

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFICORP, dba PACIFIC POWER &
LIGHT COMPANY

Petitioner,

DOCKET UE-23 _____

**PacifiCorp’s Petition for Waiver of
WAC 480-100-625 and WAC 480-100-
640 and Approval of Alternative Filing
Schedule**

I. Introduction

1 In accordance with Washington Administrative Code (WAC) 480-100-008, 480-07-110, WAC 480-07-370(3), PacifiCorp, doing business as Pacific Power & Light Company (PacifiCorp or the Company), hereby petitions the Washington Utilities and Transportation Commission (the Commission) for a waiver from the following filing deadlines:

- a. Submission of an IRP work plan by October 1, 2023, as required by WAC 480-100-625(2).
- b. Submission of a draft IRP by October 1, 2024, as required under WAC 480-100-625(3).
- c. Submission of an integrated resource plan (IRP) by January 1, 2025, as required in WAC 480-100-625(1).
- d. Submission of a Clean Energy Implementation Plan (CEIP) by October 1, 2025, as required in WAC 480-100-640(1).

2 The Company further requests that the Commission approve an alternative filing schedule, which would extend the existing timeline of each of these filing deadlines by three months. This adjustment would allow PacifiCorp to submit its IRPs by April 1 every four years, with the next one (2025 IRP) due by April 1, 2025, an IRP work plan by January 1, 2024, and the draft 2025 IRP by January 1, 2025. This alternative filing schedule would also permit the CEIP to be filed by January 1 every four years, with the

next CEIP due on January 1, 2026.

3 PacifiCorp is an electric company and public service company in the State of Washington within the meaning of RCW 80.04.010, and subject to the Commission’s jurisdiction with respect to its prices and terms of electric service to retail customers in Washington. The Company provides electric service to approximately 140,000 retail customers in Washington and approximately 2.0 million total retail customers in Washington, California, Idaho, Oregon, Utah, and Wyoming.

4 Please direct all formal questions regarding this petition to the contacts below:

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II. Standard

5 The Commission’s administrative rules governing the preparation and submission of the IRP state that “Unless otherwise ordered by the commission, each electric utility must file an [IRP] with the commission by January 1, 2021, and every four years thereafter.”¹ Similarly, according to WAC 480-100-640(1), utilities are required to file CEIPs by October 1, 2021, and every four years thereafter, unless “otherwise ordered by the commission.” The Commission has the authority to waive both rules under WAC 480-100-008 and WAC 480-07-110(1), as long as the waiver is “consistent with the

¹ RCW 19.280.030(1) mandates that utilities must “develop” an IRP at least every four years. The Legislature has directed the Commission to establish rules regarding the preparation and submission of IRPs, as outlined in RCW 19.280.040. The Commission has adopted regulations that require the submission of an IRP by January 1, 2021, and every four years thereafter, as outlined in WAC 480-100-625. Similarly, according to RCW 19.405.060(1)(a), utilities are required to develop and submit a CEIP by January 1, 2022, and every four years thereafter. The Commission has adopted regulations that require the submission of an CEIP by October 1, 2021, and every four years thereafter, as outlined in WAC 480-100-640(1).

public interest, the purposes underlying [the] regulation, and applicable statutes.”

III. Argument

6 PacifiCorp is a multi-state utility serving nearly 2 million customers across six states. Notably, PacifiCorp manages two balancing authority areas as a unified integrated system, adhering to the criteria and requirements set forth by the Western Electricity Coordinating Council and the North American Electric Reliability Corporation. PacifiCorp’s systems directly benefit customers by enhancing reliability and cost-efficiency through the utilization and optimization of the diverse resources within its extensive multi-state generation and transmission network.

7 The Company firmly believes that the most effective approach to harness these benefits is through a unified six-state, system-wide resource planning strategy, rather than developing six separate plans. Consequently, PacifiCorp creates a single IRP for its entire system and submits it to each applicable state regulatory commission. This comprehensive IRP process allows the Company to holistically incorporate evolving state and federal requirements, market developments, and load constraints in a comprehensive manner. This approach would not be feasible, or if feasible would demand significantly more time and resources from PacifiCorp, if the Company were to instead create individual IRPs for each of its six service territories based on staggered filing deadlines.

8 According to current regulations, the Company must submit its 2025 IRP by January 1, 2025, and its second CEIP by October 1, 2025. PacifiCorp proposes to submit its 2025 IRP work plan by January 1, 2024, IRP draft by January 1, 2025, file the 2025 IRP by April 1, 2025, and file its CEIP by January 1, 2026. This adjusted schedule will be repeated every four years. This request would enable PacifiCorp to align its IRP and CEIP filings with the cadence of its other jurisdictions, providing adequate time to

develop and submit its CEIP thereafter.

9 It's important to note that the Company is not requesting any waiver from the Commission's substantive planning requirements but rather a slight extension of time to align with the generally accepted filing deadlines across the Company's service territories. Similarly, in California, the Company has been exempt from that State's IRP planning and filing processes since at least 2003, and is allowed to file its IRP "off-cycle" from other California utilities, better aligning PacifiCorp's processes with California's substantive requirements.²

10 Granting the requests within this application is in the public interest as it would preserve the integrity of PacifiCorp's system-wide resource procurement planning. As previously mentioned, PacifiCorp's system-wide planning, with its extensive geographic reach, offers substantial resource diversity and significant economies of scale and scope that provide benefits to all of PacifiCorp's customers.

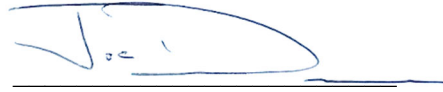
IV. Conclusion

11 The Company respectfully requests that the Commission grant PacifiCorp waive the requested filing deadlines in WAC 480-100-625 and WAC 480-100-640 and approval for an alternative filing schedule, allowing the Company to submit its IRP work plan by January 1, 2024, the draft IRP no later than January 1, 2025, the final IRP no later than April 1, 2025, the 2025 CEIP by January 1, 2026, and continue this schedule every four years thereafter.

² See, e.g., *In re PacifiCorp's IRP Exemption Application*, D.03-07-011 (Jul. 10, 2003).

DATED this 26th day of September, 2023.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'JD', is written above a horizontal line.

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