

**BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PACIFICORP, d/b/a Pacific Power &  
Light Company,

Petitioner

DOCKET NO. UE- \_\_\_\_\_

PacifiCorp's Petition for Modification of  
Filing Date for its Integrated Resource Plan  
Pursuant to WAC 480-100-238

1. Pursuant to WAC 480-100-238(4) and WAC 480-07-370(b), PacifiCorp d/b/a Pacific Power & Light Company (Company) petitions (Petition) the Washington Utilities and Transportation Commission (Commission) for a modification of the date for filing the Company's Integrated Resource Plan (IRP) in accordance with WAC 480-100-238. In support of this Petition, the Company states:
2. PacifiCorp is an electric company and public service company in the State of Washington within the meaning of RCW 80.04.010, and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Washington. PacifiCorp provides electric service to approximately 132,000 retail customers in Washington.
3. PacifiCorp's name and address:  

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4. WAC 480-100-238(4) states, "Unless otherwise ordered by the commission, each electric utility must submit a[n] [IRP] within two years after the date on which the previous plan

was filed with the commission. Not later than twelve months prior to the due date of a plan, the utility must provide a work plan for informal commission review.” On August 8, 2008, the Company filed a petition requesting an amendment to the filing date for its IRP to more closely align the IRP process with the business planning process and modified modeling procedures. In Order 01, Docket UE-081475, the Commission granted the petition, making the Company’s IRP filing date March 31 of each odd numbered year. Accordingly, the Company’s IRP is currently due March 31, 2013.

5. Recent actions by the United States Environmental Protection Agency (EPA), described more fully below, prompted the Company to modify the schedule for modeling efforts underway to prepare the 2013 IRP. As a result, the Company determined that additional time is needed to account for the modified modeling schedule. The Company understands the Commission’s reluctance to grant extensions of time to file IRPs, as expressed in Order 01, Docket UE-070117. However, in the interest of filing a complete IRP at one time rather than submitting periodic updates, the Company is filing this petition to request a one-time extension for filing the IRP. The Company proposes filing the IRP by April 30, 2013.
6. The EPA’s proposed action on the Arizona Regional Haze State Implementation Plan (SIP) was published in the Federal Register on July 20, 2012. While the Arizona Regional Haze SIP concluded that the low-nitrogen oxide burners at PacifiCorp’s Cholla Unit 4 were sufficient to meet the Best Available Retrofit Technology requirements under the Clean Air Act, the July 20, 2012, EPA proposal required the installation of selective catalytic reduction at an emission rate of 0.05 pounds per British thermal unit for Cholla Unit 4. On December 5, 2012, the EPA approved in part and disapproved in part

Arizona's Regional Haze SIP, revising the proposed emission limits for Cholla Unit 4 to include emissions averaging at a rate of 0.055 pounds per British thermal unit with Cholla Units 2 and 3 (which are owned and operated by Arizona Public Service). The Cholla Unit 4 emissions control requirements and associated assumptions will now be captured in PacifiCorp's IRP base case modeling runs.

7. In Wyoming, pursuant to a Consent Decree entered by the United States District Court for the District of Colorado (Court) on September 27, 2011 (Dkt. No. 67), the EPA was required to take final action on the Wyoming Regional Haze SIP by October 15, 2012. That Consent Decree deadline was moved to December 14, 2012 by EPA with agreement of WildEarth Guardians, a party to the Consent Decree. On December 10, 2012, the EPA filed an unopposed motion to again modify the Consent Decree deadlines for taking action on the Wyoming Regional Haze SIP. EPA's motion sought to modify the Consent Decree to allow it to re-propose, on or before March 29, 2013, a rule to govern compliance with Regional Haze implementation plan requirements under the Clean Air Act for the state of Wyoming. On December 13, 2012, the Court granted EPA's request for an extension. Consistent with EPA's request, EPA now has until March 29, 2013 to re-propose a Regional Haze implementation plan compliance rule and until September 27, 2013 to take final action on the rule. EPA will be evaluating new cost and visibility analyses for several of PacifiCorp's units and will take public comment on the new information.
8. After revision of the October 15, 2012 deadline for EPA's action and in anticipation of the EPA's revised deadline of December 14, 2012 to take final action on the Wyoming Regional Haze SIP, PacifiCorp suspended the modeling work it was doing in preparation

of the 2013 IRP, intending to re-start the modeling once EPA's final action was made available and its impacts were assessed. PacifiCorp was concerned that it would not be an efficient use of time and resources to continue to perform its modeling based on a set of assumptions that could almost immediately change as a result of EPA's final action. PacifiCorp's intention was to incorporate the latest information from EPA's final action into the IRP modeling.

9. Given that EPA has now requested and received additional time to re-propose action on the Wyoming Regional Haze SIP and that the re-proposed action will not be undertaken in sufficient time to allow PacifiCorp to incorporate those results into its modeling, no modifications to the base case Regional Haze compliance assumptions for Wyoming are necessary, and PacifiCorp will re-initiate its modeling efforts for the 2013 IRP. The Company will include the EPA's previously proposed action on the Wyoming SIP in the 2013 IRP stringent case modeling runs.
10. PacifiCorp will modify its base case Regional Haze compliance assumptions for the 2013 IRP to incorporate EPA's final actions on the Arizona Regional Haze SIP, to include the addition, by the end of 2017, of a selective catalytic reduction system on Unit 4 of the Cholla plant.
11. In addition, PacifiCorp will update its forward price curve information so that base case assumptions align with the September 2012 official forward price curve, rather than the June 2012 official price curve, as well as with the most current projections of high and low natural gas prices and coal costs.
12. Based on the foregoing, PacifiCorp respectfully requests a one-month extension of the filing of its 2013 IRP for a new filing date of April 30, 2013. This extension will ensure

that stakeholders have reasonable time to review the 2013 IRP model results prior to selecting a preferred portfolio and prior to the filing of the 2013 IRP. In addition, the extension will allow PacifiCorp to incorporate a discussion of EPA's re-proposed actions on the Wyoming state implementation plan, expected to occur March 29, 2013.

10. Allowing this modification to the Company's IRP filing for 2013 is in the public interest. This will allow the Company to provide the most current analyses of the effects of recent developments in federal environmental laws, specifically the regional haze rules under the Clean Air Act, and will allow for timely public review of such analysis.
11. For these reasons, the Company respectfully requests that the Commission modify the filing deadline to April 30, 2013 for the 2013 IRP filing. The Company discussed this proposal with Commission staff. Staff indicated it supported a revised IRP filing date, and recommended that the Company file this Petition. The Commission may grant a modification of its rules "if consistent with the public interest, the purposes underlying the regulation, and applicable statutes." WAC 480-07-110(1). The Company's Petition meets these standards.

DATED: this 8th day of January, 2013.

Respectfully submitted,

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Mary M. Wiencke  
Pacific Power & Light Company

Counsel for PacifiCorp