

November 8, 2019

VIA ELECTRONIC FILING

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

Re: Docket UE-180259—Pacific Power's 2019 IRP—Second Supplemental Filing
On October 18, 2019, Pacific Power & Light Company (Pacific Power), a division of Pacific Poper,

submitted its 2019 Integrated Resource Plan (2019 IRP) with the Washington Utilities and Transportation Commission. On October 25, 2019, the company filed its first supplement to the 2019 IRP with additional information and clarifying changes in Volume II – Appendices A-L, and clarifying changes and a value correction in Volume II – Appendices M-R.

PacifiCorp identified the need for additional corrections within the 2019 IRP. Enclosed as a second supplement to the 2019 IRP are replacement PDFs incorporating the corrections summarized in the table below to Volume II – Appendices A-L and Volume I – Chapter 5. Regarding the work papers that were filed October 25, 2019, the company also seeks to replace certain files listed below with those provided in this second supplemental filing. The identified corrections and replacement files do not affect the analysis, preferred portfolio, inputs or outcomes of the 2019 IRP, and do not affect any other materials provided.

PacifiCorp 2019 IRP Volume II Appendices A-L and Volume I Chapter 51			
Reference	Update	Page	
Appendix L	Replacement pages correct the data in the standard deviation column and the upper tail column of Tables L.11 through L.23.	248-253	
Appendix L	Replacement page corrects the data in Table L.55 to reflect initial cases P-16 through P-20 under social cost of carbon. This table was incorrectly populated with initial cases P-45CP through P-53CP.		
Appendix L	Replacement page corrects the data in Table L.59 and Table L.60 to correct total PVRR.	266	
Appendix L	Replacement page corrects the data in Table L.65 to correct total PVRR for the P70-P74 confirmation cases.	269	
Chapter 5	Replacement page corrects graphic of winter system capacity trends.	120	

Please find enclosed a data drive containing the second supplement confidential work papers and second supplement non-confidential work papers outlined in the table below. Please replace the

¹ Corrections are incorporated in the publicly posted version of the 2019 IRP available at: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resourceplan/2019_IRP_Volume_II_Appendices_A-L.pdf and https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resourceplan/2019 IRP Volume I.pdf.

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files as described in the table below that were previously provided on October 25, 2019, with the files provided in this filing. Replacements for confidential files remain confidential.

Delete from 1st Supplement	2019 IRP Data Disc Location	Replace with
Tbl L.1-L.64 Stochastic Simulation Results.xlsx	\Public\Chapters + Appendices\Appendix L - Stochastic Simulation Results	Tbl L.1-L.65 Stochastic Simulation Results 2nd Supp.xlsx
Folder and contents: P_I19- P26CNW-MMR_CONF	\Confidential\Planning & Risk_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases Conf\Model Input + Output_CONF\P_I19-P26CNW-MMR_CONF\	Folder and Contents: P_I19- P26CNW-MMR_CONF 2nd Supp
Folder and contents: I19- P26CNW-MMR	\Confidential\System Optimizer Output_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases_CONF\Model Input + Ouptut_CONF\I19- P26CNW-MMR_CONF\	Folder and contents: I19-P26CNW-MMR CONF 2nd Supp
PaR Stochastic Summary P_I19- P26CNW-MMR _1909300244_CONF.xlsm	\Confidential\Planning & Risk_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases Conf\PaR Summary Report_CONF\	PaR Stochastic Summary P_I19- P26CNW-MMR _1910011720 CONF 2nd Supp.xlsm
PaR_Detail_Report_P_I19- P26CNW- MMR_2019101_CONF.xlsm	\Confidential\Planning & Risk_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases Conf\PaR Detail Report_CONF\	PaR_Detail_Report_P_I19- P26CNW-MMR_2019103 CONF 2nd Supp.xlsm
SO Portfolio I19-P22- MM_1909251150_CONF.xlsm	\Confidential\System Optimizer Output_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases_CONF\SO Summary Report Pre- Reliability_CONF\	SO Portfolio I19-P22CNW- MM_1909290011 CONF 2nd Supp.xlsm
SO Portfolio I19-P23- MM_1909261445_CONF.xlsm	\Confidential\System Optimizer Output_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases_CONF\SO Summary Report Pre- Reliability_CONF\	SO Portfolio I19-P23CNW- MM_1909290013 CONF 2nd Supp.xlsm
SO Portfolio I19-P25- MM_1909251201_CONF.xlsm	\Confidential\System Optimizer Output_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases_CONF\SO Summary Report Pre- Reliability_CONF\	SO Portfolio I19-P25CNW- MM_1909290020 CONF 2nd Supp.xlsm
SO Portfolio I19-P26- MM_1909251203_CONF.xlsm	\Confidential\System Optimizer Output_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases_CONF\SO Summary Report Pre- Reliability_CONF\	SO Portfolio I19-P26CNW- MM_1909290025 CONF 2nd Supp.xlsm
SO Portfolio I19-P29- MMR_1909261504_CONF.xlsm	\Confidential\System Optimizer Output_CONF\Gateway and No Gas Cases_CONF.zip\Gateway and No Gas Cases_CONF\SO Summary Report Reliability_CONF\	SO Portfolio I19-P26CNW- MMR_1910021007 CONF 2nd Supp.xlsm

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 81.77.210.² Specifically, the files contain competitively sensitive and proprietary information including contract pricing, detailed load forecasts, and detailed resource cost data and third-party

² 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.

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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
PacifiCorp
Senior Attorney
Pacific Power

Senior Attorney
Pacific Power

Portland, OR 97232 825 NE Multnomah Street, Suite 2000

washingtondockets@pacificorp.com Portland, OR 97232

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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

By regular mail: Data Request Response Center

PacifiCorp

825 NE Multnomah Street, Suite 2000

Portland, OR 97232

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/

Etta Lockey Vice President, Regulation Pacific Power & Light Company 825 NE Multnomah Street, Suite 2000 Portland, OR 97232 (503) 813-5701 etta.lockey@pacificorp.com

Enclosure