

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of)	DOCKET UE-210829
)	
PACIFICORP, d/b/a)	ALLIANCE OF WESTERN ENERGY
PACIFIC POWER & LIGHT COMPANY'S)	CONSUMERS' RESPONSE IN
)	SUPPORT OF PACIFICORP'S
Clean Energy Implementation Plan)	PETITION FOR REVIEW OF
)	INTERLOCUTORY ORDER
_____)	

1 Pursuant to the Washington Utilities and Transportation Commission's ("Commission") Notice of Opportunity to Respond to Petition for Review of Interlocutory Order ("Petition for Review"),¹ the Alliance of Western Energy Consumers ("AWEC") hereby submits this Response in Support of PacifiCorp d/b/a Pacific Power & Light Company's ("PacifiCorp" or "Company") Petition for Review. As explained in PacifiCorp's Petition for Review, the forum to address updated interim targets for the 2022-2025 Clean Energy Implementation Plan ("CEIP") Implementation Period is unclear. PacifiCorp's 2023 Integrated Resource Plan ("IRP") Update indicates that PacifiCorp's interim targets are 27 percentage points lower than its Revised CEIP's interim targets. This change represents a significant departure from the Revised CEIP at issue in this proceeding, but it is unclear at this time how PacifiCorp will address this issue.

2 As indicated by PacifiCorp in its Petition for Review, two options were discussed to address this issue. Option 1 would have had PacifiCorp address the interim targets in its biennial CEIP update to be filed in November 2023, and Option 2 would have had PacifiCorp

¹ PacifiCorp filed a Motion for Clarification or Review, which was subsequently interpreted by the Commission as a Petition for Review of an Interlocutory Order.

update the interim targets in the current proceeding. At the May 5, 2023, prehearing conference, AWEC indicated its support for Option 2 given the awkwardness of both litigating and settling a CEIP that has outdated interim targets; however, AWEC accepts the Commission's determination that addressing updated interim targets should occur outside of the current proceeding.

3 Ensuring that PacifiCorp's CEIP reflects realistic and supported interim targets is vital to ensuring cost-effective compliance with Clean Energy Transformation Act requirements. Given the Commission's determination, AWEC supports PacifiCorp's primary recommendation that the Commission clarify that PacifiCorp can include updated interim targets in its November 2023 CEIP biennial update. If the Commission is disinclined to allow such an update in the 2023 CEIP biennial update, AWEC supports PacifiCorp's alternative request to allow such an update in the current proceeding, including any necessary schedule changes.

Dated this 7th day of June, 2023

Respectfully submitted,

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