their homes. In 2020 the program reached 3,399 students and was presented in 47 schools in Washington.	Answered in Meeting Notes
146	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Utility Actions	How are large industrial power users contributing to the solution?	Industrial customer energy efficiency opportunities are included in Conservation Potential Assessment. They are eligible to participate in the Wattsmart Business energy efficiency program (and soon, Demand response programs). Large customers are major contributors to the system benefit charge that funds energy efficiency (and soon, DR) programs.	Answered in Meeting Notes
147	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	PacifiCorp Information	Will there be future investment maps available?	With respect to planning, the biennial IRP selects an optimized mix of resource types and locations to serve our customers in the least cost and least risk way. No maps were developed in the recently completed 2021 IRP, but instead a table was developed showing the type and general location of proxy resources chosen for the preferred portfolio.	Answered in Meeting Notes
148	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	PacifiCorp Information	Where do direct efficiencies fall into the utility actions?	PacifiCorp needed additional clarity/direction on this question and was unable to answer it.	Described in Meeting Notes
149	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	PacifiCorp Information	In the next RFP, consider local community benefits as criteria in evaluating bids.	PacifiCorp will consider this for conservation and demand response resources. Washington CETA rules require PacifiCorp to evaluate all RFP bids based on the community benefit indicators develop in partnership with the EAG and reported in the CEIP.	Answered in Meeting Notes
150	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	CETA	How will CETA directly affect my community?	CETA requires utilities, stakeholders, and state agencies to work together. The objective of CETA is to ensure that all communities, primarily highly-impacted communities and vulnerable populations, are equitably benefitting from the transformation to 100% clean energy through least cost resources, demand response, and other programs. Through PacifiCorp's newly formed EAG, public meetings and outreach, communities now have many opportunities and avenues to have a seat at the table and to have their voices heard as PacifiCorp develops its plan. PacifiCorp greatly welcomes this opportunity for our customers and communities to share their perspectives and new ideas for a cleaner energy future.	Answered in Meeting Notes
151	2021-09-15	Current EAG member	EAG Meeting 5 Whiteboard Session	Utility Actions	Will you create data for examining the difference between low income and other demand-side usage patterns geographically to ensure that you are serving the most needed areas first?	Yes. PacifiCorp has accumulated participation data for low-income weatherization, low-income bill assistance, and demand-side programs. PacifiCorp has also developed its mapping capabilities to understand program participation within highly impacted communities.	Answered in Meeting Notes
152	2021-09-15	Observer or Public Comment	EAG Meeting 5	EAG Process	Why doesn't the EAG get to listen to public comment?	We create public facing notes to capture the information shared, and the EAG has access to that. It's a function of time efficiency to use this time to engage with you while the EAG is in a breakout.	Answered in Meeting
153	2021-09-15	Observer or Public Comment	EAG Meeting 5	Utility Actions	On slide 21 of the EAG Meeting 5 Slide Deck, those resources will be considered part of the base, since they were in the 2020 RFP, correct? The incremental renewable energy to comply with CETA will derive from the 2022 RFP, correct?	The incremental resources will move PacifiCorp towards our future targets.	Answered in Meeting
154	2021-09-15	Observer or Public Comment	EAG Meeting 5	CETA	Would any of those resources from slide 21 of the EAG Meeting 5 Slide Deck be acquired without CETA?	Yes, they would have been acquired. They were the least cost resources. The preferred portfolio was developed with least cost, least risk. They were not evaluated by CETA, but we did an analysis afterwards to make sure that the preferred portfolio aligned with CETA. The portfolio was not designed for CETA targets, but it is aligned.	Answered in Meeting
155	2021-09-15	Observer or Public Comment	EAG Meeting 5	Utility Actions	On slide 17 of the EAG Meeting 5 Slide Deck, how much of the 550 MW of new DR are already committed, per footnote? Can you clarify the difference between slides 17 and 21 about how much DR is targeted for Washington—62MW versus 78MW?	The difference is a matter of timing. The action plan goes through 2024. 274 MW is the new DR coming online. That is in addition to get to the 550 MW.	Answered in Meeting
156	2021-09-15	Observer or Public Comment	EAG Meeting 5	PacifiCorp Information	Regarding slide 18 [of the EAG Meeting 5 Slide Deck], which shows emissions reductions, the statute requires that clean energy be used to serve retail load. Where is the chart that shows increasing use of clean energy to meet 2030 and 2045 standards?	Executive summary and Chapter 9 in the IRP touch on this. The website has information on the Technical Workshops that we are holding, so it includes details of the assumptions made there. The IRP is only through 2040, but we are on track to meet 100% clean energy in 2045.	Answered in Meeting
157	2021-09-15	Observer or Public Comment	EAG Meeting 5	Metrics	For metrics, it seems like it would be valuable to track multiple values—both the percentage change and the total amount, for example.	Comment noted	Comment noted

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
158	2021-09-15	Observer or Public Comment	EAG Meeting 5	Metrics	We don't think the metric about grants from the Pacific Power Foundation count as utility actions since they are from the foundation, not the utility.	In consideration of this comment and further discussions with WUTC staff, grants from the Pacific Power Foundation was removed as a Utility Action.	Process adjusted accordingly
159	2021-09-15	Current EAG member	EAG Meeting 5 Feedback Survey	CETA	Some of the EAG are frustrated that the CEIP seems to be coming down to how existing programs can fit the bill for advancing the CETA and equity concerns while lacking solutions for those most disadvantaged. For me, I'm certain the intent of CETA/CEIP is not to reinvent the wheel, but it seems there could be additional focus on programs that really do significantly positively impact the named communities.	In recognition of this comment in EAG Meeting 5, PacifiCorp focused on making the connection between Utility Actions, CBIs, and metrics clearer during EAG Meeting 6A.	Comment noted
160	2021-10-06	Observer or Public Comment	Public Meeting 2	Named Communities	What is your definition of equity	We asked our EAG to weigh in and modify our initial equity definition, so our definition for this work with their input is: "Equity is the fair and just treatment of people, with the recognition that individuals and communities have vastly different access to opportunities and advancement based on race, renter status, employment status, income, ethnicity, gender, immigration status, and sexual orientation. Achieving equity may require providing individuals and communities with different resources, systems, processes, access and adjustments to programs, and support to ensure they have equal opportunities to be successful."	Answered in Meeting
161	2021-10-06	Observer or Public Comment	Public Meeting 2	PacifiCorp Information	How many public attendees are there participating tonight?	PacifiCorp had 12 public attendees in the meeting at the time the question was asked.	Answered in Meeting
162	2021-10-06	Observer or Public Comment	Public Meeting 2	Energy Programs	What is the carbon footprint of the mining, processing, manufacturing, delivery, installation and disposal of solar PV and wind turbines? How is that factored into the 'clean' energy calculations?	There are long term resource planning efforts and different resource options for wind and solar. The carbon footprint metrics we have do not look at emissions from the production of the equipment itself; they only calculate system-level emissions of the portfolio of resources and equipment being analyzed based on a model's dispatch of the resources. Proxy cost assumptions include demolition costs for solar and wind.	Answered in Meeting
163	2021-10-06	Observer or Public Comment	Public Meeting 2	CETA	Is nuclear power an eligible resource for CETA requirements?	Yes, nuclear power is included in the non-emitting resource category.	Answered in Meeting
164	2021-10-06	Observer or Public Comment	Public Meeting 2	Named Communities	Are renters one of the vulnerable populations?	Yes, based on input from our EAG, PacifiCorp added renters to the vulnerable populations list.	Answered in Meeting
165	2021-10-06	Observer or Public Comment	Public Meeting 2	Educational Materials	Would you explain the difference between MW and MWh? How do wind and solar capacity factors impact your forecasts?	MW refers to installed capacity, MWh refers to generation. The capacity factor varies by resource and location. This is the link to the Supply-Side Resource Table with details on resources assessed in the 2021 IRP: https://www.pacifiCorp.com/content/dam/pcorp/documents/en/pacifiCorp/energy/integrated-resource-plan/2021-1-11%20Supply-Side%20Resource%20Table.pdf . You can also see Chapters 6 and 7 of our 2021 IRP for more information.	Answered in Meeting
166	2021-10-06	Observer or Public Comment	Public Meeting 2	Utility Actions	WAC 480-100-640(5) and (6) requires detailed information on specific actions, not just general programs. When will PacifiCorp provide the data required by this rule?	We are working through this process. We're going to publish our draft CEIP on November 1, which will have that information included. We will also be presenting specifics in our EAG Meeting #6 on October 20, which is open to the public to observe. The primary focus of that meeting will be utility actions and the CEIP. The slides from that meeting will be posted on our website along with public notes.	Answered in Meeting
167	2021-10-06	Observer or Public Comment	Public Meeting 2	PacifiCorp Information	Did you answer how many public attendees are participating in this webinar?	At the time the question was asked, 18 public attendees had joined the webinar.	Answered in Meeting
168	2021-10-06	Observer or Public Comment	Public Meeting 2	Metrics	To reduce customer disconnections, have you looked into prepay being installed at the meter? Consumers learn about their usage as well through this tool.	PacifiCorp hasn't looked at prepay due to the cost of installing the technology and administration. It might be something down the road that the company could look at. With our energy usage reports, customers can gain insights into patterns of how they use energy and when they use most energy. At this point in time, the long-term focus using the advance metering infrastructure (AMI)—also called "smart"—meter, which provides customer nearly real-time information about energy usage.	Answered in Meeting
169	2021-10-06	Observer or Public Comment	Public Meeting 2	PacifiCorp Information	How is carbon neutrality being measured for PacifiCorp? How are offsets being handled?	By 2045, 100% of our Washington retail allocation of electricity will be served by clean energy—that's something we can track with our resource mix. From a planning standpoint, like in the IRP, we evaluate system-level emissions based on resource mix. That's an output of our modeling based on the dispatch model in our portfolio.	Answered in Meeting
170	2021-10-06	Observer or Public Comment	Public Meeting 2	PacifiCorp Information	I'm interested in the interim 2030 portfolio.	In 2030, there will be Washington-specific resources (wind, solar, storage co-located with solar) to achieve carbon targets. But that is outside of the timeline of the action plan window for the 2021 IRP and we will continue to evaluate in subsequent IRPs.	Answered in Meeting
171	2021-10-06	Observer or Public Comment	Public Meeting 2	CETA	At what point will you know how this process will affect rates?	There is a component of the CEIP that will look at the incremental costs of achieving progress towards clean energy in Washington through an incremental cost analysis. This will be part of the work we're doing and will be included in the upcoming draft CEIP on November 1. Relative to long-term resource planning, when we're talking about 2,000 MW of additional solar and storage, those are based on proxy resource cost and performance assumptions. We don't know the exact costs (due to uncertainty in timing, location, etc.). In terms of rate impacts, the resource planning doesn't evaluate this, partly because it's based on proxy and partly because it's based on other factors (company cost and/or savings) that may be applicable at the time.	Answered in Meeting
172	2021-10-06	Observer or Public Comment	Public Meeting 2	PacifiCorp Information	How will tax increases proposed by the Biden administration impact rates?	If federal tax policy were to change for solar or wind for example, that would be something PacifiCorp would look at in our planning assumptions and update or possibly run scenarios or sensitivities as needed.	Answered in Meeting
173	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	CETA	In the incremental cost calculation, how was the social cost of carbon accounted for beyond Washington Resources?	The incremental costs are of dispatch addition, and applies to non-WA resources.	Answered in Meeting
174	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	CETA	How is the social cost of carbon integrated into the CEIP?	PacifiCorp ran a number of models under a variety of scenarios including those with the social cost of carbon. A non-CETA model was also completed in order to generate the incremental cost calculations.	Answered in Meeting
175	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	CETA	Can PacifiCorp elaborate on the approach it is using to document non-modeled CETA costs? When do you anticipate this being wrapped up?	One component of incremental cost is the comparative portfolio, while the second is actual costs incurred that do not show up in the models. PacifiCorp is still working to identify all of these costs and developing an internal tracking procedure so this is still in flux. We'll have the draft done by November 1, but there may still be some work through the January 1, 2022 filing date.	Answered in Meeting
176	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	CETA	Can PacifiCorp comment on how this cost is apportioned when only part of the generator output is procured?	PacifiCorp cannot acquire only a portion of a facility, so there is not any prorating done in terms of the incremental cost.	Answered in Meeting
177	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	CETA	Washington only represents a small portion of PacifiCorp's customer base. How are you ensuring the cost is not high relative to the rest of your portfolio?	The CETA portfolio is not very different from the non-CETA portfolio selection.	Answered in Meeting
178	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	CETA	In regards to the example incremental cost calculation, does that factor in the social cost of greenhouse gases as a cost adder?	No, at the moment, PacifiCorp does not have high confidence in the results of the model while including the social cost of greenhouse gas and will likely file for a waiver for this requirement.	Answered in Meeting
179	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	CETA	In regards to the example incremental cost calculation, are the scenarios being compared without the social cost of greenhouse gases then, given the modeling challenges? We feel the purpose of this is to ensure energy efficiency and demand-side management are considered adequately.	At the moment, PacifiCorp is planning on using an alternative portfolio that closely matches the portfolio that includes the social cost of greenhouse gas because the primary costs of energy efficiency and demand-side management in both scenarios are very close.	Answered in Meeting
180	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	CETA	Can PacifiCorp elaborate on how it arrived to the conclusions that energy efficiency and demand-side management have very little difference in the scenarios with and without the social cost of greenhouse gases?	In regards to CETA compliance and Washington-allocated resources, very little addition is needed to meet the requirements in either scenario.	Answered in Meeting
181	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	CBI	Now that PacifiCorp has developed CBIs and Metrics, can you elaborate on the directionality of each of these and how you apply those to proposed resources and programs?	PacifiCorp is still exploring this process.	Answered in Meeting
182	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	PacifiCorp Information	In the slides related to new resource additions, what do the asterisks mean?	These indicate these resources are being developed as build-transfer agreements rather than as Power Purchase Agreements.	Answered in Meeting
183	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	CETA	What is the difference between the resource additions indicated in this meeting and the Clean Energy Implementation Plan work?	These resources are all CEIP-compliant and support the CEIP.	Answered in Meeting
184	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	Utility Actions	In regards to the 2022 All Source Request for Proposal, where are the renewable energy actions included given the RFP is outside the CEIP time period?	The IRP determines the optimum portfolio, based on certain assumptions.	Answered in Meeting

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
185	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	CBI	Can you elaborate on the considerations of CBIs on equity considerations in the 2022 All Source Request for Proposal? It appears that the CBIs may be included more as a post-processing step.	This is challenging because the IRP is across a 6-state system. In regards to Washington, PacifiCorp is considering choices between resources.	Answered in Meeting
186	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	Utility Actions	In regards to demand response, can PacifiCorp comment whether the renewable energy capacity amount is the same as the renewable energy target for its utility actions?	The demand response resources were included earlier in the 2021 All-source Request for Proposal, and only part of that is available for the CEIP implementation.	Answered in Meeting
187	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	Energy Programs	Did the numbers in the energy efficiency models differ from the Biennial Conservation Plan?	They are based on the same forecasts to align very closely, but will be just a little bit higher.	Answered in Meeting
188	2021-10-19	WUTC Comment	CEIP Technical Meeting 2	CBI	Is the intent to track energy efficiency actions back to named communities or just Highly-Impacted Communities?	The focus is Highly-Impacted Communities, and we are working on tracking other vulnerable populations.	Answered in Meeting
189	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	CBI	Will you be tracking some CBIs for all communities?	Yes, some CBIs are applicable to all communities	Answered in Meeting
190	2021-10-19	Observer or Public Comment	CEIP Technical Meeting 2	Utility Actions	For each specific action, you need to report in a tabular form and the metrics related if they are affected by resource efficiency, and I want to confirm that we should expect that in the draft.	Comment noted	Comment noted
191	2021-10-20	Current EAG member	EAG Meeting 6	Metrics	In regards to PacifiCorp's proposed metrics, can you please talk about the metric for headcount of staff supporting Washington-focused program delivery?	This metric is intended to measure the staff that are directly involved in the delivery of our programs in Washington that are women, minority, or disadvantaged. This definition was based on a Washington State certification (OMWBE). This metric includes internal staff and those organizations contracting with PacifiCorp to deliver programs.	Answered in Meeting
192	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	How do the outlined energy efficiency goals compare to where we are now?	To meet these energy efficiency (EE) goals, PacifiCorp will have to increase EE programs from where they are today. These targets were generated by looking at the social cost of carbon alongside non-energy benefits over a ten-year period. We extrapolated what would need to happen in the next 2 years to be on track.	Answered in Meeting
193	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	How are low-income weatherization programs being handled for multi-family dwellings?	For multi-family homes, 65% of the home needs to be income-qualified for the apartment or units to be eligible for the weatherization program. That percentage could be changed if there is a better threshold for eligibility	Answered in Meeting
194	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	When extreme events cause homes to be damaged, as part of the repair process can PacifiCorp leverage economies of scale to weatherize a bunch of homes at once?	PacifiCorp and their community partners would explore economies of scale in service delivery after an extreme event impacting homes. How that would look depends on the type and extent of damage and other resources (such as FEMA) that are available.	Answered in Meeting Notes
195	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	How do the weatherization program and the bill assistance interact? Can one be leveraged to increase participation in the other?	There is a close partnership between the implementers of bill assistance and weatherization. PacifiCorp partners with three community action agencies—Blue Mountain Action Council (BMAC) serving Columbia, Garfield, and Walla Walla counties; Northwest Community Action Center (NCAC) serving Yakima County (South); and OIC of Washington service Yakima County (North)—to deliver the company's Low Income Bill Assistance (LIBA) program. These community action agencies deliver Low Income Home Energy Assistance Program (LIHEAP) and weatherization services, among other services, to income qualifying households in their local communities.	Answered in Meeting Notes
196	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	Will the electric vehicle (EV) grant program be available to landlords that serve renters?	PacifiCorp hasn't gotten to this level of detail yet, but we anticipate working with the EAG on these kinds of questions.	Answered in Meeting
197	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	Can you comment on how the use of renewable resources outside of Washington are applicable to this law? Will they be double counted in the states where the resource is located?	CETA requires PacifiCorp to meet the clean energy goals to become carbon neutral. CETA does not require that the renewable resources are built in a specific location or state. Renewable resources generate renewable energy credits (RECs) which are tracked in the Western Renewable Energy Generation Information System (WREGIS). There are finite number of RECs which can be used to substantiate renewable claims and demonstrate compliance with policies such as CETA. RECs are allocated to PacifiCorp states based on their cost allocation methodology. Under this principle each state can get a share of a renewable resource inside and outside the state without double counting.	Answered in Meeting Notes
198	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	Is there a way to close the urban/rural divide on how the EV grant program is implemented? Some rural communities do not have the infrastructure to support EVs.	These topics and concerns will be considered as the EV grant program is developed.	Answered in Meeting Notes
199	2021-10-20	Current EAG member	EAG Meeting 6	Utility Actions	The energy efficiency programs should target commercial customers who use the most energy. PacifiCorp's Question: Which of the actions and/or metrics presented today do you think will be most impactful for your community?	Comments acknowledged and considered in ongoing implementation process	Comments noted
200	2021-10-20	Current EAG member	EAG Meeting 6	EAG Process	Responses: -Bill assistance programs for residential households experiencing high energy burden. -Weatherization programs will be very helpful to create healthier living conditions, especially in the winter. These programs will have a ripple effect. -Energy efficiency to lower bills and make energy affordable is significant as we move toward cleaner sources of energy. PacifiCorp's Question: Based on your experience, what advice do you have for PacifiCorp as they implement these actions and track progress on CBIs?	Comments acknowledged and considered in ongoing implementation process	Comments noted
201	2021-10-20	Current EAG member	EAG Meeting 6	EAG Process	Responses: -Keep in mind the communities that we are looking to benefit with this work. -Ensure access to proper information for our Spanish-speaking population on the pros and cons of clean energy implementation. -Access points could make it easier to provide feedback, access customers at regional to small pay points. -Capitalize on opportunities for feedback. An opportunity to do so is with the home energy efficiency and weatherization programs. Make sure customers are realizing the benefits we are targeting, such as lower bills and more comfortable/healthier living spaces. -Continue strategizing ways to connect with people. Many of these communities don't have access to the internet and other methods of communication. -There is a shortage of electricians, so PacifiCorp will need to think beyond the traditional means of implementing things like the Wattsmart program. -Identify opportunities to synergize what you're doing with other programs. -Think about local partners for workshop facilitation and communication directly with communities. -Keep the ripple effect in mind. Some of these types of houses and communities are hard to access, but once they do, they can be forces for positive change. For example, with multi-family households, accessing 1 or 2 can cause a ripple effect. -Customer engagement is crucial through every step of the process. They need to be aware of programs, how to access them, and the resources available from beginning to end. -Some benefits we are targeting may be secondary to those who are scraping to save money. For example, air quality is secondary to folks who are using wood for home heating to save money. -Fixed-income homeowners often get left out of these solutions.	Comments acknowledged and considered in ongoing implementation process	Comments noted
202	2021-10-20	Current EAG member	EAG Meeting 6	EAG Process	In regards to an email note an EAG Member received: Is the rate increase that we were notified of by email related to this work?	What we've just presented are forecasted costs, and those will be subjected to review before they result in actual rate changes. The rate change that you're referencing does not have to do with this work.	Answered in Meeting

