

January 4, 2021

***VIA ELECTRONIC FILING***

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
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**Re: Docket UE-200420 – PacifiCorp Draft 2021 Integrated Resource Plan (IRP) Filing**

In accordance with Order 03 of docket UE-180259 and in compliance with requirements of the Clean Energy Transformation Act (CETA)<sup>1</sup>, PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp), submits the enclosed draft of its 2021 IRP (Draft 2021 IRP). PacifiCorp has included the following components as part of this filing:

- **Draft IRP Document**, which includes the following draft sections available to date:
  - Overview
  - Planning Environment
  - Transmission
  - Load and Resource Balance
  - Resource Options
  - Modeling and Portfolio Evaluation Process
  - Description of Action Plan and Resource Procurement
  - Draft Appendix A – Load Forecast Details
  - Draft Appendix B – IRP Regulatory Compliance
  - Draft Appendix C – Public-input process
  - Draft Appendix O – Private Generation Study
  - Draft Appendix R – Clean Energy Action Plan
  - Draft Appendix S – List of Acronyms
- **Attachment A** – Supporting materials presented to date as part of the 2021 IRP public-input meetings;
- **Attachment B** – Stakeholder Feedback Forms and PacifiCorp’s responses throughout the 2021 IRP development cycle (as of December 31, 2020); and
- **Attachment C** – Draft Washington Utilities and Transportation Commission Compliance Matrix.

PacifiCorp began development of its 2021 IRP in January 2020 with a series of technical workshops focused on energy efficiency assumptions which are derived from an updated conservation potential assessment. Subsequently, PacifiCorp began a series of more general public-input meetings in June 2020, which addressed a range of topics describing PacifiCorp’s modeling methodology and inputs and assumptions for the 2021 IRP. Agenda items covered

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<sup>1</sup> WAC 480-100-625(3)

topics including, but not limited to, resource cost-and-performance assumptions, load forecast, price-policy scenarios, market price assumptions, and transmission options that will be considered as part of the 2021 IRP. All public-input meeting materials are included in supporting materials to this filing in Attachment A, with responses to stakeholder feedback forms finalized as of December 31, 2020 included as Attachment B.

As has been discussed in several sets of comments filed in Docket UE-191023 and in informal conversations with staff of the Washington Utilities and Transportation Commission (Commission Staff), PacifiCorp's multi-state IRP development process does not currently align well with the newly-adopted IRP and CEIP rules, including draft IRP filing requirements. For example, due to the progressive nature of PacifiCorp's multi-state IRP development process, PacifiCorp is just beginning the modeling phase of the 2021 IRP, which necessarily follows the process of updating inputs and assumptions. In addition, PacifiCorp has been working to implement new modeling software for the 2021 IRP, which has added workload to the 2021 IRP development process. As a result, PacifiCorp has not completed any model runs used to establish resource portfolios and to evaluate costs and risks at this time. The company is working to produce preliminary modeling results for discussion at its upcoming January 28-29, 2021 public-input meeting. Going forward, PacifiCorp will improve the timing of its IRP development process in light of Washington's recently adopted IRP and CEIP rules.<sup>2</sup>

PacifiCorp has been meeting with Commission Staff on a bi-weekly basis for the last five months to discuss the company's Draft 2021 IRP, as well as its modeling approach, planning assumptions, and how to incorporate new CETA-related requirements. Throughout these conversations, PacifiCorp has been clear with regard to the information and analysis that will and will not be available in the initial Draft 2021 IRP. PacifiCorp has also worked with Commission Staff to identify additional information and analysis that will be available during the pendency of the Commission's review of the Draft 2021 IRP. These conversations have been extremely helpful and PacifiCorp appreciates the Commission's stated intention to provide flexibility for utilities as they move through the various stages of their 2021 IRP filings.<sup>3</sup>

PacifiCorp looks forward to providing its final 2021 IRP to the Commission on April 1, 2021.

PacifiCorp respectfully requests that all communications related to this proceeding be sent to the following:

By Email: [WashingtonDockets@pacificorp.com](mailto:WashingtonDockets@pacificorp.com)  
[IRP@pacificorp.com](mailto:IRP@pacificorp.com)

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

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<sup>2</sup> Adopted in Washington General Order R-601. PacifiCorp is not seeking a waiver of any of the newly-adopted rules at this time but may consider such a waiver, if necessary.

<sup>3</sup> Dockets UE-190698 and UE-191023 (consolidated), General Order R-601, page 59 (December 28, 2020).

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By e-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah St., Suite 2000  
Portland, OR 97232

Please direct informal inquiries to Ariel Son, Washington State Regulatory Manager, at (503) 813-5410.

Sincerely,

/s/

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