

October 18, 2019

VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

Received
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10/18/19 14:40
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: Docket UE-180259—2019 Integrated Resource Plan

Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submits for filing its 2019 Integrated Resource Plan (2019 IRP) with the Washington Utilities and Transportation Commission. This filing is submitted in accordance with WAC 480-100-238(4) and Order 02 in Docket UE-180259. The 2019 IRP contains information outlining how Pacific Power has addressed each of the procedural and substantive elements of the Commission’s rules (*see* Appendix B-IRP Regulatory Compliance, Tables B.2 and B.3). The 2019 IRP is also available electronically on the company’s website at: www.pacificorp.com/energy/integrated-resource-plan.html.

Consistent with the company’s previous IRP filings, PacifiCorp will also be providing supporting analysis in electronic files; these electronic files will be provided on USB drives on approximately October 25, 2019. The electronic files will include confidential materials provided on a separate USB under WAC 480-07-160. These confidential materials are spreadsheets and data files containing confidential information as defined in WAC 480-07-160(2)(b), RCW 80.04.095, and RCW 81.77.210.¹ Specifically, the files contain competitively sensitive and proprietary information including contract pricing, detailed load forecasts, and detailed resource cost data and third-party proprietary modeling information. Disclosure of the information in these files would result in an unfair competitive disadvantage and result in financial harm to the company. This financial harm will result from the company’s inability to negotiate lowest-cost pricing on behalf of its customers if its contractual counterparties are put on notice that pricing and contract terms will be disclosed on the public record. This financial harm would ultimately harm ratepayers if Pacific Power is required to incur greater costs associated with providing electric service.

Interested parties, other than Commission staff, may contact Jessica Ralston (contact information listed below) for a copy of a non-disclosure agreement that must be signed and returned to PacifiCorp before obtaining a copy of any confidential information.

Formal correspondence for this proceeding should be addressed as follows:

¹ Due to the voluminous nature of the files it is impractical and unduly burdensome to provide a redacted version of these materials. Therefore, consistent with WAC 480-07-160(8) the company has not shaded and labeled the spreadsheets but is providing separate USB drives for the confidential materials (which also contain non-confidential materials) and is including “Conf” in the file name when possible, or has stored confidential materials in folders marked as “Confidential” to identify these materials.

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

Jessica Ralston
Senior Attorney
Pacific Power
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
jessica.ralston@pacificorp.com

It is respectfully requested that all formal data requests regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/

Etta Lockey
Vice President, Regulation
Pacific Power & Light Company
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
(503) 813-5701
etta.lockey@pacificorp.com

Enclosures

180259-PPL-2019-IRP-COS-10-18-2019.pdf

180259-PPL-2019-IRP-10-18-2019.zip