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
203	2021-10-20	Current EAG member	EAG Meeting 6	EAG Process	<p>The EAG Members offered the following suggests to what might make it easier for their communities to provide feedback on the Clean Energy Implementation Plan:</p> <ul style="list-style-type: none"> •Emphasize the importance of providing feedback on the CEIP in all communications •Hard copies of the documents would be useful for those who do not have internet access •Public meetings have made it easier to provide feedback •Media, like radio announcements, local tv, and social media, to encourage community members to complete surveys and access programs •Make things transparent and provide them in different languages in different media platforms •Social media may appeal to different ages and demographics •Include a link in bill payments to enable input sharing •Focus groups may be helpful for folks in communities to digest and react to the information •Offer a financial incentive to provide feedback 	Comments acknowledged and considered in ongoing implementation process	Comments noted
204	2021-09-01	Observer or Public Comment	CEIP Mailbox	CEIP	<p>I don't like you don't have a Local office so I can talk to a representative in person . Going clean energy is good if it doesn't raise any of our bills . With WA. Having the Largest Dam in the United States our power bill's should be one of the Lowest anywhere in the US ! Thank you for asking for public input on this matter. I would like to put in a few requests on the implementation of alternate energy sources. First off if any solar or wind generators or similar alternatives to energy are on residential property then those properties should be allowed to use these items in a power outage. In California there were companies that did the no cost solar systems for residents and when the power grid goes out the customers were left with no power. Not even on a sunny day and solar panels all over the roof, this is a stupid backwards step if this is how ppl would implement residential solar systems. There are other companies and businesses who would love to be a mini solar farm and have their roof (already rated for extra weight) or parking lots covered with solar panels. Especially if they could rent the space to ppl for a discount on their power bill instead of a rent check. Their building is shaded from the hot sun and or their customers have shaded parking spots so they don't come out to a 150" car after shopping. A bonus would be for residential solar spots to be able to have mini power grids some how that when storm takes out power lines or similar event then people with solar panels could charge their own house battery backups and then when those are 80% full or so then the solar panels go to the broken grid and charge the neighboring houses batteries. Lots of switches in this set up but future idea maybe. Or a solar farm that one can trailer their house battery to and charge it up after a power grid failure. Residents like me who have an easy 24'x24' roof space for solar panels and room for many more but don't need that many panels are kinda out of luck. I have low power needs and with led and more energy efficient appliances like natural gas heat, dryer and oven the power bill is to low for allowance of solar panels on my property and receiving a money back on my power bill would result in a negative bill during good sunny days. But this abundant space should not be a barrier any more and there should be some way to figure out a way to still utilize the wasted space like this and not rip off the customers by not paying them for the solar energy space used. Same for wind generators. I have a windmill to be installed and will make it fully functioning but instead of pumping water it could pump electricity into the grid or neighboring house battery backups. Could use all those negative bills I could get from solar energy to pay ppl for battery upkeep and replacements or services so that the residents don't have to mess with batteries and maintaining them or refurbishing them. If residents paid the same amount per month but got solar panels and house battery backup system with free maintenance for life then I would go for that type of setup. Still would need a system like energy bills increase on less energy efficient appliances so that residents still want to go out and buy better appliances to reduce their energy bill. Homes with extra solar panels vs what they need would be a bonus too on decreasing their energy bill that would have some sort of monthly fee for battery and solar system upkeep. Putting solar on the side walls too as shade for pedestrians would be great. Even out on parks walkways and the Bennington lake paths or road way for bikers and walkers. Where else would shade be welcome?</p>	Comment acknowledged and considered in ongoing implementation process.	Email
205	2021-09-03	Observer or Public Comment	CEIP Mailbox	CEIP	<p>Residents like me who have an easy 24'x24' roof space for solar panels and room for many more but don't need that many panels are kinda out of luck. I have low power needs and with led and more energy efficient appliances like natural gas heat, dryer and oven the power bill is to low for allowance of solar panels on my property and receiving a money back on my power bill would result in a negative bill during good sunny days. But this abundant space should not be a barrier any more and there should be some way to figure out a way to still utilize the wasted space like this and not rip off the customers by not paying them for the solar energy space used. Same for wind generators. I have a windmill to be installed and will make it fully functioning but instead of pumping water it could pump electricity into the grid or neighboring house battery backups. Could use all those negative bills I could get from solar energy to pay ppl for battery upkeep and replacements or services so that the residents don't have to mess with batteries and maintaining them or refurbishing them. If residents paid the same amount per month but got solar panels and house battery backup system with free maintenance for life then I would go for that type of setup. Still would need a system like energy bills increase on less energy efficient appliances so that residents still want to go out and buy better appliances to reduce their energy bill. Homes with extra solar panels vs what they need would be a bonus too on decreasing their energy bill that would have some sort of monthly fee for battery and solar system upkeep. Putting solar on the side walls too as shade for pedestrians would be great. Even out on parks walkways and the Bennington lake paths or road way for bikers and walkers. Where else would shade be welcome?</p>	<p>With regards to the ability of renewable generators to provide increased reliability for a customer: As you note, renewable generating resources at this point are generally installed in a way, that if the distribution grid in the area goes offline, the renewable energy system also deenergizes. This design feature is included to prevent safety risks for the customer and the line men attempting to restore service to the area. Currently, customers can install renewable energy systems that are designed to safely "island" (disconnect from the surrounding grid) during grid outages and continue to provide power to the customer. These systems are more complex and have additional equipment and affiliated costs associated with them. Typically, these systems have a storage component, a transfer switch that allows the islanding, and a control system that will balance the output from the solar and the storage with the load on the site. A customer interested in this additional protection should contact a local renewable energy installation company and discuss the cost and complexity of adding that feature.</p> <p>In answer to the second issue regarding rate structures that would compensate customers that produce energy above and beyond their onsite needs: This is a complex story that hits at the intersection of federal and state energy law. Under the federal Public Utility Regulatory Policies Act, any person can ask the utility to purchase energy from a renewable energy facility by becoming a qualifying facility ("QF"). These renewable energy developers are compensated at avoided cost - basically the value of the energy to the system.</p> <p>For most customers interested in installing generation, their goal isn't to earn money for generating energy, it is simply to offset their load and reduce their personal bills. In that case, there is a program called net metering that is authorized by state law. That program basically takes the generation from the facility and nets any energy that is provided to the grid with energy the customer takes from the grid. An individual facility must choose its path either as a QF under federal law or as a net metering facility under state law. For most customers net metering is the most economical way to install renewable generation, as the customer is offsetting energy at the full retail rate rather than being paid the avoided cost as a QF would. While this framework may change over time, at this point the legal system only provides these two options.</p>	Email
206	2021-10-02	Observer or Public Comment	CEIP Mailbox	CEIP	<p>Thank you for providing a way to comment. So glad that I am actually able to respond to your request for comment in the manner that I want to. I tried to respond through the "survey". I did not want to be forced to pick responses that did not reflect my thinking but which would fit your narrative so you can get kudos from the "woke".</p> <p>Climate change is a reality. It is important to consider it when planning. I would hope that the utility plans to use as many sources to provide my electricity focusing on the most affordable, most reliable and the most cost effective. Bing held hostage by the environmentalists, we see acres of wood burn up. The wood could have been used to keep building costs lower and provide heat in the winter. Having lived in Texas, my family lived through this past winter with the debacle of the windmills and not being able to access resources (due to federal government oversite) that the utility had available. Fortunately, they had generators and were able to keep water pipes from freezing and parts of their homes warm when the temperatures plummeted.</p> <p>I use your utility – a "public" utility because it is what is offered in my city/community. My wishes are for RELIABLE electric service when I need it. I want to be able to heat or cool when it is necessary. My thermostat for a/c is set at maximum 70 degrees summer. I have an electric water heater. My bill is manageable even with extra family and company during the holidays. I have had electric heat pumps. My experience in cold weather (California, Virginia, Michigan, Indiana, Kentucky and Washington) is the electric heat strips have to run full time to provide heat which is a really an inefficient way to heat and causes a high demand on resources.</p>	Comment acknowledged and considered in ongoing implementation process.	Email

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
207	2021-10-03 & 2021-12-20	Observer or Public Comment	CEIP Mailbox	PacifiCorp Information	<p>Public comment submitted on 10/3/2021: We have taken the Grand Coulee Dam tour twice (2018 and 2019). Both times, they explained that most of the electricity that this dam is capable of generating is NOT being transmitted. In other words, only a fraction of the electricity that this dam is fully equipped to generate is actually supplied to the "grid" while the rest of it remains idle. This apparently has nothing to do with equipment failures or maintenance. This is what the tour guides were saying. Why is this so? If this dam would be allowed to produce and supply all of the electricity that it is capable of, then wouldn't that preclude the necessity of constructing so many of these new and expensive "green energy" suppliers?</p> <p>Public comment submitted on 12/20/2021: Thank you for your reply, but it still did not address my question. Your answer nicely laid out the strategic theory (or theoretic strategy) behind having multiple sources of electricity generation and was therefore a decent but partial answer. It did NOT address the demand-side necessity of building, AT GREAT EXPENSE, more super-expensive energy generators (or whatever the generic phrase is for anything that generates electricity) that might just not be necessary given that Grand Coulee & the other dams are only supplying a fraction of the energy that they are fully capable of. Why build (and make us pay for) more energy generators than we actually need when the dams themselves are already more-than capable of meeting the demand for electricity with voltage to spare?</p> <p>I agree that we should try get a little ahead (and stay ahead) of projected future demand, but I HATE seeing these green energy generators (dams) only supplying a fraction of their full potential while the public is being told of the necessity for building more (which sounds like a big lie to me). Couple that with the trend in recent years of an increasing number of residents and businesses installing their own solar panels and storage batteries which greatly reduce their dependency on "the grid." The PNW appears to be overflowing with electricity.</p> <p>When I lived Kettle Falls in the 1990s, every year we would see FDR Lake start dropping during mid-winter in anticipation of the annual spring runoff. The Lake would always return to and stay at its normal level during the summer and into the fall, even during the drought year of 1994. The hydrologists had it all calculated, and everything worked out just fine with no alarms being sounded about a need for more generators. I do not recall seeing a lot of wind turbine construction in those days.</p> <p>I originally sent my comment thinking it would be recorded and considered along with all other public comments that were originally requested in response to PacifiCorp's plans for the future. Based on your answer, which sounded as if you were trying to correct me rather than taking my comments into consideration, it sounds as though PC will plow forward with its plans REGARDLESS of the public feedback that you were originally soliciting.</p>	<p>PacifiCorp reply on 12/10/2021: In general for hydro projects with larger reservoirs/lakes, the time and extent of hydro generation is based on customer and grid requirements at any moment in time. The reservoir is essentially like a fuel tank, the supply limited to annual or season inflow. Use of that fuel is often directed to its greatest value typically based on customer demand and availability/cost of other generation sources. For example, during the spring time when the wind is consistently blowing, we can meet customer demand through our wind generation fleet and reduce hydro generation to store spring runoff into the reservoirs. In the summer and fall, we can then use that water and hydro generation if the wind is not blowing. Wind, hydro and solar generation are all limited by what nature provides you, hydro is the only one that can store the fuel for later use; both wind and solar are use it or lose it "fuel" sources. As such these projects are typically run with first priority then complemented with hydro.</p> <p>PacifiCorp reply on 12/29/2021: With growing populations in our service territories, increasingly cost-effective renewables and a societal demand that new energy be sourced from renewable resources, PacifiCorp has identified new renewable generation sources will be needed to meet future electrical demand. Unlike thermal based generation that you can stock/schedule fuel supply, the renewables "fuel" sources (sun, wind and water) are intermittent or in the case of hydro can only be stored to the reservoir size associated with the project. Hydro generation can only run full capacity until the water in the reservoir is gone or the elevation drawdown impacts water withdrawal to the powerhouse. Also, in some cases reservoir elevations must be held to meet irrigation water rights/demands or recreation requirements. PacifiCorp's reservoirs are not large enough to sustain a full generation long-term operation unless inflows are greater than the capacity of the powerhouse. Renewable resources projected to be added to the system in the CEIP are extremely cost-effective in meeting system requirements, including retail load, and have been selected based on least-cost least-risk metrics. Future rates for Washington customers will be higher without these resources. Hydro dispatch potential is extremely valuable and is managed to keep costs low in a regulated environment where immediate water availability is not the only factor. For detailed information regarding the economics of resources and optimal system outcomes, please refer to the company's 2021 IRP, publicly available at 2021 IRP Volume 1 (pacificorp.com), and specifically Chapters 7, 8 and 9.</p>	Email
208	2021-10-18	Observer or Public Comment	CEIP Mailbox	CEIP	<p>In my opinion, "Pacific Power" can promote Green electrical production within its service area. However I think with the existing WASHINGTON STATE housing is in dire need of insulation upgrades. The amount of KW usage by residential house could be reduced with an immediate attic insulation upgrade. Any efforts you can make in this issue will pay off in big dividends to your customers.</p> <p>I have started working on my 1905 Walla Walla house. see attachment with the intent of total annual KW reduction. I have converted to an "All Electric" house</p> <p>IMPROVEMENTS Disconnected from Cascade Gas Service Disconnected HVAC ducted 50 year old Gas Furnace ----- Upgraded to 200 AMP Service Added RHEEM Classic Performance Water Heater (Added 4) Daiken Mini Splits Foil Radiant Barrier Roof Rafters coverage in the attic R30 to R60 Attic Fiberglass floor insulation</p> <p>NOTE Made a submission to Pacific Power for a Case Study on my performance for 2022 KW usage reduction.</p> <p>I listed below your two service areas States: Oregon / Washington.</p> <p>Oregon is in dire need to begin to reduce its Fossil Fuel electrical generation</p> <p>Washington (in good shape) can increase the # of WIND TURBINES to begin to reduce its COAL and Natural Gas usage over time.</p> <p>[Email included attachments of graphs and photos not included in this log]</p>	<p>Comment acknowledged and considered in ongoing implementation process.</p>	Email
209	2021-10-26	Observer or Public Comment	CEIP Mailbox	CEIP	<p>Your mad rush to embrace green energy means higher costs, less reliability, environmental degradation and wildlife destruction. We'll have brownouts in the not too distant future, thanks to the closure of coal plants in this region. You can see the future in Europe, which has embraced your vision and is poised to shiver through the winter. But at least some rich investors will do great.</p> <p>Charging people more for electricity when demand is higher is punitive to those of us on a fixed income. I am a retired senior who worked all my life. I live on Social Security and and a very small savings. I don't get help from government programs like Medicaid and food stamps and free this and that.</p>	<p>Comment acknowledged and considered in ongoing implementation process.</p>	Email
210	2021-11-05	Observer or Public Comment	CEIP Mailbox	PacifiCorp Information	<p>This clean energy campaign is just another money maker for the industries it will create, who will all become billionaires. So what is your plan to not PUNISH the seniors on fixed incomes?</p>	<p>Comments acknowledged and considered in ongoing implementation process.</p>	Email
211	2021-11-05	Observer or Public Comment	CEIP Mailbox	CBIs	<p>Attached please find a letter to Director Maxwell and the Joint Comments on Customer Benefits Indicators on behalf of The Energy Project, Front and Centered, NW Energy Coalition and Public Counsel. These documents were filed in the above-referenced docket via the UTC's Web Portal today.</p> <p>You are being copied on this filing per the UTC's master service list in this docket.</p> <p>[Attachments removed: CBI List, Cover Letter to Director Maxwell, Certificate of Service]</p>	<p>PacifiCorp completed a comprehensive review of the July 30, 2021 Joint Comments on CBIs prepared by the Joint Advocates. PacifiCorp compared the Joint Advocate CBIs and metrics to those being considered by PacifiCorp. This mapping exercise resulted in refinements to several of PacifiCorp's CBIs and the adoption of additional metrics as reflected in the draft and final CEIP. PacifiCorp's comparative analysis was transmitted to the Joint Advocates on October 25, 2021. PacifiCorp initiated and participated in a conference call with the Joint Advocates on November 19, 2021 to respond to comments from the Joint Advocates contained in the draft CEIP as well as PacifiCorp's mapping exercise. The Energy Project also completed a comparative analysis of the CBIs and metrics proposed by the Joint Advocates to those proposed by the PacifiCorp. Copies of the CBI comparative analyses prepared by PacifiCorp and The Energy Project are found in Appendix A of the final CEIP.</p>	Email, formal response dated October 25, 2021, and teleconference

