

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PacifiCorp d/b/a Pacific Power & Light
Company's 2023 RPS Report

DOCKET UE-_____

**PacifiCorp's Petition for a Five-Year
Partial Waiver of WAC 480-109-210(2)**

1 In accordance with WAC 480-109-030 and WAC 480-07-370(3), PacifiCorp
d/b/a Pacific Power & Light Company (PacifiCorp) petitions the Washington Utilities
and Transportation Commission (Commission) for a five-year partial waiver of WAC
480-109-210(2) that requires Renewable Portfolio Standard (RPS) reports to be based in
part on information from Company's most recently acknowledged Integrated Resource
Plan (IRP), and instead, permit the Company to rely on information from a recently filed
IRP.

2 PacifiCorp is an electric company and public service company in Washington
within the meaning of RCW 80.04.010, and is subject to the Commission's jurisdiction
over 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 million total retail customers in Washington,
California, Idaho, Oregon, Utah, and Wyoming.

3 PacifiCorp's name and address:

Washington Dockets
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
washingtondockets@pacificorp.com

Zachary Rogala
Senior Attorney
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
zachary.rogala@pacificorp.com

I. PETITION

4 PacifiCorp is required to submit an annual RPS report to the Commission, which

details the resources that the Company has acquired or contracted with to meet the utility's renewable resource obligation for the year.¹ This report must be based in part on information from the Company's most recently acknowledged IRP.²

5 For various reasons, the Commission has discontinued its policy of acknowledging utility IRPs.³ As a result, PacifiCorp's 2017 IRP is the most recent IRP that the Commission has acknowledged,⁴ although the Company has filed several more recent IRP-related filings, including as recently as April of 2024.⁵

6 Together, Commission regulations require PacifiCorp to file its 2023 RPS report by June 1, 2024, and must include information from PacifiCorp's 2017 IRP. The Company requests a five-year waiver of the requirements in WAC 480-109-210(2) that require PacifiCorp to base its RPS report on the most recently *acknowledged* IRP, and instead permit PacifiCorp to use information from a recently *filed* IRP-related filing. If granted, the Company would use information from its 2021 IRP or 2023 IRP Informational Update to inform the 2023 RPS report, and subsequent RPS reports for the following four years would be informed by the Company's then-relevant IRP-related filing.

7 This narrow waiver would allow the Commission to review the Company's most recent procurement activity, and ensure a more informed and relevant review of the Company's RPS progress.

¹ WAC 480-109-210.

² See, e.g., WAC 480-109-210(2)(a)(i)(B), (E).

³ See, e.g., Commission Notice of Change to Electric IRP Process, Dkts. UE-200301, UE-200394, UE-200420 (Jul. 25, 2023); *In re PacifiCorp's 2019 IRP Progress Report*, Order 03, Docket UE-180259 (Nov. 7, 2019).

⁴ *In re PacifiCorp's 2017 IRP*, Commission Acknowledgment Letter, Docket UE-160353 (May 7, 2018).

⁵ *In re PacifiCorp's 2023 IRP Informational Update*, Dkt. UE-200420 (Apr. 1, 2024).

II. CONCLUSION

8 The Company requests a five-year waiver of WAC 480-109-210(2) to permit the Company to file its 2023 RPS report, as well as 2024, 2025, 2026, and 2027 RPS reports, with information from the Company's a recently filed IRP-related filing.

Respectfully submitted, this 7th day of May, 2024

/s/ Zachary Rogala
Zachary Rogala
Senior Attorney
PacifiCorp
Oregon State Bar # 222814
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
(435) 319-5010
zachary.rogala@pacificorp.com