

Agenda Date: February 11, 2021

Item Number: A1

Docket: UE-200420

Company: PacifiCorp, d/b/a Pacific Power & Light Company

Staff: Jim Woodward, Regulatory Analyst

Recommendation

Issue an order in Docket UE-200420, granting PacifiCorp's petition for exemption filed on January 25, 2021, requesting a one-time exemption from the draft IRP filing requirement in WAC 480-100-625(3) and cancelling the February 22, 2021, Recessed Open Meeting.

Staff further recommends the commission issue in this docket a notice informing the public of the open meeting date on which the company's presentation of its final IRP, to be filed on April 1, 2021, will be heard, and allowing a comment period on the company's final IRP prior to hearing this matter at a future open meeting.

Background

Under WAC 480-100-625(3), electric utilities must file draft integrated resource plans (IRPs or plans) no later than four months prior to the due date of the final IRP and the commission must hold an open meeting on the draft plan. PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or company) filed their most recent electric IRP on October 18, 2019. Due to new Clean Energy Transformation Act (CETA) statutory requirements for IRPs that went into effect on May 7, 2019, the commission accepted PacifiCorp's most recent electric IRP as a progress report and took no further action on that filing, and ordered the company to submit its next draft IRP by January 4, 2021, and its next final IRP by April 1, 2021.¹ Company operations rules in WAC 480-100-008 allow the commission to grant an exemption to the rules in Chapter 480-100 WAC, if such an exemption is in the public interest.

On January 25, 2021, PacifiCorp filed a petition requesting the Washington Utilities and Transportation Commission (commission) exempt the company on a one-time basis from WAC 480-100-625(3), which details the required contents of a draft IRP and states the commission will convene an open meeting to hear public comment on the draft IRP filed by the company. PacifiCorp acknowledges its January 4, 2021, filing does not meet the draft IRP criteria described in WAC 480-100-625(3) as this filing does not include a preferred portfolio and supporting analysis, including associated scenarios and sensitivities. As noted in its filing letter accompanying its draft IRP, due to the progressive nature of PacifiCorp's multi-state, system-wide IRP development process, PacifiCorp has just begun the modeling phase of the 2021 IRP, which necessarily follows an extensive process of updating inputs, methodologies, and assumptions. In addition, PacifiCorp has been working to implement new modeling software for the 2021 IRP, which has added workload to the 2021 IRP development process. As a result,

¹ Order 03, UE-180259, (November 7, 2019).

PacifiCorp had not completed any model runs used to establish resource portfolios and to evaluate costs and risks at the time of its 2021 draft IRP filing.

PacifiCorp claims conducting a recessed open meeting on February 22, 2021, to hear comments on PacifiCorp's draft IRP filing would have limited value given its draft IRP filing is largely devoid of data and analyses. The company respectfully requests that the commission schedule this matter to be heard at a later open meeting after PacifiCorp files its final IRP on April 1, 2021. Further, PacifiCorp requests the commission allow a comment period on the company's final IRP prior to that open meeting. PacifiCorp maintains this petition is in the public interest as it will allow the company and interested stakeholders to instead focus efforts on developing a final, CETA-compliant 2021 IRP.

Discussion

Recessed open meeting delay and final IRP comment period

Commission staff (staff) agrees that the petition for exemption filed in this docket is in the public interest. Although staff contend PacifiCorp received adequate notice regarding the draft 2021 IRP and its expected contents,² staff is sensitive that PacifiCorp's current multi-state IRP development process does not align well with the newly adopted IRP rules. Additionally, staff believes the commission granting this petition aligns with its intent to provide flexibility to utilities during the 2021 IRP cycle, which is the first under CETA directives.³

Lastly, staff maintains that PacifiCorp's draft IRP filing will still yield value because comments were filed on the draft IRP as scheduled by February 5, 2021. These comments filed by staff and other interested stakeholders should provide PacifiCorp further valuable guidance as to what changes need to be made for the company to file a final 2021 IRP that is CETA-compliant by April 1, 2021.

Stakeholder outreach

Staff engaged in discussion with the Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel), the Northwest Energy Coalition (NVEC), Renewable Northwest, and the Sierra Club. Public Counsel, Renewable Northwest, and the Sierra Club supported PacifiCorp's petition. NVEC supports the petition on the condition the commission makes clear in its order this process change will assure the integrity and completeness of the record for PacifiCorp's 2021 IRP. Staff believes following the process laid out in the company's petition will foster such transparency.

² [Order 03](#) in Docket UE-180259 establishing a draft 2021 IRP filing date of January 4, 2021 was issued on November 7, 2019. At the time, the commission discussed that scheduling draft electric IRP deadlines more than a year out would, "promote [PacifiCorp's] compliance with the new [CETA IRP] statutory requirement[s]" (see par. 17 of Order 03). Staff communicated to PacifiCorp their expectation the draft 2021 IRP should include the company's base case, preferred portfolio, and supporting model output on June 10, 2020. This staff guidance preceded PacifiCorp's 2021 IRP public interest meeting kick-off.

³ Dockets UE-191023 and UE-190698 (*Consolidated*), General Order 601 at par.168 (December 28, 2020).

Conclusion

Staff reviewed PacifiCorp's petition for exemption and believes it is in the public interest. Staff recommends that the commission grant the petition and issue an order allowing a one-time exemption from the draft IRP filing requirement in WAC 480-100-625(3) and cancelling the February 22, 2021, open meeting. Staff further recommends the commission issue a notice in this docket after PacifiCorp files its final IRP on April 1, 2021, rescheduling the open meeting and company presentation and allowing a comment period on the company's final IRP prior to the re-scheduled open meeting.