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
212	2021-11-08	Observer or Public Comment	CEIP Mailbox	PacifiCorp Information	I've been a customer for about a decade. I just found out that your power comes from coal. Frankly this is outrageous. I've always assumed that here in Washington we do not have to worry about all of the issues related to fossil fuel electricity production because we have abundant Hydro and wind power in our state. While that may be true for the majority of Washington's counties for some unexplained reason Yakima County is stuck getting power from your dirty out of state coal plants. That's shocking to me and it should be to most people living in this community. Please switch out of this power source and inform the public about how many carbons you are releasing per KWH so that we can keep track of progress. Obviously carbon capture can do a lot and I would go there first to clean up your plans. There are Coal plans all over the world that have been implementing 100% carbon capture. Please do this as fast as possible.	Comment acknowledged and considered in ongoing implementation process.	Email
213	2021-11-09	Observer or Public Comment	CEIP Mailbox	CETA	First, we have politicians and profiteers, not scientists, creating energy policy. The equity/communal/idealist approach is an anathema to getting low-cost energy to EVERY single person regardless of race, political party, or citizenship. Energy is energy, no matter WHO it benefits. Second, solar farms and wind turbines are the most unreliable, unproductive, COSTLY/SUBSIDIZED/ECO DEADLY energy devised by man. Last, these carbon-free plans are specifically (purposefully) void of new technological improvisation, and they are SUICIDAL. New technology has been steadily advancing, including clean coal and clean nuclear, and fusion is making rapid advances, while the push for rare earth elements to create renewable batteries creates a near total dependence on China for supply. The term "SUICIDAL" posits actual reality, that while CEIP is looking to a carbon free future, the most congested smog ridden environment on earth = China, is CURRENTLY BUILDING over 200 new coal plants (as we speak!), while at the same time using that coal to build a massive military infrastructure which is building new nuclear submarines, hypersonic missiles, and other advanced weaponry.	Comments acknowledged and considered in ongoing implementation process.	Email
214	2021-11-10	Observer or Public Comment	Public Meeting 3	CETA	What is the definition of "renewable" and how does that differ from "[Greenhouse Gas] Neutral"?	CETA defines "renewable resources" as (a) Water; (b) wind; (c) solar energy; (d) geothermal energy; (e) renewable natural gas; (f) renewable hydrogen; (g) wave, ocean, or tidal power; (h) biodiesel fuel that is not derived from crops raised on land cleared from old growth or first growth forests; or (i) biomass energy. It also defines nonemitting electric generation as "electricity from a generating facility or a resource that provides electric energy, capacity, or ancillary services to an electric utility and that does not emit greenhouse gases as a by-product of energy generation." While CETA does not use the term GHG neutral, both types of resources are GHG neutral.	Answered in meeting
215	2021-11-10	Observer or Public Comment	Public Meeting 3	CETA	Is hydroelectric power "renewable"?	Yes, hydroelectric power is included as an eligible renewable resource in CETA.	Answered in meeting
216	2021-11-10	Observer or Public Comment	Public Meeting 3	PacifiCorp Information	Is the production, materials, end of life, and raw material sourcing of the power generation facilities (solar, wind, etc.) factored or addressed in your carbon neutral plan?	The carbon footprint metrics we have do not look at emissions from the production of the equipment itself; they only calculate system-level emissions of the portfolio of resources and equipment being analyzed based on a model's dispatch of the resources. Proxy cost assumptions include demolition costs for solar and wind.	Answered in meeting notes
217	2021-11-10	Observer or Public Comment	Public Meeting 3	Named Communities	[I] noticed that 42% of your customer base speaks Spanish at home. Does the uptake of these programs reflect that demographic?	We are working with our communication teams to ensure that we have linguistically targeted programs. We are hoping participation will increase in targeted communities with an increase in targeted communication. The Community Outreach and Engagement category of actions includes plans to increase targeted Spanish communication and ads (e.g., radio), having live interpreters, and more.	Answered in meeting
218	2021-11-10	Observer or Public Comment	Public Meeting 3	Utility Actions	Given Pacific Power's increased and increasing reliance on wind power, what actions are you taking to avoid the hundreds of deaths which occurred in Texas last winter due to frozen wind machines?	When PacifiCorp issues requests for proposals (RFPs), we include technical specifications that bidders are required to adhere to, and we require bidders to design systems that are appropriate for our context. From a system planning perspective, we model with an eye towards managing risk. We take into account even highly unlikely scenarios. PacifiCorp's system is diverse, and we have redundancies built in. Finally, Texas' problems in winter 2020 stemmed primarily from difficulties at improperly weatherized natural gas generation, not wind resources.	Answered in meeting
219	2021-11-10	Observer or Public Comment	Public Meeting 3	Utility Actions	Demand response question: Will high-demand reduction be sought during certain times of the day, certain days of the year (high energy use days), or both?	Both. We are focused on specific times of the day during hours are when demand is typically highest and on specific times of the year, typically in summer and winter months. Each program offers opportunity for load reduction, and it depends on when customer is using the load. Each program also has parameters around how we manage demand response, and we will be upfront with customers' boundaries. For example, for commercial and industrial customers, there are boundaries that limit how often we'd request a demand response event, based on hours per year, duration, and frequency.	Answered in meeting
220	2021-11-10	Observer or Public Comment	Public Meeting 3	CETA	What actions, if any, is Pacific Power taking toward the repeal of CETA?	PacifiCorp has no plans to do this. We are aligned with CETA's objectives.	Answered in meeting
221	2021-11-11	Observer or Public Comment	CEIP Mailbox	Utility Actions	I attended Pacific Power's Draft CEIP meeting yesterday. The "Yakima Unit" was mentioned on numerous occasions during the call. My understanding from the call is that this unit will come online 2030 and be part of PAC's resource supply. Are you able to provide with me with any more information regarding this unit? I am sure any resources you can provide will be helpful.	In regards to your question about the 2030 renewable resource selected in Yakima, Washington as part of Pacific Power's CEIP and long-term plan to meet Washington's clean energy targets, please see the following list of references from the 2021 Integrated Resource Plan: 1.2021 IRP Volume I: Integrated Resource Plan Chapter 9, subsection "Preferred Portfolio Selection" •This subsection includes a high-level discussion of the assessment that lead to addition of the 2030 Yakima renewable resource for purposes of meeting Clean Energy Transformation Act (CETA) targets. 2.2021 IRP Volume II: Appendices Appendix O "Washington Clean Energy Plan" •This subsection includes additional discussion specific to CETA requirements, the Washington-allocation of the preferred portfolio and is a precursor to the CEIP. 3.2021 IRP Volume I: Integrated Resource Plan Chapter 7, Table 7.1 – 2021 Supply-Side Resource Table, page 172 •Under the "Fuel" category, "Solar + Storage + Wind" that is located in "Yakima, WA" under the "Resource" column corresponds to the 2030 renewable resource in question. This table contains cost and attribute assumptions used in the modeling process.	Email
222	2021-11-13	Observer or Public Comment	CEIP Mailbox	Utility Actions	I am suggesting inserting (SMRS) small nuclear production at existing Coal Fired location sites. Then whittle down the remaining existing location with similar replacements. https://www.energy.gov/ne/advanced-small-modular-reactors-smrs The reality is TRANSMISSION from existing facilities to exiting client in a short timetable is the problem. These existing locations of Coal Fired Plants have that delivery infrastructure. A seamless (SMRS) connection to the TRANSMISSION lines solves Pacific Power's Goals quickly and less costly. Other government would re [SIC].	Comment acknowledged and considered in ongoing implementation process.	Email
223	2021-11-13	Observer or Public Comment	CEIP Mailbox	Utility Actions	[Attached removed: EIA DEC 2018 Washington State Electricity Generation graph] The INSULATION incentive to put in in existing HOMES R39+ attic insulation reduces your existing (65+) SENIOR HOMEOWNERS customers usage. This targeted group lives 24/7 in their homes unlike the workforce who leaves their home during the day and crank up the HVAC for heat/Cool. These two actions would be "A WIN WIN" solution for Pacific Power Goals that should NOT be ignored.	Comment acknowledged and considered in ongoing implementation process.	Email

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
224	2021-11-15	Observer or Public Comment	CEIP Mailbox	Utility Actions	A City has several sub-stations within its boundary. The commercial areas (highest usage) would benefit greatly by adding an SMRS into that transmission hub to feed the usage.	PacifiCorp's 2021 Integrated Resource Plan considers nuclear projects and existing generation sites in its optimized selection of resources to meet long-term customer needs. The company anticipates continuing to consider these opportunities in the future. For more information about nuclear resources in the 2021 IRP, please refer to Chapter 7 of the IRP, publicly available at this weblink Integrated Resource Plan (pacificorp.com).	Email
					The Coal Fired Plants would begin to operate less frequently and eventually close down.		
					[Follow Up email sent later in the day]		
					Thanks for the reference on NATRIUM. A good idea.		
					My 2nd suggestion follow -up was localized SMRS at the local sub-station.		
225	2021-11-17	Observer or Public Comment	CEIP Mailbox	Utility Actions	[Follow Up email sent on 16-Nov-2021]	[Response to second email]	
					All Pacific Power existing houses should be now upgraded to 200 AMPS. The elimination of Nat Gas appliances, purchases of EV (needing 50 AMPS dedicated for charging) and the All Electric house becoming the normal. Many current houses are at 100 AMPS in Washington.	Thank you. Your suggestions are being noted and considered.	
					[Follow Up email sent 17-Nov-2021]		
					Bill Gates' TerraPower will build its first advanced nuclear reactor in a coal town in Wyoming [Link to CNBC removed]		
					[Follow up email to a note received 11-Nov-2021]	The compliance shortfall identified in 2030 was based on the requirement to meet a percentage of all electricity sales to Washington customers with owned renewable and non-emitting resources – the shortfall was not specific to one area of customers. The selection of an additional wind resource with solar and co-located storage in Yakima was considered an optimal decision based on the system infrastructure and viable resource options. For example, the project would take advantage of existing and planned transmission capacity so that additional transmission lines do not need to be built.	Email
Upon review of the materials, I have a few remaining questions. If I understand correctly, you (PAC) are saying that you have a supply shortfall in the Yakima Municipality (?) area that would be addressed with a 160 MW wind/solar resource with storage. Is that correct? Or, are you referencing a specific project?	The resource may serve customer electricity need in the Yakima area, but it is part of a larger integrated system and could supply energy for neighboring areas and contribute to system reserves.						
226	2021-11-17	Current EAG Member	CEIP Mailbox	CEIP	[Follow up email received on 17-Nov-2021]	[Response to follow up email]	
					Thank you for that clarification. Does PAC intend on issuing a RFP in the future for the wind resource with solar and co-located storage in Yakima or have they already selected a resource?	The Yakima resource is a proxy resource selected in 2030 in the 2021 Integrated Resource Plan. This is beyond the company's current action plan window (2022 – 2025) and thus beyond the period of time for which the company would issue a Request for Proposal. The 2030 clean energy target will be subsequently evaluated in the next several IRP cycles (done on a biennial basis) and with updated forecasts and new information, the proxy resource selection could change. If within a closer time frame to 2030 the Yakima wind and solar resource co-located with storage is still the optimal proxy resource selection, such a resource could be included in an RFP.	
					Thanks for the EAG meeting. I have a question on page 8 of the CEIP-- it states: "The interim targets are informed by the company's historical performance under median water conditions, which is a factor in developing expected resource behaviors and Washington retail sales."	The 2021 Integrated Resource Plan incorporates a climate change scenario in which there is an approximate 7 percent reduction in hydro availability due to climate-related low water conditions. The study also incorporates unfavorable hydro volatility which affects future system costs. While the company has not calculated a separate set of interim targets based on this study, the expectation is that by 2025 the interim target would be lower than the estimated 50 percent level where it now sits in the CEIP. In order to reach the 2030 and 2045 CETA standards for interim targets in such a future, the company would adapt its portfolio going forward, possibly by investing in even higher levels of demand-side management resources such as energy efficiency and demand response, and by siting additional renewable generation to compensate for the loss of hydro generation.	Email
					I'm curious if you can share more about this statement? If I understand correctly, it's stating that the targets for the first 3 years are based on median water conditions in the region. How will this plan change if/when we have drought conditions and/or water conditions are impacted by the climate crisis?	The company anticipates continuing to study climate change, including hydro impacts, and is committed to being responsive to changing conditions.	
						For additional information on the climate change case, please refer to the 2021 IRP Volume I, Chapter 9 – Modeling and Portfolio Selection Results, page 314.	
227	2021-11-17	Current EAG Member	EAG Meeting 7	PacifiCorp Information	Does PacifiCorp sell wholesale electricity in Washington?	PacifiCorp does not have wholesale customers in Washington.	Answered in meeting
228	2021-11-17	Current EAG Member	EAG Meeting 7	Utility Actions	Are Greenhouse Gas (GHG) emitting resources being allocated to non-Washington customers in order to reach interim targets?	PacifiCorp optimizes its portfolio of generating resources across its six-state system as a whole and the allocation methodology is such that some of PacifiCorp's non-Washington customers may be allocated emitting resources. In some cases, early retirement of system emitting resources might occur, but not necessarily due to CETA requirements.	Answered in meeting
229	2021-11-17	Observer or Public Comment	EAG Meeting 7	Interim Targets	What accounts for the big jumps in the percentage of clean energy in PacifiCorp's portfolio in 2024-2025 and 2029-2030?	Washington is exiting all coal systems in 2025, so the capacity of other renewable resources will come online to replace this demand. In 2030, modeling indicated a small shortfall in renewable and non-emitting resources to meet CETA's 2030 Specific Target, and as a result PacifiCorp is procuring new Washington-sited renewable resources.	Answered in meeting
230	2021-11-17	Observer or Public Comment	EAG Meeting 7	Interim Targets	Why in the interim targets does the percentage of renewable energy drop slightly in 2036?	These targets are indicative and won't necessarily reflect the exact percentages in any given year. The targets are the result of aggregating all hours in each year (to get total megawatt-hours (MWh)), and they can change due to the assumptions of asset performance and other impacts, like weather assumptions.	Answered in meeting
231	2021-11-17	Current EAG Member	EAG Meeting 7	CBIs	Does the overall percentage of customers experiencing energy burden (24.4%) represent all customers including those who are not in named communities?	Yes, that is the average for all customers. The highly impacted communities (HICs) percentage includes vulnerable populations located in those census tracts.	Answered in meeting
232	2021-11-17	Current EAG Member	EAG Meeting 7	CBIs	Can PacifiCorp give an indication of the absolute number of customers that are considered energy-burdened?	Yes, that data is available in Table 2.17 on Page 43 of the draft CEIP.	Answered in meeting
233	2021-11-17	Current EAG Member	EAG Meeting 7	Utility Actions	Are gas to electric appliance conversions incentivized in the low-income weatherization program?	Currently, in 2021, there are no incentives for gas to electric appliance conversions. Efficient electric heat has to be installed in a home with an existing operable electric heating system. Starting in 2022, PacifiCorp has proposed to expand the program to convert solid fuel, propane, and oil to electric. Additionally, the proposal provides for gas to electric conversion when the existing system presents a health hazard to the customer. The proposed gas to electric conversion only applies to homes with gas systems that have inadequate combustion air as determined by the agencies that delivers weatherization services.	Answered in meeting notes
234	2021-11-17	Current EAG Member	EAG Meeting 7	Incremental Costs	How does the \$5.6 million in incremental costs factor into the overall costs?	The overall costs and revenues are in Table 4.4, on page 70 of the draft CEIP.	Answered in meeting

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
235	2021-11-17	Observer or Public Comment	EAG Meeting 7	Incremental Costs	Do the Community Outreach and Education actions outlined in the CEIP factor into the incremental cost calculations?	As a result of the CEIP development process, especially feedback from the EAG, PacifiCorp is taking steps to modify or expand its community outreach and engagement actions. Incremental cost calculations in the CEIP include cost estimates for public outreach, EAG meeting facilitation, and translation services.	Answered in meeting
236	2021-11-17	Observer or Public Comment	EAG Meeting 7	Utility Actions	Does PacifiCorp plan any programs to lower barriers for customer-sited rooftop solar and storage?	There are no specific actions in the CEIP related to customer-sited generation. PacifiCorp is considering projects such as co-locating storage with customers.	Answered in meeting
237	2021-11-17	Observer or Public Comment	EAG Meeting 7	Utility Actions	Does PacifiCorp have programs focusing specifically on electric vehicles (EVs)?	The draft CEIP includes a proposal for an EV program targeted at transportation electrification in named communities.	Answered in meeting
238	2021-11-17	Observer or Public Comment	EAG Meeting 7	Incremental Costs	Is the EV program within the draft CEIP intended to be an incremental cost as defined by CETA?	No.	Answered in meeting
					EAG members provided the following feedback on Utility Actions in the draft CEIP:	Comments acknowledged and considered in ongoing implementation process.	Discussed in meeting
239	2021-11-17	Current EAG Member	EAG Meeting 7	CEIP	<ul style="list-style-type: none"> All EAG members expressed support for education and outreach that is culturally and linguistically responsive. All EAG members indicated that community access so that all customers can participate in programs is paramount. One member expressed concern that near-low-income/Asset Limited, Income Constrained, Employed (ALICE) members of the community get lost in the draft CEIP. Avoid creating a "missing middle." It would be helpful if PacifiCorp was more specific on their actions. PacifiCorp will need to work closer with community partners and organizations to credibly engage with communities and ensure fuller participation. The EAG expressed appreciation to PacifiCorp for providing a space to hear from the EAG and hope that the process provides a precedent for the future. 		
					Following review of PacifiCorp's Draft Clean Energy Implementation Plan, the Alliance of Western Energy Consumers has the following two recommendations for potential incorporation into the Company's Final CEIP:	PacifiCorp may transfer renewable energy credits (REC) between states as an alternative to purchasing RECs in the market, when needed. The company has, in the past, transferred RECs from a state that does not have a renewable portfolio standards (RPS) and a state that does, specifically, from Utah and Idaho to California. These transfers generally require support from both jurisdictions on the price associated with the transfer and, historically, agreement is not always reached as to the price. It is PacifiCorp's current perspective that it cannot therefore reliably count on this type of transfer for future compliance, as it would make compliance with Washington law contingent on another state's actions.	Email
240	2021-11-23	Alliance of Western Energy Consumers (AWEC)	CEIP Mailbox	CEIP	-PacifiCorp currently allocates renewable energy credits to all of the states it serves, even though some states do not require RECs for compliance with a clean energy law. PacifiCorp should analyze the cost to Washington of purchasing RECs from these states as a means of CETA compliance. The company should compare this cost with the cost of its proposed compliance pathway identified in the Draft CEIP (which, as AWEC understands it, is primarily based on the action plans of its most recent IRPs and relies primarily on new renewable resources and transmission).		
241	2021-11-23	Alliance of Western Energy Consumers (AWEC)	CEIP Mailbox	CEIP	-The Draft CEIP mentions PacifiCorp's proposal to convert Jim Bridger Units 1 and 2 to gas, but states that PacifiCorp "does not anticipate allocating any of the converted Jim Bridger units to Washington." (Draft CEIP at 16). This statement is not accompanied by any explanation or analysis. AWEC recommends that PacifiCorp explain and justify its proposal not to allocate a portion of the converted Bridger units to Washington.	In regards to the proposal to convert Jim Bridger Units 1 and 2 to gas and an assumed allocation within the draft CEIP: this statement is PacifiCorp's tentative view of a question that will be addressed in future multi-state protocol 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 multi-state process.	Email
					As PacifiCorp staff know, Public Counsel was part of the group of joint advocates who proposed a set of customer benefit indicators earlier this year. We continue to support those CBIs and concur with the analysis done by The Energy Project in evaluating and comparing the joint advocate CBIs with the CBIs in Pac's draft CEIP. Public Counsel does appreciate Pac's willingness to engage with the joint advocates on the CBIs and for providing the comparative document earlier this fall.	PacifiCorp has included additional detail in the final CEIP that further outlines a plan for increased outreach to named communities. PacifiCorp will continue to refine this plan through collaboration with its EAG and advisory groups.	CEIP updated
242	2021-12-03	Public Counsel	CEIP Mailbox	CEIP	Given the comments and analysis about CBIs that has been shared with Pac through the joint advocate meetings, the comments below are focused mainly on the specific action chapter of the draft CEIP and some thoughts about public participation:		
					•Chapter 3 calls out four main areas of specific actions: supply side resources, energy efficiency, demand response, and community outreach & engagement. The section on community outreach & engagement feels less fully developed and with fewer details on specific actions than other areas of the chapter. I do understand that the company wants to work with community partners to develop this area, but I'd encourage the company to include more information to outline a plan and provide examples of the type of materials they plan to develop in the final CEIP.		
243	2021-12-03	Public Counsel	CEIP Mailbox	CEIP	•In chapter 3, there are a few places where the table titles in the text need to be updated. For example, at the bottom of page 60, it references the budgets shown in Table 3.9, but the budget ranges are shown in Table 3.7.	Tables and references in Chapter 3 have been updated to reflect the appropriate table numbering.	CEIP updated
244	2021-12-03	Public Counsel	CEIP Mailbox	CEIP	•Table 3.9 on pages 62-64 appears to have some color coding, but it's not clear what the color coding means. It would be helpful for the company to identify what this is to symbolize in the final.	A legend has been added illustrating what each color category represents in Table 3.9	CEIP updated
245	2021-12-03	Public Counsel	CEIP Mailbox	CEIP	•In general, I appreciate Pac's good faith effort to engage with their equity advisory group. The EAG meetings were well run. The company did engage with other advisory groups to a lesser extent. I know there were a number of members overlapping between the EAG and the low income advisory group, but it would've been good for the company to do a bit more with that advisory group in particular.	The company appreciates this feedback and plans to engage the low income advisory committee on CETA topics going forward.	CEIP updated
					•I also appreciated Pac's efforts during their series of evening public meetings. I'd be curious to see information about how many people participated in those general public meetings and how those were advertised. Part of the reason that I'm interested in more detail in the communications and outreach section of specific actions is because I'm curious to see what lessons the company learned in their public outreach related to the CEIP and how they might adjust their strategies going forward.	The number of attendees (unique individuals) at each public participation meeting is as follows: Meeting 1: 18 Meeting 2: 16 Meeting 3: 17 Outreach methods for these meetings included: direct email to customers, direct email to stakeholder groups, bill inserts, press releases, text message notices, a flyer sent to EAG members to distribute, newspaper ads, social media ads, radio ads, and a recording when Washington customers call our Customer Care Center. Several of these outreach methods were added or adjusted based on EAG and public feedback, and will likely be implemented in the future. Table 5.1 in the CEIP has been updated to reflect outreach methods that will be used during the 2022-2025 implementation period.	CEIP updated
247	2021-12-03	The Energy Project (TEP)	Docket UE-210829	CBIs	The Energy Project joined with Front and Centered, the Northwest Energy Coalition, and the Public Counsel Unit of the Washington Attorney General's Office to develop a draft list of Customer Benefit Indicators (CBIs). The Joint Advocates (JA) initially shared this list with the Company and stakeholders in late July 2021 and have subsequently filed the list in this docket.	PacifiCorp appreciated the opportunity to participate in a conference call with the Joint Advocates on November 19, 2021 to respond to comments from the Joint Advocates on the CBIs contained in the draft CEIP as well as PacifiCorp's October 25, 2021 CBI mapping exercise. PacifiCorp reviewed the CBI comparative analysis and comments prepared by The Energy Project. Specific responses to comments are presented below.	Comment noted
					[This submission included the following attachments: 210829-TEP Cmts-12-3-12.doc/pdf - summarized in the following comments; 210829-TEPCLtr_12-3-21.pdf - a cover letter; 200829_TEP Attachment A Table 1.docx/pdf - a table comparing the Joint Advocate submission to PacifiCorp's CEIP]		
248	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	PacifiCorp's Draft CEIP outlines the CBIs at Table 2.3. One confusing aspect of this table is that multiple statutory elements are often indicated for a given CBI. For example, "non-energy benefits" is referenced for four of the nine CBIs. In contrast, the statutory elements "energy security" and "energy resiliency" are shown as pertaining to only a single CBI. The Company indicates this modification to the organization of the CBIs was made later in the process, after reviewing Avista's draft CEIP. We recognize that some degree of overlap certainly exists, but TEP believes this structure creates unnecessary confusion. Ultimately, it is important to make sure that each statutory element receives equal weight and consideration within the CBIs. For clarity, we recommend a structure along the lines of the Joint Advocates' CBIs, whereby the CBIs are organized around a single statutory element.	Initially in the CEIP process, PacifiCorp envisioned that each CBI would be associated with one statutory element. Later in the process of developing the CEIP, it became apparent that not all CBIs would be associated with a single statutory element. The company's proposed CBIs illustrate the reality that some CBIs touch upon more than a single statutory element.	Comment noted

