

September 1, 2021

VIA ELECTRONIC FILING

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

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UTIL. AND TRANSP.
COMMISSION

RE: Docket UE-200420—PacifiCorp’s 2021 Integrated Resource Plan

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) submits for filing its 2021 Integrated Resource Plan (2021 IRP) with the Washington Utilities and Transportation Commission (Commission). This filing is submitted in accordance with WAC 480-100-625 and Order 02 in docket UE-200420.¹ The 2021 IRP contains information outlining how PacifiCorp has addressed each of the procedural and substantive elements of the Commission’s rules (*see* Appendix B-IRP Regulatory Compliance, Tables B.2 and B.5). The 2021 IRP is also available electronically on PacifiCorp’s website at: www.pacificorp.com/energy/integrated-resource-plan.html.

Consistent with the Company’s previous IRP filings, PacifiCorp will also be submitting electronic files that will provide supporting information for the analyses included in the 2021 IRP; these electronic files will be provided on USB drives by September 15, 2021. The electronic files will include confidential materials provided on a separate USB under WAC 480-07-160. These confidential materials 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 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 PacifiCorp is required to incur greater costs associated with providing electric service.

PacifiCorp plans to supplement its filing with results of its 2021 IRP sensitivity studies no later than September 30, 2021. A post-IRP filing public-input meeting has been scheduled October 1, 2021 to provide an opportunity for stakeholder discussion on the organization of the workpapers in the electronic files and results of the sensitivity studies.

¹ *In the Matter of the Petition of PacifiCorp d/b/a Pacific Power & Light Company, Regarding 2021 Integrated Resource Plan Compliance*, Docket No. UE-200420, Order 02 (June 10, 2021).

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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Interested parties, other than Commission staff, may contact Carla Scarsella (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
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Senior Attorney
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It is respectfully requested that all formal data requests regarding this filing be addressed to the following:

By email (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/

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Enclosures

200420-PPL-2021-IRP-Volume-I-9-1-21.pdf
200420-PPL-2021-IRP-Volume-II-9-1-21.pdf
200420-PPL-COS-9-1-21.pdf