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VIA ELECTRONIC FILING

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
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Lacey, WA 98503

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UTIL. AND TRANSP.
COMMISSION

Re: Docket UE-180259—Response to Staff Petition for Exemption

On October 28, 2019, the Washington Utilities and Transportation Commission (Commission) Staff filed a petition seeking an exemption from WAC 480-100-238 (Petition). Staff’s petition requests that the Commission waive the requirement for Pacific Power & Light Company (Pacific Power), a division of PacifiCorp, to file an integrated resource plan in 2019 and instead treat the 2019 Integrated Resource Plan (2019 IRP) filed by Pacific Power on October 18, 2019, as a progress report. Pursuant to the Petition, the Commission would also suspend the requirement to acknowledge the 2019 IRP and instead direct the company to file an IRP no later than April 4, 2021. This waiver will allow Staff and the company to ensure that the 2019 legislation requiring a clean energy implementation plan is appropriately incorporated into PacifiCorp’s next IRP. Due to the timing of this legislation, it was not possible to incorporate these new requirements into the 2019 IRP.

Pacific Power is supportive of the Petition with one exception. The company does not support Staff’s recommendation set forth in the Petition that Pacific Power be directed to file a draft IRP on January 4, 2021. The Commission’s rules do not require the filing of a draft IRP. Instead the rules require the company to provide a work plan for informal commission review outlining the content of the IRP to be developed and the method that the company will use for assessing potential resources.¹ The rules also require that this work plan include an outline of timing and extent of public participation, including from Commission staff.²

Pacific Power meets these requirements through its robust public-input process that involves multiple stakeholder meetings to provide updates on the IRP development and modeling assumptions and to receive input from interested parties. All of the company’s public-input meeting presentations are posted on Pacific Power’s IRP website and provide draft information for the IRP modeling assumptions and results.³ The company also receives and responds to stakeholder feedback forms through its IRP website.⁴ The input from stakeholders received through these meetings and feedback forms informs updates and revisions to the IRP throughout the development process. The company provides modeling results during the public-input process as they develop including a draft preferred portfolio and action plan. Because the

¹ WAC 480-100-238(4).

² WAC 480-100-238(5).

³ <https://www.pacificorp.com/energy/integrated-resource-plan/public-input-process.html>

⁴ <https://www.pacificorp.com/energy/integrated-resource-plan/comments.html>

company is able to provide this robust, public-input process it would be duplicative to also require a draft IRP, as well as problematic.

The process for finalizing an IRP and drafting the document does not occur until much closer to filing the IRP and would likely result in filing delays. Three months prior to the filing of the IRP the company is heavily focused on modeling and thus would not have begun drafting a plan that could be shared. In addition, as the Commission is aware, PacifiCorp is a multi-jurisdictional utility and providing a draft to the Commission three months prior to filing would interrupt the other regulatory proceedings that PacifiCorp is subject to with respect to its IRP. PacifiCorp incorporates the regulatory requirements and feedback from all six states that it operates in into the IRP; in order to facilitate this process it is important for the company to receive feedback from all states on the same timeline.

For these reasons, Pacific Power respectfully requests that the Commission grant Staff Petition but without requiring that the company file a draft IRP in 2021. Instead, the company will engage with Staff and all stakeholders through its established process.

Please direct questions to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/

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