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
249	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	PacifiCorp undertook a weighting process with the Equity Advisory Group (EAG) and its customers through a public survey. An area of concern for TEP is that as a general matter, this exercise seeks to prioritize certain statutory elements over others, which is not contemplated under Clean Energy Transformation Act (CETA).	In addition to developing a weighting process with the EAG and its broader customer base through a public survey, the company also obtained feedback through a survey of the low-income advisory group, the DSM advisory group and the Washington IRP stakeholder group which was used to inform the company's CBI weights. Per WAC 480-100-655(2)(a)(ii), the company is required to obtain input from the public regarding CBI weighting factors. Further, in light of timing requirements for filing PacifiCorp's Draft CEIP (November 1, 2021), it was necessary to develop an approach to obtain input from all customers regarding their prioritization/weighting of benefits from the Clean Energy Transformation Act without having well-defined CBIs at the time of survey implementation. However, the company did have access to statutory elements that it could later incorporate with forthcoming EAG input. PacifiCorp's public survey was made available in English and Spanish and was active over the July 2, 2021 to August 10, 2021 timeframe. Given the aforementioned considerations, the relationship between CBIs and statutory elements, provides the nexus to develop CBI weights that account for input from the public, the EAG, the low-income advisory group, the DSM advisory group and the Washington IRP stakeholder group. Within the Final CEIP, the company has used the statutory elements weightings as presented in the Draft CEIP to develop CBI specific weights.	Comment noted
250	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	PacifiCorp engaged with its EAG on development of the CBIs and draft CEIP, and also sought feedback from its customers via a public survey. However, the customers responding to an internet survey are most likely not fully representative of the Company's customer base. Another area of concern is that other stakeholder advisory groups were not actively engaged as part of the development of the CEIP. The Energy Project appreciates that PacifiCorp did hold a recent meeting with the JA in mid-November, subsequent to filing of the Draft CEIP. We hope that dialogue can continue, and that in the future, all stakeholder advisory groups are engaged more fully and actively on CETA implementation matters.	PacifiCorp realizes that it has work to do to engage its customer base. As reflected in the CEIP and specific to our CBIs, outreach and engagement are critical to achieving the desired outcomes. PacifiCorp looks forward to continuing to collaborate with its EAG and will place a greater emphasis on seeking input on CETA issues with its existing advisory groups and stakeholders in this process.	CEIP updated
251	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	As mentioned above, TEP worked with JA to develop a draft list of CBIs shared with PacifiCorp in late July, 2021. The Company discusses the JA CBIs and indicates that in a few areas, modifications were made to the draft CBIs to incorporate feedback from the JA list. We appreciate that consideration and modification. The Energy Project has prepared a comparison analysis, and found that 46 percent of the JA CBIs were at least partially addressed through PacifiCorp's list. An Attachment A provided with these informal comments provides that analysis. The Energy Project strongly encourages PacifiCorp to look further at the JA CBIs, as our primary feedback is that we continue to recommend inclusion of all of the Joint Advocate CBIs. A few areas of omission are discussed below.	PacifiCorp views its 2022 CEIP as a starting point for determining the appropriate benefit indicators and metrics for assessing an equitable transition to clean energy. Indicators and metrics will continue to be refined over time through advisory group input, benchmarking, and data collection and analysis. PacifiCorp believes that it has met its statutory requirements for the development of CBIs in this inaugural CEIP. PacifiCorp will consider adding or modifying CBIs in future CEIP cycles, based on input by stakeholders.	Comment noted
252	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	<i>Arrearages 90+ days</i> . As part of the Covid-19 relief docket, the IOU data filings have underscored that those customers with arrearages 90 or more days past due are the customers most struggling to pay their bills and therefore most at risk of disconnection. While the draft CEIP includes residential disconnections as a CBI, TEP believes that Arrearages 90+ days, with a breakdown in the data as suggested by the JA CBI's, is an important metric to also include in the CEIP. The JA list included Arrearages 90+ days as a CBI for the 'Reduction in Cost' statutory element.	As part of the disconnection reduction plan filed December 2021, PacifiCorp is working with the Low Income Advisory Board to explore an arrearage management program (AMP). AMP programs are intended to target customers past due balances. The result of the investigation will be included in the 2023 Annual Clean Energy Progress Report which may include recommendations for associated CBIs and metrics.	Comment noted
253	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	<i>Low-income and Vulnerable Populations Access to Renewables and Distributed Energy Resource (DER)</i> . This CBI metric from the JA list (as an 'Energy Benefit' CBI) is not at all addressed in PacifiCorp's draft CEIP. Appendix A to the draft CEIP provides a mapping of the Company's draft to the JA CBIs, and for this metric explains: "The Company has historically supported the creation of state funded renewable energy incentives targeted to low-income customers. As the state adopts renewable incentive programs in the future, the Company will evaluate how to encourage their use in our service territory." In general, this seems to be more of a passive approach. The Energy Project encourages PacifiCorp to work with stakeholders and seek to more actively encourage greater access to renewables and DERs for low income and vulnerable populations.	PacifiCorp does support and has historically supported state-funded renewable efforts and will continue to do so in the future. Although DER programs could provide increased storage and backup power, EAG members expressed that DERs installations are not the highest priority for customers in Named Communities. PacifiCorp may consider this for future CEIPs. Please also refer to comment number 251.	Comment noted
254	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	<i>Improved Access to Reliable Clean Energy</i> . The JA CBI list included this CBI under the 'Energy Security' statutory element. Specific metrics within this proposed CBI included increased storage and backup power in neighborhoods for emergencies, increased DER in low-income neighborhoods, and optimizing grid investments through increased distribution system planning. Appendix A to the draft CEIP shows that the Company is not planning to track any of these metrics (for DER they mention again the Company's historic support of state funded renewable efforts). We encourage PacifiCorp to consider inclusion of this CBI in the Final CEIP.	Please refer to comment number 253.	
255	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	CBIs	Additional issues included in the JA CBIs but omitted from PacifiCorp's draft CBI list include the following: <ul style="list-style-type: none"> •Improved health outcomes •Reduced pollution burden and pollution exposure •Electrification of transit •Increased home comfort •Reduced health care costs •Review of utility credit code scoring and fewer customers with low utility credit codes. 	Although PacifiCorp did not explicitly adopt all of the CBIs proposed by the Joint Advocates, many of the same themes are captured and reflected as metrics or specific actions. 1&2. PacifiCorp does not plan to track "Reduced pollution burden and pollution exposure" because the company does not have significant emitting resources located within its retail service communities in Washington and is therefore not a large direct contributor to pollution burden within its service territory. PacifiCorp will contribute to improving air quality through decreased use of wood for home heating. PacifiCorp will track the "Indoor air quality" CBI via the metric of "number of households using wood as primary or secondary heating." 3. Although PacifiCorp did not explicitly adopt the CBI of "Electrification of transit" as proposed by TEP, the company has adopted "Community-focused efforts and investments", for which a specific action under this CBI will be the establishment of an EV grant program. 4. Although PacifiCorp did not explicitly adopt the CBI of "Increased home comfort" as proposed by TEP, the company has adopted "Participation in company energy and efficiency programs and billing assistance programs", for which an NEI, Residential - Thermal Comfort, is available from the DNV study. 5. PacifiCorp does not plan to track "Reduced health care costs" because the company does not have significant emitting resources located within its retail service communities in Washington and is not a large direct contributor to poor air quality issues within its service territory. Although PacifiCorp did not explicitly adopt the CBI of "Reduced health care costs" as proposed by TEP, the company has adopted "Indoor air quality." 6. Although PacifiCorp did not explicitly adopt the CBI of "Review of utility credit code scoring and fewer customers with low utility credit codes" as proposed by TEP, the company has adopted "Residential customer disconnections", for which the company will include a review of the internal credit code as part of an overall disconnect reduction plan.	Email, formal response dated October 25, 2021, and teleconference

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
256	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	Metrics	One example of inclusion of data for HIC in the draft CEIP pertains to duration and frequency of outages. Table 2.20 provides SAIDI, SAIFI, and CAIDI data including major events for all customers, for HIC, and for non-HIC areas. For all three metrics, the HIC data is significantly worse than for non-HIC areas. For example, the SAIDI result for HIC (435) is 92 percent higher than non-HIC (227), indicating that during major events, customers in HIC areas have much longer duration of outages. The CAIDI data shows that during major events, those customers in HIC areas would experience an outage of 210 minutes on average, 44 percent higher than the 146 minutes for non-HIC areas. As discussed below under "Specific Actions," this is the type of data and information that can be particularly helpful in tracking performance under CETA, and especially relevant to developing utility actions that can help ensure equitable distribution of benefits.	PacifiCorp conducted further analysis on SAIDI, SAIFI, and CAIDI scores since the draft CEIP filing, specifically analyzing time trends of those scores differentiated by whether the customer's transformer is located within the HIC and non-HIC geographies. Prior to the CETA-specific analysis, such trends would have been performed based upon circuits and their topology rather than census tract geospatial boundaries. The time trend analysis revealed that there has been no persistent bias for HIC versus non-HIC reliability across a seven-year average; the company looks at longer term periods when evaluating smaller data sets to ensure sufficient data points to determine trends. In fact, the level of reliability delivered over that time period ranks in the first quartile nationally, at 85-86 minutes. See additional text and updated figures on those resiliency scores towards the end of Chapter 2. Note that if a utility is required to offer a program or take an action by a different law, then that program or action will not be identified in the CEIP as a specific utility action, even if it is consistent with CETA. Resiliency programs and transmission & distribution planning are one example of that, in which those actions are covered by a separate law. While special attention can be paid to transmission within HICs, for example, those specific actions are not included in this CEIP.	Additional analysis included in the CEIP.
257	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	Metrics	In some areas of the draft CEIP, data by HIC or vulnerable populations is shown as "in progress" (e.g., Energy Burden, at Table 2.16; Residential disconnections, at Table 2.21). The Energy Project looks forward to reviewing that data once it is available. In addition, there are likely other areas where it would be very helpful to analyze this data for HIC and vulnerable populations, such as Arrearages 90+ days, as well as utility credit code scoring (those customers most at risk of pending disconnection), in order to help develop specific actions that can have meaningful impact. As the Company further develops its CBIs for the Final CEIP, TEP encourages further consideration of the JA CBIs and breakdown of data for customers in HIC as well as vulnerable populations. PacifiCorp's planned specific actions are described in Chapter 3, organized around four categories: supply side resources, community outreach & engagement, energy efficiency, and demand response. An overarching concern for TEP is a lack of understanding regarding how PacifiCorp's planned specific actions will impact the CBIs. What is not yet fully clear, is how these planned utility actions relate specifically to the proposed CBIs. A central purpose of the CBIs is to allow the Commission and stakeholders to monitor and track performance related to CETA, and the specific actions should outline and describe the utility's planned actions designed to impact those CBIs.	Please see Chapter 2 of the company's Final CEIP for the available data.	Additional analysis included in the CEIP.
258	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	Utility Actions	PacifiCorp's planned specific actions are described in Chapter 3, organized around four categories: supply side resources, community outreach & engagement, energy efficiency, and demand response. An overarching concern for TEP is a lack of understanding regarding how PacifiCorp's planned specific actions will impact the CBIs. What is not yet fully clear, is how these planned utility actions relate specifically to the proposed CBIs. A central purpose of the CBIs is to allow the Commission and stakeholders to monitor and track performance related to CETA, and the specific actions should outline and describe the utility's planned actions designed to impact those CBIs.	PacifiCorp received feedback from multiple stakeholders on its November 1, 2021 draft on this topic. The company has provided additional explanation and clarity about the process it undertook to connect CBIs to specific actions in the final CEIP. Please see the "Summary of Customer Benefit Indicators" section in Chapter 2, the final section of Chapter 2, and added details in Chapter 3.	CEIP updated
259	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	Utility Actions	As an example of this, earlier we described the SAIDI, SAIFI and CAIDI data provided in the draft CEIP for HIC and non-HIC areas (again, we applaud the Company for inclusion of this type of data). This data is proposed as a CBI for Energy Resiliency (and risk reduction and energy benefit). Above we noted that when major events are included, the data is significantly worse for HIC, indicating that the duration and frequency of outages during major events are worse for customers in highly impacted communities. This would seem to represent a clear finding that could inform specific utility actions in the CEIP, to help improve performance in this metric. However, there is no mention of any actions related to this in the Specific Actions chapter. The Energy Project appreciates that PacifiCorp considered inquiries on this issue during a recent meeting with JA.	Please see the company's response to comment 256.	Additional analysis included in the CEIP.
260	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	Utility Actions	Regarding the community outreach and engagement activities discussed in the Draft CEIP, TEP has some concerns and feedback. The Energy Project encourages the Company to actively engage with stakeholders, including the Low-Income Advisory Group, to help ensure that outreach efforts are working in partnership and utilizing trusted organizations and community partners. The Energy Project shared this feedback during a recent meeting the Company held with JA and we appreciate that the Company seems receptive to this feedback.	PacifiCorp will continue to refine its outreach efforts through collaboration with its EAG and existing advisory groups. Additionally, please refer to the company's response to comment 245.	CEIP updated
261	2021-12-03	The Energy Project (TEP)	CEIP Mailbox	Utility Actions	Another area of concern pertains to costs referenced in the draft CEIP as related to community engagement and outreach. PacifiCorp estimates total incremental costs of \$5.6M annually, which includes in part costs related to outreach and engagement. Given other legislative requirements that include outreach (e.g., SB 5295), as well as ongoing and historic utility outreach efforts, it may not be appropriate for PacifiCorp to assert that all of the costs for the outreach efforts mentioned in chapter 3 are fully attributable to CETA.	PacifiCorp appreciates this feedback. SB 5295's community outreach provisions are specifically directed at developing and promoting discount rates, which is a considerably narrower scope than CEIP community engagement and outreach. Further, the CEIP community engagement and outreach is incremental to longstanding outreach programs, such as the company's various advisory groups, and would not be occurring but for CETA.	Comment noted
262	2021-12-06	Sierra Club	Docket UE-210829	Incremental Costs	CETA not only envisions a bold transformation of the electric sector but also an equitable transformation. Accordingly, the Act prioritizes "[t]he equitable distribution of energy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health, economic, and environmental benefits and the reduction of costs and risks; and energy security and resiliency." In order to achieve these goals, the holistic pricing of energy generation resources—which considers all costs of utilizing that resource—is critical. Integrated resource plans have been the primary vehicle for evaluating generation costs and benefits. Because the carbon intensity of various energy resources has significant impacts on public health and environmental protection—and thus imposes significant costs on society—it is unsurprising that Washington law defines an "integrated resource plan" as "an analysis describing the mix of generating resources . . . that will meet current and projected needs at the lowest reasonable cost," and goes on to define "lowest reasonable cost" as including "the cost of risks associated with environmental effects including emissions of carbon dioxide." CETA reinforces the requirement to evaluate the costs of continuing to emit carbon dioxide and other greenhouse gases by stating that "electric utilities shall consider the social cost of greenhouse gas emissions . . . when developing integrated resource plans and clean energy action plans." Indeed, as the Act's title implies, CETA intends to "spur transformational change in the utility industry" and does so, in part, by requiring that utilities not only recognize the SCGHG but also utilize the SCGHG in a fair evaluation of the "least cost" portfolio. Historically, public health and other societal impacts of continuing to burn fossil fuels have not been priced in integrated resource plans due to claims that these costs are too difficult to quantify or attribute specifically to a utility's customer base. SCGHG is a scientifically valid and widely accepted quantification of these costs. While PacifiCorp claims that the SCGHG is "a significant negative incremental cost that would never actually translate to customers' bills[,] customers do pay for continued reliance on fossil fuels in the form of medical bills and responding to natural disasters made worse by the effects of climate change, among other costs. Even acknowledging that the SCGHG is an imperfect cost estimate, its quantification is much closer to the true social costs of greenhouse gas-emitting resources than how those costs are currently quantified, i.e. as zero dollars.	Following the Commission's December 9, 2021 open meeting and subsequent order issued December 13, 2021, PacifiCorp reassessed its incremental cost approach and determined that it can provide an incremental cost calculation that compares the preferred portfolio to a baseline portfolio that was developed with the SCGHG in the resource acquisition decision. Please refer to both Chapter 4 and "Appendix D - Supporting Referenced and Workpapers" of this CEIP for additional details on the selected CEIP-compliant portfolio as well as other studies considered for this purpose.	CEIP updated
263	2021-12-06	Sierra Club	Docket UE-210829	Incremental Costs	PacifiCorp's assertion that CETA merely requires PacifiCorp to analyze resource portfolios using the SCGHG—but not actually make any decisions using this information—is incorrect. CETA's mandate includes not only that PacifiCorp conduct model runs that use the SCGHG but also that the Company use the SCGHG in determining which portfolios are "least cost." PacifiCorp's failure to do so in its 2021 IRP predictably resulted in what the Company deems "absurd results" when calculating incremental CETA compliance costs against a least-cost portfolio that does properly incorporate the SCGHG. This predicament was predictable and only reinforces that the Company should have been aware that this Commission expected the Company to use the SCGHG in determining a preferred portfolio. Sierra Club recommends that the Commission deny PacifiCorp's Petition requesting an exemption from using the SCGHG in its "alternative lowest cost and reasonably available portfolio" as defined by WAC 480-100-605 and instead order additional model runs from the Company to properly calculate the incremental compliance costs with CETA, in compliance with Washington law. PacifiCorp could do this by adding the SCGHG to its preferred portfolio, as was envisioned by CETA in the first place, and comparing those results against its P02-CETA portfolio. PacifiCorp raises concerns that this approach would result in shifting costs to other states based on Washington's public policy. Alternatively, Sierra Club supports the recommendation put forth by NW Energy Coalition's comments, namely that an additional Washington-specific portfolio run be conducted that freezes resource decisions allocated to other states so that the SCGHG only affects resource decision allocations to Washington. If the Commission has concerns with this approach, other alternatives may be possible that properly apply the SCGHG to Washington's resources, and the Commission should require PacifiCorp to work with stakeholders to develop another solution.	PacifiCorp has resolved these concerns and will present an incremental cost calculation that is based on a baseline portfolio developed with the SCGHG in the resource acquisition decision. See also the company's response to comment 262. Each of the suggested alternatives has been discussed with Staff, and the company has arrived at the best compliance approach based on input from both Staff and Commission based on the written order following the December 13, 2021 order.	CEIP updated

