



**NW Energy Coalition**  
*for a clean and affordable energy future*

May 3<sup>rd</sup>, 2021

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

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

Mr. Johnson;

The NW Energy Coalition ("NWECC" or "Coalition") appreciates the opportunity to comment on the portions of the incomplete Integrated Resource Plan ("IRP") submitted by PacifiCorp ("PAC") on April 4<sup>th</sup> of this year.

The Coalition is both puzzled and disappointed that PAC has not been able to meet several deadlines for submitting the draft and final versions of its IRP. The most recent submission lacks a preferred portfolio, a Clean Energy Action Plan (CEAP), all scenarios, sensitivities, appendices and attachments, and therefore does not meet the IRP requirements as defined in the Clean Energy Transformation Act (CETA) at RCW 19.280.030(1) and WAC 480-100-620.

The Coalition submitted no substantive comments on the material PAC submitted on January 4<sup>th</sup>, as we found insufficient information to comment upon. The April submission offers almost no new data from the previous submission, and the difficulty in providing substantive comments remains.

The IRP and the CEAP are important documents, as they set the stage for the Clean Energy Implementation Plan (CEIP) due at the latest by the end of the year. PAC has indicated they encountered modeling challenges with PLEXOS, PAC's new portfolio development tool and those problems prevented PAC from meeting the deadlines. Now PAC states the IRP will be submitted by September 1, 2021, but that is one month after the submission date the Commission established for the CEIP, a draft of which is due to the Commission by August 1, with the final due October 1, 2021.

NWEC supports the staff's proposal for PAC to take specific steps to comply with CETA's IRP requirements. It is important to keep this process moving, and to hold the utilities accountable for the planning requirements and schedule the Commission adopted in 2020. More than two years after the passage of CETA, and with five additional months for analysis than the other IOUs, we would expect the steps recommended by staff to be thoroughly completed before the Commission considers a CEIP filing. Since there will be little time for the Commission and stakeholders to review the IRP before the CEIP is presented, it is even more important that PAC provide transparency in all data, calculations and assumptions, in order for other stakeholders to be able to review and comprehend the documents.

We look forward to PAC's presentation to the Commission on the 25<sup>th</sup> and working with both the staff and PAC to ensure PAC meets the compliance requirements of CETA.

Respectfully,

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