



ATTORNEY GENERAL OF WASHINGTON

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May 3, 2021

SENT VIA WUTC WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
P. O. Box 47250
Olympia, WA 98504-7250

Re: PacifiCorp, d/b/a Pacific Power & Light Company's 2021 Integrated Resource Plan,
Docket UE-200420

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office ("Public Counsel") respectfully submits these comments in response to the Commission's Notice of Opportunity to File Written Comments, issued on April 2, 2021. These comments address PacifiCorp's interim filing of its Integrated Resource Plan (IRP). Public Counsel appreciates the opportunity to comment.

Though PacifiCorp's filing is not as developed as we had hoped to see at this point, we appreciate the Company's efforts to keep us and other stakeholders informed of the status of ongoing issues with the modeling software and the development of a robust IRP. PacifiCorp has reached out to Public Counsel to provide updates and answer questions. They have continued to engage with the technical advisory group and provided an updated timeline and explanations to those stakeholders as well. We also appreciate that the Company has continued to move forward with a public participation plan for their Clean Energy Implementation Plan to be filed later this year and the development of an Equity Advisory Group.

Public Counsel looks forward to reviewing the portfolio outputs and other information as it becomes available. In reviewing the future IRP draft, we will closely examine PacifiCorp's compliance with the requirements of the Clean Energy Transformation Act and corresponding administrative rules, the Company's use of market purchases in the development of their preferred portfolio, resource adequacy, and how the Company continues to engage with customers and other stakeholders through their upcoming public meetings and responses to stakeholder questions.

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Public Counsel appreciates the opportunity to submit these comments and looks forward to continued participation and review of PacifiCorp's IRP. If you have any questions about this filing, please contact Stephanie Chase at (206) 521-3212 or via e-mail at Stephanie.Chase@ATG.WA.GOV.

Sincerely,

Lisa W. Gafken

/s/

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