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
264	2021-12-06	Sierra Club	Docket UE-210829	Incremental Costs	Despite CETA's clear intention, PacifiCorp failed to consider the SCGHG in selecting its Preferred Portfolio and now requests an exemption from using the SCGHG in evaluating CETA compliance costs, despite the requirement that it do so in WAC 480-100-605. As described above, CETA intends for utilities to begin using the SCGHG in making resourcing decisions. PacifiCorp violated this requirement with no attempt at compliance. The Commission should deny PacifiCorp's attempt to avoid this mandate.	Please refer to the company's response to comment number 262.	CEIP updated
265	2021-12-06	Public Counsel	Docket UE-210829	Incremental Costs	The Commission previously found that the inclusion of the SCGHG in the baseline portfolio is required by statute, RCW 19.280.030.1. The language of RCW 19.405.060(3)(a) requires the average incremental cost of compliance to include all costs necessary to meet the requirements of RCWs 19.405.040 and 19.405.050. Under the Commission's analysis, RCW 19.280.030 would still be a statutory requirement even accounting for RCWs 19.405.040 and 19.405.050 and must therefore be included in the baseline portfolio. While the Commission has the discretion to grant an exemption to its own rules, it cannot exempt a utility from compliance with state law. If PacifiCorp disagrees with the Commission's interpretation of the statutory requirements of RCW 19.280.030 and its interaction with CEIPs, the appropriate vehicle for such a challenge should have been a petition for reconsideration of the Commission's General Order 601. For these reasons, Public Counsel does not support PacifiCorp's petition for exemption.	Please refer to the company's response to comment number 262.	CEIP updated
266	2021-12-03	Earth Justice (via NWECC)	Docket UE-210829	CEIP	This October 8, 2021 memorandum was prepared by Earth Justice and submitted to NWECC regarding investor-owned utilities' interpretation of the requirement that a CEIP be "consistent with" an IOU's IRP as meaning that a utility's CEIP cannot go beyond the provisions and assumptions contained in its long-range integrated resource plan. Earth Justice states that IOUs' interpretation of "consistent with" is untenable and cannot be reconciled with the purpose, text, or structure of CETA. They go on to state that when the phrase "consistent with" is considered in its statutory context, it is clear that "consistent with" a utility's IRP means compatible with and not in conflict with a utility's IRP, rather than coextensive with a utility's IRP. NWECC provided a copy of this memorandum to PacifiCorp along with its December 3, 2021 comments.	PacifiCorp agrees that the CEIP-compliant portfolio need not necessarily be restricted to the Integrated Resource Plan's preferred portfolio. However, there is an expectation that they will be largely consistent to the extent that reasonable modeling strategies are applied throughout. The company reads this clause as affirming this interpretation, as the clause would not be needed if there were no expectation of consistency.	Comment noted
267	12//3/2021	Northwest Energy Coalition (NWECC)	Docket UE-210829	CEIP	Since this is the first time CEIPs have been developed by Washington utilities, we expect the first efforts to serve as a springboard for clarification, refinement, and improvement. A CEIP should be a relatively short, concise, stand-alone document that clearly delineates the specific actions a utility will undertake over the four-year implementation period. It is not intended to be a mini-integrated resource plan weighing many options, but an explanation of the specific actions that will be undertaken in the short term, just the next four years. While the CEIP is meant to fulfill a regulatory requirement, it should not be solely a regulatory compliance document. Rather, it should serve as a public document, understandable by an interested customer or stakeholder. PAC's CEIP weighs in at 90+ pages, and is generally more concise than the draft CEIPs submitted by other IOUs, as the draft follows directly on the heels of the delayed submission of the IRP. Yet, a great deal of information is missing in the CEIP due to PAC awaiting responses to their upcoming RFP. In the future, it would be appropriate for PAC (and all utilities) to conduct its CEIP planning concurrently with its Integrated Resource Plan (IRP) and CEAP, to avoid this issue.	Development of the draft CEIP has been the result of ongoing collaboration with Washington Staff, the Equity Advisory Group, the DSM Advisory Group, Low-income Advisory Group, Technical Conferences and CEIP Public Input Meetings, the first of which occurred in April 2021, concurrent with IRP portfolio development. The development of the CEIP was additionally discussed in four IRP public input meetings. The company's CEIP is also compliant with the required CEIP compliance matrix with worksheets (both public and confidential) supporting the analysis.	Comment noted
268	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	CEIP	To support transparency and accountability, it is important that the CEIP clearly convey all supporting data that PAC used to make its resource decisions for the four-year compliance period. Supporting details should be either in the CEIP or electronically linked. As much data as possible should be easily available in the CEIP and the assumptions and methodologies clearly explained so stakeholders can understand and vet PAC's process and results. The reader should not have to jump between the CEIP, the Biennial Conservation Plan (BCP), the Integrated Resource Plan (IRP), and other appendices to get a full picture of PAC's CETA compliance plan. All relevant information should be distilled and contained in the CEIP, with the other sources serving as supporting documentation in appendices.	The CEIP is a stand-alone document containing appropriate public information and references, where relevant, to public information available in other venues. As the CEIP is by rule required to be informed by the Integrated Resource Plan, the company believes such references to be helpful and appropriate. The company welcomes additional requests for information which may encompass confidential information and possibly useful information available in other public forums. The company cannot provide support in anticipation of all possible inquiries and also does not wish to limit the nature and depth of stakeholder requests for information.	Comment noted
269	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	CEIP	In general, we are disappointed to see that PAC's Draft CEIP falls short in some important respects of both the minimal requirements and our overall expectations for this first round of CEIPs. We recommend that significant changes be made to the document to ensure that the information is clearly presented and supported by analysis, and that the Final CEIP meets the requirements of WAC 480-100-640 and RCW 19.405.060. The rules at WAC 480-100-640 are very clear as to what must be included in a CEIP. There are significant shortcomings in the draft CEIP relative to the contents. Individual comments are noted in rows below.	The detailed requirements of CETA have generated many interpretations and discussions, which is appropriate in any new multi-faceted process involving many stakeholders. It is for the reason that the Draft CEIP, the compliance matrix, the public input processes and comments are important in developing a final version.	Comment noted
270	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	The CEIP lacks some specific actions, as required by WAC 480-100-650(5) and (6), and adds a fourth category of specific actions for Community outreach and engagement. In Appendix C - Specific Actions there is an unclear mix of: general categories of kinds of DR actions; a few specific actions that are a restatement of current Biennial Conservation Program (BCP) activities; a list of equity programs for which no impacts are available; and a list of renewable energy projects that were approved prior to the CEIP and are not a result of the CEIP. Much of the individual action cost and impact data is missing. PAC has explained that it cannot complete the tables and narratives required by WAC 480-100-640(5) and (6) until the results of the various RFPs have been received and analyzed. This trade-off between submitting a complete plan and waiting for RFP cycles to complete is simply a false choice, and should be remedied in the Final CEIP. The lack of complete information is inconsistent with the intent and purpose of the CEIP, and has the effect of delaying PAC's implementation of CETA for more than another year. Further, this choice by PAC places the Commission in the impossible position of reviewing a plan without a thorough understanding of those specific actions that should comprise the plan	NWECC has captured one of the many challenges of aligning the inaugural CEIP with PacifiCorp's existing planning and resource acquisition processes. For supply side options, while complete information is desirable, the company cannot present information that is currently unavailable or does not yet exist. In the case of RFP processes, the company has no basis to dictate which resources may be bid into the process and cannot dictate the best outcomes in advance of a completed analysis. The realities of long running interrelated processes is not new to the CEIP, and the company does not anticipate the need to accelerate, decelerate or skip valuable or required processes such as the CEIP, IRP, RFP, etc. For more information on how supply-side resource actions align with CETA goals, see response to 134.	Comment noted
271	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	Estimated incremental costs cannot be accurately calculated without the specific action and resource cost updates (WAC 480-100-640(7)). This information is particularly important if a utility intends to meet the compliance by relying on the 2% incremental cost compliance option at RCW 19.405.060(3)(a), because the Commission will ultimately decide whether the actions taken to comply with the standards in sections 4(1) and 5(1) allow the utility to rely on the 2% incremental cost. This alone will require a thorough understanding of each action, the underlying business case and the financial aspects of the action. Instead, it would be appropriate for the first CEIP to include the best information available to PAC for the Commission to consider at the time it is submitted, with the caveat that specific actions can be updated as the various RFP cycles are completed. The final CEIP must also justify why non-IRP modelled costs currently attributed to CETA as incremental costs would not be pursued if CETA did not exist. The non-IRP modelled costs are largely targeted to "named communities"; PAC may have realized they have those needs due to evaluations and analysis required by CETA, but the actions themselves should be undertaken even if CETA did not exist.	The existence of CETA legislation posits that there is a desire for utilities take new actions in new ways driven by new legislative rules and requirements. The company's long-term plans, in the absence of CETA, as represented by its alternative lowest reasonable cost portfolio, is already nearly 100% capable of meeting all CETA standards per WAC 480-100-610. The company's first CEIP presents moderate incremental costs that are prudent in pursuing CETA standards based on actions the company was not immediately poised to pursue in the absence of CETA legislation. In the absence of CETA legislation, the company would be largely compelled to select the alternative least-cost least-risk portfolio which would by definition be more expensive and lack CETA actions.	Comment noted
272	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	More significantly, the incremental cost calculation presented in the CEIP does not conform to either the rules or the clear intent of the legislation. PAC intentionally chose NOT to develop a CETA preferred lowest reasonable cost portfolio that incorporated the Social Cost of Greenhouse Gases (SCGHG), asserting that they are not required to do so and that other analyses came close enough. This must be corrected in the final CEIP.	Please refer to the company's response to comment number 262.	CEIP updated
273	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	CBIs	The organization of Customer benefit indicators (CBI) is somewhat confusing, with several CBIs dependent on the same metric. Nor is it clear how the CBIs relate to the proposed specific actions.	Please see the company's response to comment 258.	CEIP updated
274	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	CETA's resource prioritization is not clearly represented. RCW 19.405.040(6)(ii) and (iii) clearly identify the order of resource acquisition required of utilities under CETA. First, utilities are required to pursue all cost effective, reliable and feasible conservation and efficiency resources and demand response, then existing renewable resources, then renewable resources and energy storage before acquiring new resources per RCW 19.405.040(6)(ii) and (iii). PAC's implementation of this provision is not clearly mapped out in its CEIP.	Washington Staff also appropriately identified this shortcoming of the Draft CEIP, where alignment of supply-side resources with CETA priorities was implicit but not specified. This has been addressed in the final filing.	CEIP updated

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
275	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	WAC 480-100-660(5) and (6) present in detail how the CEIP should present the specific actions it plans to undertake in the next four years. PAC has the responses and data from the 2020 all source Request for Proposals (RFP) and the 2021 Demand Response (DR) RFP, which were confirmed as specific actions in the 2021 IRP, yet PAC has delayed the selection of specific actions until responses to a 2022 all source/targeted DR RFP are received and evaluated. This is puzzling, as the data PAC has at hand gathered from RFP responses was used to determine the 2021 preferred portfolio. The CEIP could be updated when the results from the next round of RFPs are available in 2023. If accepted as is, the CEIP will not be complete until late in 2023.	The completion of the CEIP is not inherently dependent on the final resolution of any particular specific action. There is nothing in rule or statute requiring specific actions to be time-limited or required to begin or end entirely within a CEIP cycle, and indeed such a restriction would be detrimental to Washingtonians who would be subject to actions made only on a short-term basis.	Comment noted
276	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	There are a number of actions in the CEIP that are actions PAC already undertakes, such as the conservation actions from the Biennial Conservation Plan, and the solar/wind/storage acquisitions that PAC is already undertaking. While it is appropriate for PAC to include these CETA compliant actions in the CEIP, the purpose of the CEIP is to show what they will do beyond what is already included in their baseline alternative portfolio. These actions should not be included as part of the incremental cost.	Please refer to the company's response to comment 270.	Comment noted
277	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	While the CEIP actions should be "consistent" with the twenty-year IRP and "informed" by the 10-year Clean Energy Action Plan (CEAP), that does not mean the information in the CEIP should be limited to the data from the longer-term plans (See Attached legal memo "Consistent with" in CETA from EarthJustice dated October 8, 2021). In this particular cycle, PAC's Request for Proposal(s) were issued in summer of 2020, so that the most recent cost data would have been available for this CEIP. The CEIP could have started with that information, updated after the results from the 2022 RFP are obtained.	The CEIP is based on 2021 IRP model analysis which used updated bid pricing and also confirmed the 2020 AS RFP final shortlist results. Final 2020AS RFP costs will not be known until contracts are completed and signed. Future updates to these costs will occur based on requirements, timing and availability of data.	
278	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	Demand response is one of the bright spots in the plan. While many details remain to be decided, both the very ambitious acquisition targets during the CEIP period and the range of measures, programs and rate designs indicate that the company is now taking the potential and importance of demand response and load management seriously. In addition to the overall 37.4 MW "actionable target" it would be helpful to have an estimate of the total peak load reduction for both summer and winter peaks.	Also, please refer to the company's response to comment number 266. The final CEIP includes a footnote estimating the winter and summer peak impacts associated with the target.	CEIP updated
279	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	PAC has listed how the utility has evolved its EE programming to implement CETA and reach more named communities with programming. We are hopeful that these changes will result in more PAC customers, and particularly members of named communities, receiving the benefits of conservation. As PAC continues its work with the EAG and with other stakeholders, there may be further opportunities to target EE programming to help households experiencing high energy burdens, and we look forward to working with the company to continue adaptively managing their programs.	Comments acknowledged and considered in ongoing implementation process.	Comment noted
280	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	RCW 19.405.060(2)(a)(i) requires the CEIP include interim targets for meeting the standards prior to 2030 and after, as well as specific targets for energy efficiency, demand response and renewable energy. To this list PAC has voluntarily added a specific target for Community Outreach and Engagement (COE), which is not specified in the statute. The first three categories either reduce load, reduce or eliminate peaks, or provide electricity, while the COE actions are meant to ensure named communities are not left out of existing programs. PAC should include further explanation of why a separate target for COE actions is necessary under CETA, and acknowledge which actions are required by other legislation, such as SB 5295 (2021).	PacifiCorp understands NWECC's feedback to be based on RCW 19.405.060(1)(a)(i). First, the company's COE target is linked to the requirements of RCW 19.405.040(8), which requires that the company, "in complying with this section... ensure that all customers are benefiting from the transition to clean energy. Through the equitable distribution of energy and nonenergy benefits and reduction of burdens to vulnerable populations and highly impacted communities; long-term and short-term public health and environmental benefits and reduction of costs and risks; and energy security and resiliency." Accordingly, PacifiCorp believes that it is appropriate to include the COE target in response to RCW 19.405.060(1)(a)(i), because that statute is intended to implement RCW 19.405.040(1) and 19.405.050(1). RCW 19.405.040(1) is part of the "section" discussed in RCW 19.405.040(8).	Comment noted
281	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Utility Actions	NWECC believes that it would be inappropriate to consider these proposed COE actions to be incremental costs due to CETA. While CETA may have required additional analysis and documentation to be undertaken to support these actions, they would certainly not be abandoned if CETA did not exist. Rather, these COE actions represent best practices that the utility should undertake as part of its core business of providing a public utility service in Washington state. For example, PAC already offered transportation electrification programs prior to CETA enactment, planned to continue offering them after CETA was enacted, and has received separate direction allowing them to do so under chapter 80.28 RCW. To help the program work better for named communities, PAC should engage in conversations with the Equity Advisory Group (EAG) to see if actions other than installing chargers in named communities, such as electrifying transit, or replacing internal combustion engine vehicles for low-income service providers and community-based organization, would have more impact in named communities.	With respect to the EV grant program costs, identified as CETA incremental costs in the CEIP draft, PacifiCorp agrees with NWECC and has removed those estimates from the incremental cost analysis in the final CEIP. The company believes the remaining costs identified related to the COE sections are incremental due to CETA.	CEIP updated
282	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	Chapter 4 in the draft CEIP dealing with incremental costs is a sparse five pages long, mostly arguing that PAC should not have to include the SCGHG in the Alternative Lowest Reasonable Cost portfolio (ALRC) as required by WAC 480-100-605, because PAC did not include the SCGHG in the IRP preferred portfolio nor in the CETA preferred portfolio, as PAC readily admits. This chapter must be completely revised in the final CEIP to comply with the rules in WAC 19.280.030 and WAC 480-100-660, as PAC assumes "that its petition for a limited exemption for WAC 480-100-605 will be granted" (page 66, draft CEIP) and calculates incremental costs based on that assumption. NWECC has submitted comments and a legal memo on the petition, urging it be denied.	Please refer to the company's response to comment number 262, above.	CEIP updated
283	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	PAC misses the point of the CETA requirement to apply the SCGHG when selecting resources, which is to level the playing field between resources. The selection of resources can reasonably be expected to differ from what would have been selected without incorporating the SCGHG compared to when the SCGHG is applied, as PAC acknowledges on page 68. CETA transforms how preferred portfolios are developed – preferred portfolios are now not just lowest reasonable cost portfolios but lowest reasonable cost portfolios that incorporate new planning assumptions, such as the SCGHG and equity considerations.	First, as a general matter, there are almost no differences in the Washington specific resources during the action plan window for portfolios developed under a MM-price policy scenario and one developed with the SCGHG. Please refer to the company's response to comment number 262, above.	Comment noted
284	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	The preferred portfolio developed in the IRP and CEAP is required by RCW 19.280.030(3)(c)(iii) to incorporate the SCGHG when "evaluating and selecting intermediate and long-term resource options". The CEIP, in turn, must identify specific actions (in other words the selected portfolio) that are consistent with the utility's long-range IRP (RCW 19.405.060(1)(b)(iii)). By not considering the SCGHG in either the IRP or the CEIP, the selected portfolio is not compliant. PAC selected a portfolio, which does not account for the SCGHG, then requested a waiver from the requirement to include the SCGHG in the alternative portfolio. Both portfolios fail to comply with the statute and rules and contradict the intent of the law, which was to account for the externalized costs of fossil fuels, as part of the transformation of the electric system.	Please refer to the company's response to comment number 262.	CEIP updated
285	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	PAC argues that the CEIP does not explicitly require the preferred portfolio to consider the SCGHG, but General Order R-601 (Docket UE-191023 and Docket UE-190698), paragraphs 37 and 38, make it abundantly clear the SCGHG should be included in the CEIP preferred portfolio as well as the alternative portfolio (emphasis added):	Please refer to the company's response to comment number 262.	CEIP updated
286	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	37. The variety of proposals demonstrates the lack of statutory direction concerning the incorporation, or modeling, of the SCGHG emissions in IRPs. Accordingly, the rules we adopt by this Order do not require a specific modeling approach at this time. Rather, as we discuss further below in Section III.F.2, the proposed rules require that the utility include the SCGHG emissions in the alternative lowest reasonable cost and reasonably available portfolio for calculating the incremental cost of compliance in the CEIP. How the utility chooses to model the SCGHG emissions in its preferred portfolio in the IRP will inform its CEAP and ultimately its CEIP. The utility must provide a description in its CEIP of how the SCGHG emissions are modelled and incorporated in its preferred portfolio.	Please refer to the company's response to comment number 262.	CEIP updated
287	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	38. Utilities should also consult with their advisory groups regarding how to model the SCGHG in their IRP, CEAP, and CEIP. If a utility treats the SCGHG as a planning or fixed cost adder in its determination of the optimal portfolio, including retirements and new plant builds, we expect the utility to model at least one other scenario or sensitivity in which the SCGHG is reflected in dispatch. Similarly, if a utility incorporates the SCGHG in modeling dispatch costs, we expect the utility to provide an alternative scenario or sensitivity analysis, such as the planning adder approach, to determine the optimal portfolio, including retirements and new builds. Such modelling will help to inform how best to implement CETA's requirement to include the SCGHG emissions as a cost adder.	Please refer to the company's response to comments number 262 and number 267.	CEIP updated

