

October 25, 2019

VIA ELECTRONIC FILING

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

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 10/25/19 14:46
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 UTIL. AND TRANSP.
 COMMISSION

Re: Docket UE-180259—Replacement Pages for the 2019 Integrated Resource Plan and Electronic Supporting Analysis

On October 18, 2019, Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, submitted its 2019 Integrated Resource Plan (2019 IRP) with the Washington Utilities and Transportation Commission. After submission, the company identified additional information and clarifying changes in the 2019 IRP, Volume II – Appendices A-L, and clarifying changes and a value correction in 2019 IRP Volume II – Appendices M-R. The changes are summarized in the table below. The company is enclosing replacement PDFs that include all of these changes. The identified changes do not affect the preferred portfolio, inputs or outcomes of the 2019 IRP, and do not affect any other materials provided.

PacifiCorp 2019 IRP Volume II Appendices A-L¹		
Reference	Update	Page
Appendix D	Replacement of blank page with additional DSM tables and discussion.	72
Appendix E	Replaced Appendix E in its entirety with updated discussion.	73-76b ³
PacifiCorp 2019 IRP Volume II Appendices M-R²		
Appendix M	Replacement page to align the Gateway quick reference table (bottom of page) with the changes below:	276
	Replacement page of case P-22 fact sheet clarifying description and correcting the transmission path map.	378
	Replacement page of case P-22 fact sheet correcting the Bridger WY to Populus path rating from 1,621 MW to 1,700 MW.	379
	Replacement page of case P-23 fact sheet clarifying description, correcting description and transmission path map.	380
	Replacement page of case P-23 fact sheet correcting the Bridger WY to Populus path rating from 1,621 MW to 1,700 MW.	381
	Replacement page of case P-25 fact sheet clarifying description and correcting the transmission path map.	382
	Replacement page of case P-25 fact sheet correcting the Bridger WY to Populus path rating from 1,621 MW to 1,700 MW.	383
	Replacement page of case P-26 fact sheet clarifying description and correcting the transmission path map.	384

¹ This change is incorporated in the publicly posted version:

https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2019_IRP_Volume_II_Appendices_A-L.pdf

² This change is incorporated in the publicly posted version:

https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2019_IRP_Volume_II_Appendices_M-R.pdf

³ Two additional pages in Volume II appendices A-L, Appendix E (Smart Grid) are numbered 76a and 76b.

In addition, as discussed in the October 18, 2019 filing letter, the company is supplementing its 2019 IRP filing with the enclosed USB drives to support and provide additional details for the analysis described in the 2019 IRP.

The confidential materials provided on the USB drive 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 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:

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

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

¹ Due 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 USBs for the confidential materials (which also contain non-confidential materials) and is including "Conf" in the file name when possible, or stored confidential materials in folders marked as "Confidential" to identify these materials.