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
288	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	132.In enacting CETA, the Legislature both amended Chapter 19.280 RCW and created Chapter 19.405 RCW. The IRP and CEIP processes are closely interrelated. The most reasonable statutory interpretation is that the term "lowest reasonable cost" has the same general meaning in both statutes. Finally, although the phrase "social cost of greenhouse gas emissions" appears only in RCW 19.280.030, the calculation of cost for greenhouse gas emissions, including the effect of emissions, applies throughout CETA. This is yet another indication that SCGHG was intended to have implications outside of the IRP. The proposed rules, therefore, define the baseline portfolio's reference to "lowest reasonable cost" to include the SCGHG in the same manner required under Chapter 19.280 RCW.	Please refer to the company's response to comment number 262.	CEIP updated
289	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	Incremental Costs	The Commission's Order makes clear that the question is not "should the SCGHG be considered" in the CEIP, but "how it should be calculated". The Commission did not suggest that including the SCGHG may be optional. This is simply contrary to the statute. While PAC has faced significant modeling challenges during this planning cycle, we are confident that their team is up to the task of creating both a preferred portfolio and an alternative portfolio that includes the SCGHG. As for the costs used in the calculation, the draft CEIP shows an abrupt increase in expenditures for both power costs and energy efficiency in the last two years of the CEIP period (page 68), without detailed explanations of either the assumptions underlying the expenditures or the actual costs; both need to be fully described in the final.	Please refer to the company's response to comment number 262.	CEIP updated
290	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	CBIs	NWECC, The Energy Project, Front and Centered, and the Public Counsel Unit of the Washington Attorney General's Office joined together as Joint Advocates to develop a draft list of Customer Benefit Indicators (CBIs) early in the summer. The Joint Advocates initially shared this list with the companies and stakeholders in late July 2021, and met with PAC in mid-November, after the filing of the draft CEIP to discuss the proposed CBIs. NWECC agrees with the comments submitted by The Energy Project (TEP) to this docket and to PAC, particularly the concerns raised about creating a CBI that focuses on reducing 90+ day arrearages, taking a more proactive stance to promote greater access to and control over renewable resources for low income and vulnerable populations, expanding the CBIs to include improved health outcomes, and revising the utility credit code scoring to reduce the number of customers with low utility credit code problems.	PacifiCorp is continuing the long term payment plans offered during the pandemic. In addition, the company will be working with the Low Income Advisory Board to investigate and develop an Arrearage Management Program in 2022. The Arrearage Management Program will directly target assistance for customers with long term arrears. Associated CBIs will be developed and outlined as part of the program.	Comment noted
291	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	CBIs	The approach to weighting the CBIs needs to be re-examined in the final CEIP. The results of the weighting process in the draft CEIP resulted in some very close ratings and some very useful metrics were left out.	Please refer to the company's response to comment number 249.	Comment noted
292	2021-12-03	Northwest Energy Coalition (NWECC)	Docket UE-210829	CBIs	The final CEIP should much more clearly explain how the CBIs will be used to evaluate all resource choices, as a central purpose of the CBIs is to monitor and track performance related to CETA and how specific actions are shaped by the CBIs. For example, the draft states on page 47 "...the 2020AS RFP resources are primarily located outside of Washington, and therefore, the other CBIs related to highly impacted communities and vulnerable populations are not applicable", yet acquiring renewables to replace natural gas facilities would have a positive regional impact on air quality, which affects all customers. The interactions of CBIs with resource choices needs to be more fully developed.	Please refer to the company's response to comments number 255 regarding pollution burden and pollution exposure and indoor air quality, 258 regarding the updated CBI/action mapping explanations, and 337 regarding decisions about supply-side resources.	Comment noted and CEIP updated
293	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	PacifiCorp's CEIP details the utility's plans to begin its shift to providing fully carbon-free energy to Washington state consumers by 2045 and specifically covers the period from 2022- 2025. While the draft CEIP demonstrates that PacifiCorp has done some work to include equity considerations in their transition plan, the proposed planning document still has some major areas for improvement. As part of their planning, PacifiCorp has generated Customer Benefit Indicators (CBIs) to ensure this transition is equitable. Front and Centered is primarily concerned that the selected CBIs are minimalist in nature, lack definitional clarity, and generally do not meet the standards required by statute to equitably distribute benefits and reduce burdens for highly impacted communities and vulnerable populations.	Please refer to the company's response to comment number 251.	Comment noted
294	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	While UTC rules require at minimum eight (8) CBIs, Front and Centered reads the statutory requirement to call for utilities to develop well more than this base number. Yet PacifiCorp has proposed only nine (9) indicators, at least one of which Front and Centered believes is double counted. Further, based on PacifiCorp's draft CEIP, which details how it came to select the proposed CBIs, Front and Centered is concerned that PacifiCorp may be attempting to prioritize certain equity categories above others, which directly clashes with the equal attention given to each category by the CETA statutes and regulations.	Please refer to the company's response to comment number 251 and 249.	Comment noted
295	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	Even with the CBIs that have been selected, PacifiCorp's draft CEIP does little to explain how the utility understands the CBIs to function and does not provide the necessary clarity for the public to meaningfully engage with the proposed indicators. While PacifiCorp has done a good job of including baseline data for the selected CBIs, Front and Centered urges the utility to develop its baseline data further and to include the utility's targets for improvement.	PacifiCorp understands CBIs to be the outcomes resulting from actions taken by the company to address customer challenges. As a result of the actions put forth in the Final CEIP, it is expected that improvements in the CBI metrics will be evident over time. In this inaugural CEIP, PacifiCorp is conducting a baseline assessment of the metrics and will leverage a track record of data to determine future targets for improvement.	Comment noted
296	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	Finally, while PacifiCorp's draft CEIP includes proposed specific actions that the utility will take to comply with the statutory requirements of CETA, the draft CEIP does not connect these proposed actions with the CBIs that they are meant to link with. This lack of connection makes it difficult for the public to understand exactly how PacifiCorp has included equity considerations in their planning.	Please refer to the company's response to comment number 258, above.	CEIP updated
297	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	We recommend the following for the CEIP: 1. Develop more CBIs, including those suggested by the Joint Advocates, to better comply with the legislative intent of CETA. 2. Include more detailed baseline data and set forth targets for the utility as it moves forward in its equitable transition to clean energy. 3. Refine the CBIs to include a greater depth of understanding about what they mean, and to which populations, as well as a wider breadth of energy and non-energy impacts with clear long- and interim- term targets. 4. Provide greater clarity around the methodology used when developing the proposed Specific Actions from the proposed CBIs.	1. Please refer to the company's response to comment number 251. 2. Regarding baseline data please refer to the company's response to comment number 299 and regarding targets, please refer to the response to comment number 295. 3. Regarding understanding CBI meaning, please refer to response to comment number 295. For populations impacted by CBIs please see "Table 2.7 -- CBI to Benefit Category Mapping" in the final CEIP. 4. Please refer to response to comment number 258.	Comments noted and CEIP updated
298	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	[Statutory Requirements from RCW 19.404.040(8) and 19.405.040(8) removed] The above-stated requirements from the UTC are simply base guidelines—they set a floor, but not a ceiling. Instead, the language of the rules explicitly leaves open the possibility of more than eight CBI areas. Front and Centered would thus urge PacifiCorp to take guidance from the statutory elements contained in RCW 19.405.040(8), rather than minimally complying with WAC 480-100-640(8). The statutory categories, as listed above, would draw out a more detailed analysis from utilities when considering the impact of proposed plans. Namely, the statutory elements (1) draw out the distinctions between vulnerable populations and highly impacted communities and (2) require both short-term and long-term analysis of public health and environmental benefits and costs.	Please refer to the company's response to comment number 251. PacifiCorp believes it is in compliance with RCW 19.405.040(8) and WAC 480-100-640 (4). Regarding the distinction between vulnerable populations and HICs, please refer to the section on Baseline Metrics in Chapter 2 that distinguishes named communities from all customers, as well as "Table 2.7 -- CBI to Benefit Category Mapping" in Chapter 2, which indicates the customer segments to which the benefit categories flow.	Comment noted
299	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	Front and Centered applauds PacifiCorp for its attention to this detail in some of its presentation of baseline data in its draft CEIP. Tables 2.16 and 2.17 demonstrate the importance of gathering data for both highly impacted communities and vulnerable populations to draw out the distinctive issues that each may be facing and provide the public with insight into how well a proposed action plan may result in substantive change. Nevertheless, there is a noticeable lack of separation of data for most of the rest of the document, both in baseline data presentation and in narrative format. See, e.g., pages 43-44, noting that "PacifiCorp identified wood heating, and its associated indoor air quality impacts, as a public health threat for vulnerable populations in the Washington service area" but then continuing only to provide data for highly impacted communities. By not incorporating such findings, PacifiCorp may be overlooking notable areas where the utility could be making an equitable transition even more of a reality.	Where data were available, PacifiCorp has updated the baseline metrics within the Final CEIP to illustrate findings for both vulnerable populations and HICs. The number of households using wood as a primary or secondary heating source for vulnerable populations has been provided in Table 2.21.	CEIP updated
300	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	Further, drawing out distinctions between short-term and long-term public health and environmental benefits and costs will help PacifiCorp to both better plan for the immediate future and set longer-term goals. While Front and Centered recognizes that the CEIP is meant to be an intermediate-step focused document, Front and Centered also urges PacifiCorp to detail what its long-term environmental and public health goals are. Such detailing will aid both PacifiCorp and the public in determining which intermediate steps will be most effective in achieving long-term goals. Further, setting at least two distinct CBIs, one short-term and one long-term, will allow for a more wide-reaching and yet simultaneously targeted approach to an equitable transition.	In this inaugural CEIP, PacifiCorp has attempted to establish a solid data baseline upon which it will continue to build. Additionally, please see the company's response to comment numbers 251, 255, 295.	Comment noted

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Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
301	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Finally, it is important to recognize that the consideration and reduction of burdens applies to all areas of analysis, and thus should be a major part of the CBI drafting process. The statute calls for the reduction of burdens with consideration to highly impacted communities and vulnerable populations, as well as an analysis of the ways a utility may reduce the costs of its actions on both public health and the environment. However, both the UTC WACs and PacifiCorp's Draft CEIP only consider reduction of burdens generally as a category of CBI, rather than as an interwoven design throughout all other areas.</p> <p>(2) Of the CBIs chosen, there is little rationale demonstrated why any single one was better than another proposed or why prioritization was required. As part of its Draft CEIP, PacifiCorp included a table (Table 2.5) which detailed the prioritization of proposed CBIs based on a weighted score. The score was determined through a ranking done by PacifiCorp's Equity Advisory Group (EAG). This data, in and of itself, is useful feedback from the EAG to PacifiCorp. However, the highest-ranking CBI is not the only CBI that could, or should, be chosen. As noted above, there is nothing limiting PacifiCorp to selecting only one CBI per category. For instance, why, when there is only a 0.3 difference in score, was only "Increase in renewable energy resources" selected as an environmental CBI, and not "Lower Greenhouse Gas emissions?" Surely both are goals that PacifiCorp strives to meet. Similarly, the same could be said of the two highest ranking proposed CBIs for Energy Resiliency/Risk Reduction, where the difference between the two was only 0.2—it is important both for PacifiCorp to reduce the frequency and duration of energy outages while simultaneously supporting customer programs related to community resiliency.</p>	<p>PacifiCorp recognizes that many of our CBIs will touch more than one benefit category. Similarly, many of our proposed specific actions address more than one CBI. Additionally, the EAG identified households experiencing high energy burden as a vulnerable population and the proportion of energy burdened customers (within different segments, including among named communities) is also a metric proposed to measure that CBI. PacifiCorp understands and recognizes it will be addressing reduction of burdens in a holistic way in this CEIP.</p> <p>The process that was used for the selection of CBIs is described in Section 2 of the CEIP. In reference to the example cited in this comment, PacifiCorp adopted a CBI to track renewable energy resources AND emissions which covers both the category of increasing renewable energy resources and lowering greenhouse gas emissions. As described in the company's response to comment 251, we view these CBIs as a starting point in this inaugural CEIP and will continue to review and refine them throughout the 4-year implementation period and beyond.</p>	Comment noted
302	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Further, as The Energy Project noted in its comments on this Draft CEIP, there is no requirement in CETA for a utility to rank prioritization between CBI categories. In fact, it seems contrary to the general spirit of CETA's equity mandate, which does not elevate any one category above another. As such, while Front and Centered understands the desire to gather data and applauds PacifiCorp for soliciting public feedback on proposed CBI categories, Front and Centered is concerned that PacifiCorp, along with the other IOUs, has seemingly chosen to prioritize some CBI categories over others.</p> <p>(3) CBI presentation is confusing, lacks definitional clarity, and there is at least some overlap between proposed CBIs. Front and Centered echoes the comments submitted by The Energy Project on this Draft CEIP regarding PacifiCorp's chosen method to present their CBIs. Organizing CBIs by benefit category, rather than ascribing multiple benefit categories to each CBI, would help ensure that readers can understand exactly where PacifiCorp is prioritizing its attention.</p>	<p>Please refer to the company's response to comment number 249.</p> <p>Please refer to the company's response to comment number 248 and 258.</p>	Comment noted
303	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Front and Centered is also concerned with PacifiCorp's decision to only include a singular CBI that it claims touches on the categories of energy resiliency and risk reduction. Front and Centered interprets WAC 480-100-640(4) to call for a separate CBI for each listed category. While PacifiCorp has nine (9) listed CBIs to the eight (8) listed categories, this double counting should not be overlooked.</p>	<p>Please refer to the company's response to comment number 248 and 258.</p>	Comment noted
304	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Further, when describing their chosen CBIs, PacifiCorp's explanations often do not go beyond a simple restating of the CBI itself. For instance, on page 37 of the Draft CEIP, PacifiCorp describes the purpose of their "Community-Focused Efforts and Investment" CBI as "focus[ing] investments so that communities more equitably receive benefits." They then describe the metrics that they will use to measure the CBI, though they never exactly state what they define as "efforts" nor "investments."</p>	<p>The metrics that PacifiCorp plans to track (workshops & diverse headcount) describe the efforts and investments that PacifiCorp will be making to support this CBI.</p>	Comment noted
305	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Front and Centered calls on PacifiCorp to provide more detail as to how exactly it understands the CBIs it is proposing. Only through providing more detail can the public hold PacifiCorp accountable to its stated intentions.</p>	<p>PacifiCorp has included additional detail in Chapter 2 to provide clarity on the development of CBIs and their relationship to specific actions. Additionally, please refer to the company's response to comment number 295.</p>	CEIP updated
306	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>(4) The lack of connection between proposed specific actions to CBIs also makes it difficult to analyze the efficacy of the actions proposed by PacifiCorp. Front and Centered further echoes the points raised by The Energy Project in its comments on this draft CEIP regarding the lack of explicit connection between PacifiCorp's proposed specific actions and the stated CBIs. Front and Centered believes that CBIs should be utilized by utilities to guide the choice of specific actions taken. As a result, CBIs must first be clear and detailed, both so that the utility can demonstrate an understanding of what is often an idea promoted by the utility's EAG. Further, by clearly articulating what exactly the CBI is, the utility will necessarily also include what its target goal is, and thus aid both the UTC and the public in holding the utility accountable.</p>	<p>Please refer to the company's response to comment number 258.</p>	CEIP updated
307	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Clear articulation of CBIs also allows for greater public input (and thus greater self-governance) by communities who would be affected by proposed specific actions. As part of an equitable transition to clean energy, Front and Centered believes that communities must be given the opportunity to meaningfully influence the decision-making of the utilities that provide them services. The only way that communities can effectively provide such feedback is through utilities providing clear statements of their intent.</p>	<p>PacifiCorp takes this responsibility seriously. Through the EAG and other advisory groups as well as other means of public participation, PacifiCorp is providing its communities with opportunities to meaningfully engage in the development of its programs.</p>	Comment noted
308	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Similarly, baseline data provides yet another opportunity for utilities to clarify their intent regarding the transition to clean energy. By providing clear baseline data, a utility is necessarily required to reflect on its current and historical actions, as well as reckon with its potential capacity for growth. Front and Centered applauds PacifiCorp for the level of detailed baseline data provided in its draft CEIP but notes that there is still room for improvement. For instance, Table 2.10, which represents a headcount of staff that support program delivery in Washington that PacifiCorp has classified as diverse in some way is not helpful without context. Front and Centered suggests that PacifiCorp include details such as the general availability of eligible candidates in the hiring pool (i.e., workforce availability) and break down the employee status (e.g., craft, non-craft, managerial, executive). Further, for those baseline data points that PacifiCorp states are "in progress," Front and Centered urges PacifiCorp to describe its proposed methods for data collection.</p>	<p>PacifiCorp agrees that tracking these metrics over time will shed light on the degrees to which the specific actions "move the needle" on the CBIs. PacifiCorp has updated all "in progress" placeholders to reflect the additional data and analysis it was able to obtain following submission of the draft. PacifiCorp will continue to research, update, and refine all available data sources during the implementation period.</p> <p>Specific to Table 2.10 (headcount of support staff), the data in Table 2.10 is the most granular PacifiCorp is able to provide at this time. Future contracts for program delivery may generate additional information similar to that suggested by Front and Centered.</p>	Comment noted
309	2021-12-06	Front and Centered	CEIP Mailbox	CBIs	<p>Front and Centered also suggests that PacifiCorp use its baseline data presentation as a location for setting soft goals for itself (i.e., target numbers). In doing so, PacifiCorp would be able to demonstrate how committed it is to its stated goals, as well as provide yet another point where both the UTC and the public can help to hold the utility accountable.</p>	<p>PacifiCorp believes that it is important to make sure that it is collecting the right data points and that the data is useable and reproducible over time so that it can begin to measure trends over time before establishing target numbers.</p>	Comment noted
310	2021-12-06	Front and Centered	CEIP Mailbox	Metrics	<p>WUTC Staff recommend issuance of an order denying Pacific Power & Lights's petition on 11/1/2021 requesting an exemption from WAC 480-100-605, requiring the Company's "alternative lowest reasonable cost and reasonably available portfolio" to include the social cost of greenhouse gases "in the resource acquisition decision."</p>	<p>Please refer to the company's response to comment number 262.</p>	CEIP updated
311	2021-12-06	Front and Centered	CEIP Mailbox	Metrics	<p>Renewable Northwest recommends denial of PacifiCorp's petition for an exemption from WAC 480-100-605 which provides that "[t]he alternative lowest reasonable cost and reasonably available portfolio" for purposes of determining the social cost of greenhouse gases in the resource acquisition decision" because it is neither legally appropriate nor in the public interest.</p>	<p>Please refer to the company's response to comment number 262.</p>	CEIP updated
312	2021-12-09	WUTC Staff	Docket UE-210829	Incremental Costs	<p>The Washington Attorney General recommends denial of PacifiCorp's petition for an exemption from WAC 480-100-605 which provides that "[t]he alternative lowest reasonable cost and reasonably available portfolio" for purposes of determining the social cost of greenhouse gases in the resource acquisition decision" because it is a statutory obligation that must be implemented through Commission rule and order, and the incremental cost calculation is a crucial aspect of the CEIP.</p>	<p>Please refer to the company's response to comment number 262.</p>	CEIP updated
313	2021-12-06	Renewable Northwest	Docket UE-210829	Incremental Costs	<p>PacifiCorp's draft CEIP indicates the Company has petitioned the Commission to modify its rule that the alternative LRC and reasonably available portfolio not include the SCGHGs as a cost adder. However, PacifiCorp's petition sidesteps the reality that the Company's CEIP LRC portfolio must also include the SCGHGs to comply with Washington's Clean Energy Transformation Act (CETA). In describing its CEIP incremental cost methodology, PacifiCorp acknowledges its 2021 IRP solution or preferred portfolio "was not developed to use the SCGHGs in the resource acquisition decision." Yet the Company maintains its 2021 IRP preferred portfolio complies with CETA requirements. Staff respectfully maintains a plain reading of the law requires "an electric utility [to] incorporate the SCGHGs as a cost adder when evaluating and selecting...resource options." Staff presents its rationale for opposing PacifiCorp's SCGHG Petition in greater detail in Staff's legal response.</p>	<p>Please refer to the company's response to comment number 262.</p>	CEIP updated
314	2021-12-06	Public Counsel	Docket UE-210829	Incremental Costs			
315	2021-12-10	WUTC Staff	E-mail to IRP Team	Modeling			

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
316	2021-12-10	WUTC Staff	E-mail to IRP Team	Modeling	During PacifiCorp's 2021 IRP development process, the Company maintained during its public interest meetings that the SCGHG price-policy assumptions made as part of its portfolio generation were "consistent" with Washington CETA planning requirements. Staff strongly recommends PacifiCorp re-run its 2021 IRP preferred portfolio as well as its alternative LRC and reasonably available portfolio to appropriately incorporate the SCGHGs as a cost adder ahead of the Company filing its final CEIP by January 1, 2022. Given the significant portfolio cost increase incorporating the SCGHGs would likely impart, Staff believes correctly applying this cost adder could result in resource differences during the 2022 – 2025 CEIP compliance period beyond just Washington demand-side management (DSM) selections as the Company maintains. Further, Staff notes the Commission's rules allow PacifiCorp to propose an alternative incremental cost methodology that does not equate the LRC portfolio to the Company's docketed 2021 IRP solution as long as the proposed IC portfolio comparison costs carbon emissions, as outlined in CETA.	Please refer to the company's response to comment number 262.	CEIP updated
317	2021-12-10	WUTC Staff	E-mail to IRP Team	Modeling	PacifiCorp's modeling also falls short beyond the Company's treatment of the SCGHGs, or lack thereof. A disconnect exists between PacifiCorp's modeling of its interim targets between 2021 through 2040 and how the Company calculates its target setting during the final five-year 2041-through-2045 period. The linkages between PacifiCorp's 2021 IRP portfolio development and its interim target setting through 2040 are clear. However, PacifiCorp's 2021 IRP only covers the 2021 – 2040 twenty-year time horizon. The Company's draft CEIP workpapers demonstrate PacifiCorp only applied a linear interpolation of its 21 IRP preferred portfolio to calculate its 2041 through 2045 targets. Staff observed no attempt by PacifiCorp to optimize these linearly extrapolated results to achieve a LRC solution, as required per rule.	The optimization of years 2041-2045 in the CEIP was conducted in the IRP's optimization of years 2021-2040, which comprises the best available data for optimizing outcomes both during and beyond a twenty year planning window. The linearly extrapolated results are already optimal. The optimization of the final five years using a different methodology based on increasingly speculative data will not impact the company's ability to achieve full compliance in any of those years, nor will it reduce the costs of compliance. This is because no resources are added beyond year 2030 in order to achieve CETA interim targets, and the resources selected through 2040 are driven by system requirements that exist in the absence of CETA legislation. The only possible change would be the addition of incremental resources driven by non-CETA obligations, and therefore not applicable to the incremental cost of CETA. Also, the Draft CEIP relied on extrapolation to achieve CETA standard by 2045 whereas the final CEIP does not. This is because 100 percent renewable compliance is achieved by 2038 due to improving the interim cost calculation to be based on Washington retail sales rather than using retail load as a proxy.	Comment noted
318	2021-12-10	WUTC Staff	E-mail to IRP Team	Modeling	PacifiCorp's decision to optimize a resource portfolio through 2040 and not 2045 stands in marked contrast to the modeling decisions and underlying analytics that inform both Avista Corporation's (Avista) and Puget Sound Energy's (PSE) CEIP clean energy transformation standard target setting. Staff raised the issue that PacifiCorp's 2021 IRP planning horizon would not cover the relevant CETA targets (e.g., 2045 100 percent clean electricity standard) at the Company's very first public interest meeting, yet PacifiCorp failed to adjust its modeling approach. Staff strongly encourages PacifiCorp to re-run its CEIP portfolio development to optimize 2041 through 2045 results that are in fact LRC ahead of filing its final CEIP by January 1, 2022. If time constraints make this path forward infeasible, at minimum, PacifiCorp should undertake a portfolio development approach that satisfactorily addresses the entire Washington CETA planning time horizon through 2045 as part of its next IRP two-year progress report and biennial CEIP update.	The company's modeling approach is already optimized. Please see the response to comment number 317.	Comment noted
319	2021-12-10	WUTC Staff	E-mail to IRP Team		PacifiCorp needs to do a better job in its CEIP explaining what expenditures should inform and, similarly, what costs should be excluded from its projected IC calculation. Staff are concerned PacifiCorp may be significantly underestimating the investments and expenses that are directly attributable to actions necessary to comply with, or make progress towards CETA's greenhouse gas neutrality and 100 percent clean electricity standards. PacifiCorp did not include any of these procurement costs in its projected IC calculation, as the Company maintains the significant renewable energy procurement it has pursued via its 2020 All-source Request for Proposals (RFP) depended on previous planning (i.e., PacifiCorp's 2019 IRP) and would have occurred regardless of CETA. However, Staff's review of the Company's CEIP supporting files confirms the CETA compliant renewable energy resources allocated to Washington more than double (i.e., increase approximately 138 percent) during the 2022 through 2025 compliance period. This significant ramp up appears directly attributable to PacifiCorp's strategy to meet its 2030 interim target. Staff questions whether PacifiCorp would have made these renewable energy allocation choices to its Washington service territory in the absence of CETA's 2030 and 2045 targets. In comparison, assumptions made by Washington's other two electric IOUs in calculating their respective projected IC calculations do suggest such electricity operation and delivery costs should be considered directly attributable expenses. Furthermore, stakeholders consulted agree that allocation activities should be considered in the Company's projected IC calculation.	The company has expanded its explanation of incremental costs in narrative and has included additional workpapers. Please refer to Chapter 4 and Appendix D. The ramp up of renewables described by Staff during the 2022-2025 period is in no way driven by CETA. The company made these resource decisions on a least-cost least-risk basis prior to the development of CETA rules and notably did not model any CETA requirements in its 2019 IRP. No calculation of interim targets occurred prior to the 2021 IRP, the first IRP to which CETA legislation applies. These resources were included in the 2021 IRP as planned and not proxy resources because the RFP FSL analysis had already been completed. Chapter 9 of the 2021 IRP includes two alternative sensitivities (P02c and P02d) measuring the impacts of removing 2020AS RFP FSL resources to test whether or not these resources remain economic with updated analysis. The results of these studies demonstrated the continuing economics of these pre-CETA decisions. The relevance of these resource to CEIP compliance is that while the company cannot retroactively apply CETA legislation to actions already taken, the company can consider CETA legislation to the extent possible in future actions as these resources are developed.	CEIP updated
320	2021-12-10	WUTC Staff	E-mail to IRP Team	Incremental Costs			
321	2021-12-10	WUTC Staff	E-mail to IRP Team	Modeling	If Washington's 2030 and 2045 targets were no longer modeling constraints, and the renewable energy allocated to the state remained the same, then it would confirm that such a significant increase in renewable energy allocated to Washington during the 2022-25 timeframe would have occurred regardless of requirements pursuant to RCW 19.405.040 and RCW 19.405.050. Staff strongly recommends that PacifiCorp provide evidence, in the form of easily accessible modeling support files, that confirm the Company's assertion that Washington's resource allocation would remain the same regardless of CETA's greenhouse gas neutrality and 100 percent clean electricity requirements. If modeling results without the RCW 19.405.040 and RCW 19.405.050 constraints reflect a significantly different 2022 – 25 renewable energy allocation, Staff would expect PacifiCorp's final CEIP would reflect a greater net power cost contribution to its projected IC calculation.	Washington's 2030 and 2045 targets were not modeled in the development of non-CETA compliant portfolios. In addition to applying the results of the Demand Response RFP and energy efficiency derived from the application of SCGHG to Washington outcomes, CETA compliant portfolios required only a small renewables addition in a single year to achieve CETA targets. This is as anticipated and discussed with Staff during the development of the 2021 IRP. The small 2030 hybrid resource addition was the optimal resource addition to serve Washington customers within existing transmission interconnection constraints. Staff has full access to the company's modeling and can observe that no CETA targets were applied (and in fact all but completely already met).	Comment noted
322	2021-12-10	WUTC Staff	E-mail to IRP Team	Modeling	In terms of "net power costs," PacifiCorp should also explain in its final CEIP what actions or programs constitute these costs as categorized in Table 4.1. Staff found no explanation of this directly attributable cost category within the Company's draft CEIP nor within the Company's confidential revenue requirement workpaper.	The "Net Power Costs" category represents the complete system-wide impacts on operations driven by portfolio changes, and is calculated based on detailed data provided in "Cost Summary Compare P02-MMGR-CETA less P02-SCGHG-MM.xlsx". The PLEXOS model optimizes dispatch and operational costs of each portfolio and the differences in resulting costs between one portfolio and another are tabulated annually in categories meaningful for analysis. Therefore, there is no action or program defined as "decrease generation and therefore fuel costs of resource X", for example.	CEIP updated
323	2021-12-10	WUTC Staff	E-mail to IRP Team	Incremental Costs	While PacifiCorp does provide a projected IC calculation and proposes directly attributable costs, the Company's justifications for these costs and, more importantly, the informing data are opaque. The total 2022 – 25 projected ICs are not clearly presented as a separate and distinct calculation stymying Staff from making a compliance determination. It is not explicitly stated how the incremental costs (either modeled or non-modeled) remain below the threshold value. The Company must present on a yearly basis what the incremental costs are in their totality, including all categories (i.e., modeled and non-modeled) that are applicable to compare to the annual threshold amount. PacifiCorp must provide supporting data and results calculations, with formulas intact.	The company has enhanced workpapers and appendices submitted with the CEIP to provide further insights on the sources informing the incremental costs estimates. As well, formula capabilities have been reviewed to ensure to the extent possible, results of calculations are supported by relevant data sources, process descriptions, references to other regulatory filings and/or workpapers to provide better transparency for incremental cost evaluation.	CEIP updated
324	2021-12-10	WUTC Staff	E-mail to IRP Team	Incremental Costs	Additionally, PacifiCorp should identify the sourcing information for Table 4.3, Estimated Annual Revenue Requirement. Staff understands the numbers in this table come from confidential workpapers. Key data is simply "hard coded" within this workbook, including the pre-tax rate of return – 8.409% (cell C32, "Revenue requirement" tab), net power costs and energy efficiency ("IRP costs" tab), as well as all non-IRP costs. Similarly, PacifiCorp should appropriately source Table 4.4, Cost thresholds. Staff were unable to locate any corresponding workpaper for this table and specifically wonder how the forecasted Washington revenues were derived for 2021 – 2024.	The company will enhance workpapers and appendices submitted with the CEIP to provide further insights on the sources informing the incremental costs estimates. As well, formula capabilities will be reviewed to ensure to the extent possible, results of calculations are supported by relevant data sources, process descriptions, references to other regulatory filings and/or workpapers to provide better transparency for incremental cost evaluation.	CEIP updated
325	2021-12-10	WUTC Staff	E-mail to IRP Team	Incremental Costs	To assist with data accessibility, both within this incremental cost section of the CEIP and throughout the implementation plan, Staff recommends PacifiCorp at least source the parallel workstreams from which relevant costs are derived (e.g., PacifiCorp's 2019 general rate case and 2022-23 biennial conservation plan).	The incremental cost methodology for DSM equity and the relationship between the base case (delivery of the EIA volume regardless of equity) and the equity adders required by CETA are outlined in the incremental cost work papers.	

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
326	2021-12-10	WUTC Staff	E-mail to IRP Team	Supporting Analyses	As part of its draft CEIP review, Staff has prioritized evaluating whether electric IOUs have made available underlying inputs, data, and assumptions in an easily accessible format that would enable the "Commission, Staff, ...and other parties...to understand why the [companies] took the actions [they] did." For example, PacifiCorp did include as confidential support files, spreadsheet workbooks derived from the Company's 2021 IRP PLEXOS results supporting its interim target setting through 2040 (not 2045) and incremental cost portfolio results (albeit using a medium carbon price rather than the SCGHG). PacifiCorp did not properly source or document how it determined its specific targets (i.e., renewable energy, energy efficiency, demand response) nor its corresponding specific actions. As part of its final CEIP filing, PacifiCorp needs to file native file format versions of its specific target and specific actions data. Such results need to be properly sourced and/or justified.	The company has filed additional workpapers as part of its final filing and in consideration of parties' comments.	CEIP updated
327	2021-12-10	WUTC Staff	E-mail to IRP Team	Supporting Analyses	Staff notes PacifiCorp's CEIP report narrative is largely "decoupled" from what underlying data files the Company has included as part of this draft CEIP filing. The reader must instead search through the suite of files provided, using filenames as their primary guide. PacifiCorp has not provided any master data file "index" as an appendix to its CEIP. Staff believes such an index or data "table of contents" type document would greatly increase the level of CEIP data accessibility the Commission envisioned. For its final CEIP, PacifiCorp should: (a) Specifically link its frontmatter report to the underlying data files that inform the various targets, charts, and tables in the report. An appropriate way to accomplish this goal is for PacifiCorp to footnote specific supporting workpaper cells and/or tabs within its report narrative. (b) Include a master data file "index" as a CEIP chapter or supporting appendix. At minimum, the Company should organize its final CEIP deliverable by including a master table of contents, readme files, and categorically grouping related data. For comparison, the Commission added a similar requirement as a condition for PacifiCorp's 2021 IRP. reader must instead search through the suite of files provided, using filenames as their primary guide. PacifiCorp has not provided any master data file "index" as an appendix to its CEIP. Staff believes such an index or data "table of contents" type document would greatly increase the level of CEIP data accessibility the Commission envisioned.	The company has composed an appendix of workpaper references and is also providing workpaper references as footnotes in the main CEIP document.	CEIP updated
328	2021-12-10	WUTC Staff	E-mail to IRP Team	Supporting Data	Further, PacifiCorp's specific actions tables (i.e., Appendix C) lack any sourcing information nor links specific action project and program attributes back to underlying files that contain the relevant capacity, energy, or cost data. Staff must resort to spot checking PacifiCorp's proposed specific actions or otherwise trust this table is consistent with the Company's planning efforts, namely its 2021 IRP results. As part of its final CEIP, PacifiCorp must file a specific actions Appendix C in native file format (i.e., Excel workbook format) that appropriately links quantitative attributes (i.e., capacity, energy, and projected cost details) to the underlying planning source files per rule. Filing its specific actions data in a more easily accessible format will enable Staff to better assess whether PacifiCorp's CEIP specific actions appropriately align with the Company's 2021 IRP. Further, PacifiCorp's specific actions tables (i.e., Appendix C) lack any sourcing information nor links specific action project and program attributes back to underlying files that contain the relevant capacity, energy, or cost data. Staff must resort to spot checking PacifiCorp's proposed specific actions or otherwise trust this table is consistent with the Company's planning efforts, namely its 2021 IRP results.	The company has added a column in Appendix C to indicate general sourcing information as well as workpaper references relevant to specific tables and information within the CEIP document itself. Please also refer to the company's response to comments 326 and 327.	CEIP updated
329	2021-12-10	WUTC Staff	E-mail to IRP Team	Supporting Analyses	Staff echoes stakeholders' claims that PacifiCorp needs to provide more of an explanation and justification of its supporting 2021 IRP analyses to help interested parties understand why the Company is highlighting various interim and specific target setting measures in its CEIP. For example, PacifiCorp is planning to remove Jim Bridger from Washington customer rates by the end of 2023, even though the Company is planning to convert Bridger to a natural gas-fired plant. PacifiCorp's CEIP has not included any analysis to support this decision. It is in the Company's interest to provide easily accessible supporting data, which will assist the Commission and interested parties independently determine whether activities proposed are in the public interest and represent the LRC option. Staff highlight PacifiCorp's deficient renewable energy target setting as another key issue area in these draft CEIP comments. The Company does not appear to propose a publicly available renewable energy specific target. Within the context of the Company's CEIP report narrative, PacifiCorp references the existing Washington Inter-Jurisdictional Allocation Methodology (WIJAM) for Washington-specific allocations of the Company's system-wide resources through 2023 and on-going Multi-state protocol (MSP) negotiations in 2024 and beyond. Staff observe more specific state allocation factors appear in PacifiCorp's draft CEIP confidential workpapers. However, this supporting data does not meet Staff's expectations that such data is provided in an easily accessible format, as required by statute, rule, and the Commission's CETA Rulemaking Order.	The 2021 IRP's preferred portfolio represents the lowest reasonable cost portfolio of resources to serve customers in all six of PacifiCorp's states. Explanations and justifications for IRP analysis can be found in the IRP. Removing Jim Bridger from Washington's allocation of electricity by 2023 meets the requirements of RCW 19.405.030. Final allocation decisions will be determined in MSP.	Comment noted
330	2021-12-10	WUTC Staff	E-mail to IRP Team	Supporting Analyses	While electric utilities have discretion as to what data they designate as confidential, Staff sees no reason why PacifiCorp is designating a CEIP component as fundamental as its renewable energy specific target as confidential in its entirety; and it is counter to the transparent path its peer utilities have taken regarding this target. Staff is hopeful PacifiCorp will include its renewable energy specific target in its final CEIP without compromising the sensitive material discussed in other Company settings.	The company includes in its filing a publicly available workpaper reporting annual projected renewable and clean energy generation and Washington retail sales that are used to calculate interim targets through 2040 and 2045 within the CEIP. See Chapter 1 and Appendix D for references to the relevant workpapers. Additional supporting workpapers remain confidential as they contain data specific to both individual resources and ongoing multi-state protocol (MSP) negotiations. Please also refer to responses to comments 326-328.	CEIP updated
331	2021-12-10	WUTC Staff	E-mail to IRP Team	Interim and Specific Targets	Staff appreciates the incremental action PacifiCorp is planning beyond what is laid out in the Company's 2022-23 biennial conservation plan (BCP) in setting its CEIP energy efficiency (EE) targets. The Company's 2021 IRP solution, which underwent both a reliability assessment and cost and risk analysis two-step process undertaken endogenously within the PLEXOS portfolio development process, appears to inform its interim and specific targets. The yearly targets as listed suggest the Company has made the necessary adjustments to pursue "all" cost-effective EE, since the Company's 2021 IRP cycle. Additionally, Staff commends the Company for describing how it will make updates to its EE programs to better reach named communities, which comprise highly impacted communities (HICs) and vulnerable populations (VPs).	The company appreciates this positive feedback and intends to continuously work to improve its processes going forward.	Comment noted
332	2021-12-10	WUTC Staff	E-mail to IRP Team	Interim and Specific Targets	Staff did not observe interim EE targets explicitly called out but infers the yearly "total conservation" targets listed in Table 3.4 are the Company's interim targets. PacifiCorp should list its interim EE targets in its interim target section of the final CEIP as the rule requires.	Conservation targets are in Table 1.3 of the CEIP. Table 3.5 outlines forecasted conservation program impacts that meet (and exceed) the conservation targets in aggregate listed in Table 1.3	CEIP updated
333	2021-12-10	WUTC Staff	E-mail to IRP Team	Interim and Specific Targets	Staff is pleased that in setting the demand response (DR) target, the Company gained insight from its 2021 DR RFP results. Under CETA, DR includes pricing programs. As such, the company's DR target should also include the upcoming time-of-use pilot program. However, if the capacity (i.e., MW) expected from this pilot is not available by the final CEIP filing, Staff recommends PacifiCorp apply the results of this pilot to future DR targets. As a follow on to the above Data disclosure issue area discussion, Staff strongly recommends PacifiCorp better explain and update its Appendix C specific actions table. For example, Staff notes project costs are pending and nonenergy impacts (NEIs) remain to be determined for the Company's renewable energy projects. NEIs are also outstanding for the EE specific actions. Given most of the renewable energy projects source to PacifiCorp's 2020 All-source RFP and the Company was expecting to execute agreements with associated bidders by early November 2021, one would expect cost information to be listed at minimum for these line items. Staff expects PacifiCorp to furnish complete data, including NEIs, for its EE specific actions based on insights the Company has gained developing its 2022-23 BCP. Staff strongly recommends PacifiCorp minimize any remaining Appendix C data gaps when filing its final CEIP.	The company appreciates the positive feedback regarding demand response. The DR target and specific actions have been updated to make reference to time of use pilots.	CEIP updated
334	2021-12-10	WUTC Staff	E-mail to IRP Team	Specific Actions	As a follow on to the above Data disclosure issue area discussion, Staff strongly recommends PacifiCorp better explain and update its Appendix C specific actions table. For example, Staff notes project costs are pending and nonenergy impacts (NEIs) remain to be determined for the Company's renewable energy projects. NEIs are also outstanding for the EE specific actions. Given most of the renewable energy projects source to PacifiCorp's 2020 All-source RFP and the Company was expecting to execute agreements with associated bidders by early November 2021, one would expect cost information to be listed at minimum for these line items. Staff expects PacifiCorp to furnish complete data, including NEIs, for its EE specific actions based on insights the Company has gained developing its 2022-23 BCP. Staff strongly recommends PacifiCorp minimize any remaining Appendix C data gaps when filing its final CEIP.	NEI's for energy efficiency actions with energy savings have been added to the final Exhibit C. NEI calculations utilize the DNV mapping (NEI to measure) and \$/kWh estimates provided in Appendix 4 for the DSM Business Plan for 2022-2023. Notes documenting the methodology using the DNV values and calculations related to the low income program repair costs have been added.	CEIP updated

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
335	2021-12-10	WUTC Staff	E-mail to IRP Team	Specific Actions	Regarding PacifiCorp's planned DR specific actions, Staff notes all programs are in development. DR in the Company's Washington service territory is new but given the Company's experience with DR in other states, we anticipate smooth implementation. To ensure these DSM programs properly serve all customers, Staff strongly encourages PacifiCorp to consistently confer with an advisory group about DR. This does not necessarily mean the creation of another DR-specific advisory group. The Company could leverage its existing Washington DSM advisory group structure, expanding this group's purview to encompass all distributed energy resources (DERs). In the final CEIP, PacifiCorp should: <ul style="list-style-type: none"> •Include its time-of-use pilot in the Company's specific actions list (i.e., Appendix C). •Describe how it will utilize an advisory group process to further DR in Washington. •Finalize applicable DR program budgets and related implementation decisions. 	The final CEIP includes time-of-use pilots in the company's specific actions for DR and describes more fully the anticipated process for soliciting feedback on program design and draft filings, including utilizing the Washington DSM advisory group.	CEIP updated
336	2021-12-10	WUTC Staff	E-mail to IRP Team	Specific Actions	Staff observes PacifiCorp did not connect its specific actions to any resource adequacy (RA) metrics as required per rule. This represents another area where the Company can better define linkages between its CEIP and 2021 IRP, which used a minimum capacity reserve margin of 13 percent as the primary RA metric. In meeting the standards in RCW 19.405.040 and RCW 19.405.050 requirements are clear PacifiCorp's specific actions must demonstrate its customers are benefiting from the transition to clean energy through energy security and resiliency. Staff encourages PacifiCorp to clarify how its specific actions are consistent with the Company's resource adequacy requirements in its final CEIP.	The company discusses the modeling of reliability requirements in Chapters 1 and 3 of the CEIP; the resource adequacy connection is now made explicit in Chapter 3 regarding supply-side resource specific actions. The solicitation process for the 2020AS RFP did not include an evaluation of CBIs as none were required at the time. With the understanding that supply-side resource selections in Table 3.1 are the result of an RFP process initiated in the 2019 IRP prior to the development of CETA rules, the company has clarified how its selections nonetheless meet CETA priorities in Chapter 3, "CETA Prioritization", and benefits Washington customers by contributing to the achievement of CETA objectives.	CEIP updated
337	2021-12-10	WUTC Staff	E-mail to IRP Team	Specific Actions	As discussed further in the next Customer benefit data sub-section, Staff finds no mention in the specific action selection methodology as to how customer benefit indicators (CBIs) or other equity considerations informed the selection of resources. Specifically, Staff takes issue with PacifiCorp's assertion that "the 2020 All-source RFP resources are primarily located outside of Washington, and therefore, CBIs related to [named communities] are not applicable." Staff is not aware of any so-called outside Washington geographic CBI "exclusion" per statute or rule and expects the company to fully comply with this important CETA provision.	PacifiCorp has added a section to the CEIP to specifically address how supply-side actions align with or are supported by CBIs. PacifiCorp continues to maintain that nonenergy benefits related to out-of-state supply side actions are not applicable.	CEIP updated
338	2021-12-10	WUTC Staff	E-mail to IRP Team	Specific Actions	Beyond CBI considerations, Staff has numerous questions regarding PacifiCorp's treatment of equity and customer impacts associated with its recommended specific actions. The draft CEIP lacks adequate context explaining the forecasted distribution of NEIs across programs during the 2022-25 compliance period. PacifiCorp does not explain how these NEIs were determined and only directs the reader to the DNV analyses supplied as Appendix 4 to the Company's 2022-23 BCP. Staff maintains "forecasted distribution" should detail what customers, populations, or geographic locations are impacted and the corresponding breakdown of costs and benefits. PacifiCorp should address these deficiencies in its final CEIP.	Information summarizing the DNV approach to calculating the NEIs utilized in the program level assessment has been added to the final CEIP. A work paper prepared by AEG which builds upon the DNV measure level mapping and calculates the values found in Tables 3.6 and Figure 3.1 is provided. This work paper provides a forecasted distribution by customer (residential, non-residential) type and energy efficiency measure (windows, HVAC, lighting, etc.) type. Other than savings estimates associated with specific actions tied to target communities, the company does not have a geographic forecast for energy efficiency.	CEIP updated
339	2021-12-10	WUTC Staff	E-mail to IRP Team	Specific Actions	PacifiCorp does present select data that should enable the Company to track how specific actions impact named communities. A bona fide example is the SAIDI, SAIFI, and CAIDI data presented indicating the duration and frequency of outages during major events are significantly worse for highly impacted communities. In its final CEIP, PacifiCorp should demonstrate how select specific actions are trying to reduce this power reliability disparity moving forward.	Please refer to the company's response to comment 256.	Additional analysis included in the CEIP.
340	2021-12-10	WUTC Staff	E-mail to IRP Team	Specific Actions	Staff commends PacifiCorp for proposing an electric vehicle (EV) grant program for named communities. However, data deficiencies associated with this program exist, including: no information offered as to which stakeholders the Company would engage, no justification as to why this EV grant program was proposed, and vagaries regarding program details (e.g., will PacifiCorp only install charging infrastructure or "potentially purchase electric vehicles" as well?). PacifiCorp should propose and vet such an EV program through its upcoming transportation electrification plan the Company expects to docket with the Commission during the first quarter of 2022. The "use case forecasts and the...energy impacts" associated with such an EV program are additional planning requirements PacifiCorp will need to consider in its next IRP two-year progress report and biennial CEIP update in 2023.	The company appreciates the positive feedback regarding our proposed electric vehicle grant program. Language has been added to the specific actions section related to EV grants providing details on proposed stakeholder engagement strategies and timelines related to program development and launch.	CEIP updated
341	2021-12-10	WUTC Staff	E-mail to IRP Team	CBIs	Staff cautions the following CBI feedback is not exhaustive. We encourage the Company to review closely comments from other stakeholders and additional CBI guidance Staff may be able to provide later in December 2021, time permitting. PacifiCorp's development of CBIs should not be the ultimate goal or objective of these equity-focused service quality indicators in the Company's CEIP. Instead, PacifiCorp needs to demonstrate how these CBIs inform selection of the Company's specific actions. PacifiCorp claims its "CBIs are designed to demonstrate the impact of proposed programs, actions, and investments." However, Staff does not see any evidence where the Company applies these indicators when evaluating existing programs, proposed programs, or new resource investments. Other stakeholders consulted appear to share Staff's perspective that CBIs should enable specific action monitoring and performance tracking. Staff strongly urges PacifiCorp clearly write, with an appropriate level detail how CBIs are used in resource selection. The company must outline CBI impacts (negative or positive) to be compliant with statute and rule. To achieve these objectives PacifiCorp needs to clarify the relationship between each specific action and its associated CBIs in the Company's final CEIP.	PacifiCorp has reviewed those comments from other stakeholders and is providing a response to them in Appendix A. Please refer to the company's response to comment number 258. Please refer to the company's response to comment number 336, regarding how CBIs were used in resource selection.	Comment noted Comments noted and CEIP updated
342	2021-12-10	WUTC Staff	E-mail to IRP Team	CBIs	When considering equity, Staff does appreciate PacifiCorp developing its first round of CBIs in conjunction with its Equity Advisory Group (EAG) supplemented with as much public input as the Company could gather. Hopefully future CBI iterations in subsequent CEIPs will allow PacifiCorp to further its public communications and engagement, especially with its named communities. With that future goal in mind, the following are incremental CBI refinements Staff encourages the Company to address in its final 2022 CEIP: <ul style="list-style-type: none"> •Fold in and better explain the baseline data from which the CBIs were developed by adding column(s) to the CBI summary table. The current draft CEIP organization, which describes the baseline analysis after listing the CBIs in tabular form, makes it difficult to connect what information informed what indicator(s). •Do retroactive bill assistance programs directly mitigate customer energy burden? Or should PacifiCorp re-design programs to provide cost relief when bills are initially due? Staff encourages the Company to consider bill assistance timing in its final CEIP. •Supplement program participation tables with population numbers eligible for each program. Side-by-side program enrollment actuals versus potential should provide a better snapshot of current program effectiveness. 	1. Please refer to the "Summary of Customer Benefit Indicators" section in Chapter 2 of the CEIP for an explanation of how the EAG process informed the creation and iteration of the CBIs. 2. PacifiCorp has contracted with Empower Dataworks to develop metrics and identify areas of high energy burden. Once the data is obtained, it can be used to develop a "heat" map of areas experiencing high energy burden. Theoretically, Washington Rate Schedule 17 is designed to offer bill credits to customers who are at or below various thresholds of the Federal Poverty Level / Area Median Income. All else equal, as energy expenditures go down, so must energy burden. While PacifiCorp has proposed a number of actions relating to energy and efficiency program offerings to customer in named communities (including implementing the Low Income Weatherization program), it is prudent to note that LIBA specifically is covered under separate regulation; if a utility is required to offer a program or take an action by a different law, then that program or action will not be identified in the CEIP as a utility action, even if it is consistent with CETA. 3. With additional data and analysis following the Nov 1, 2021 draft submittal, PacifiCorp was able to make two updates within the final CEIP that address the question of percentage participation rates. First, PacifiCorp added a new table showing HES, HER, LIWx, and LIBA participation rates among the 22 vulnerable populations, based on PacifiCorp tracking data and 2021 residential survey responses. Please see Table 2.17 in Chapter 2. Second, PacifiCorp was able to update the "In Progress" placeholders in Table 2.16 to include LIBA percentage participation rates by HIC and overall.	CEIP updated
343	2021-12-10	WUTC Staff	E-mail to IRP Team	CBIs			

Stakeholder Input and Responses

Number	Date	Source of Comment	Where was the comment made?	Category	Comment	PacifiCorp Response	Method if Applicable
344	2021-12-10	WUTC Staff	E-mail to IRP Team	Public Participation	<p>Staff observes Chapter Five, Public Participation, of PacifiCorp's draft CEIP is similar in substance to the Company's re-filed Public Participation Plan (PPP) dated July 30, 2021. However, PacifiCorp's public participation treatment in its draft CEIP is more expansive than its re-filed PPP given the Company has included consolidated stakeholder feedback as part of its draft CEIP filing. For this reason, Staff recommends PacifiCorp make the following public participation improvements in its final CEIP rather than re-filing another PPP:</p> <ul style="list-style-type: none"> •Actionable steps to improve "language accessibility" and a plan to assess customer needs, especially for named communities. PacifiCorp should detail which programs it plans to review and/or revamp. •Details of each outreach method's performance. For example, the numbers of: people subscribed to the CEIP email list, public participants at each public meeting, visits the PacifiCorp CETA website registered, comments received via email or phone. While Staff view PacifiCorp's public participation planning as satisfactory, post-mortem assessments of what worked and what did not are lacking in the draft CEIP. For instance, did the Company find a financial stipend useful in recruiting and retaining its EAG members? Given public participation's iterative nature, PacifiCorp showing the first round of public engagement results should provide a baseline for future public participation and outreach improvement. •Summaries and takeaways from survey results posted to the Company's CEIP website to clarify how PacifiCorp plans to leverage insights gained. 	<p>PacifiCorp has added additional detail to Chapter Five, Public Participation, including:</p> <ul style="list-style-type: none"> -Expanded details and key takeaways of public outreach performance and plans for 2022-2025 -Additional details about survey results and how PacifiCorp will incorporate response feedback <p>PacifiCorp has also added additional detail in Chapter Three, Specific Actions, surrounding language accessibility and expanded outreach to named communities through program marketing.</p>	CEIP updated
345	2021-12-10	WUTC Staff	E-mail to IRP Team	Workplans	<p>Beyond the recommended corrective actions discussed in the "key issue areas" section of these comments that Staff expects PacifiCorp to address in its final CEIP due on January 1, 2022, Staff lists the following additional items that we would appreciate the Company providing a timetable for addressing in its final CEIP. PacifiCorp's commitments list or workplan, which can be included as an appendix to its final CEIP, should include but not be limited to the following:</p> <ul style="list-style-type: none"> •Waiver of the Commission's advertising rule (i.e., WAC 480-90-223) to cover any related advertising PacifiCorp may undertake to further its CEIP objectives. •DER assessments beyond EE and DR, as described in WAC 480-100-620(3), including distributed energy programs and mechanisms identified pursuant to RCW 19.405.120 and other DER potential assessments. •A detailed, comprehensive list of any items, besides those explicit in WAC 480-100-625(4), that the Company has identified to update in its 2023 IRP progress report due to the Commission by January 1, 2023. •Distribution planning – How has PacifiCorp (either in its IRP or CEIP development processes to date) analyzed CETA's impact (or lack of impact) on the Company's distribution planning efforts? •A modeling workplan that lays out PacifiCorp's proposed approach for quantifying CBIs in the Company's next IRP portfolio development and optimization. •Components of RCW 19.280.030(1) that refine implementation of the Company's IRP-to-CEIP, via the clean energy action plan, development process emphasizing compliance with RCW 19.405.040(8). 	<ol style="list-style-type: none"> 1. The company interprets WAC 480-90-223 to be applicable to gas utilities. PacifiCorp expects that any CEIP-related advertising would be covered by WAC 480-100-223(2), which allows advertising of various utility programs that are intended to reduce peak demand, safety and emergencies, advertising required by law or regulation (which would include CETA), potential employment opportunities, use of efficient appliances, equipment and services, announcements of proposed rates and schedules (which would include any implementation of CEIP programs done via tariff), and notices of meetings or hearings concerning rates or tariffs. The company does not anticipate needing to file for a waiver of this rule. 2. Private generation and electric vehicle forecast are completed in the spring of the first year of the two year IRP cycle. Behind the meter battery storage projections are expected to be incorporated in the 2023 IRP and development of this forecast is also anticipated in the spring of first year of the two year IRP cycle. 3. The company anticipates providing an outline of the Draft IRP in mid-2022, which will include a list of planned items that it will include in its 2023 IRP progress report. 4. To the extent possible, the company is currently incorporating demographic information within its distribution planning efforts. As an example, in its annual reliability analysis, demographic and energy equity data was incorporated as a scoring metric in addition to legacy reliability, numbers of customers served by the circuit, and other relevant prioritization aspects to assess and advance projects for several circuits contained within HIC area. Although no substantial bias in performance could be demonstrated within HIC areas, the data was integrated into the planning process. Further, based on residential survey responses, the company is identifying if the survey respondent and their associated transformer is located in an HIC and if the respondent self-identifies as a member of a vulnerable population and will integrate this data into its reliability planning activities as is appropriate. 5. As part of the 2023 IRP cycle, PacifiCorp is planning to collaborate with other WA IOUs to consider methodological options for incorporating CBIs in future IRP development. 6. The company is committed to strengthening the connection between the IRP and CEIP particularly via the Clean Energy Action Plan (which was incorporated as Appendix O in the 2021 IRP). A workplan or list is anticipated to be included in the 2023 IRP outline of the Draft IRP in mid-2022. 	Comments noted