



September 30, 2021

VIA ELECTRONIC FILING

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Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
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 COMMISSION

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

As a supplement to the 2021 Integrated Resource Plan (IRP), PacifiCorp d/b/a Pacific Power and Light Company (PacifiCorp or Company) has prepared the enclosed analysis detailing sensitivity cases. In addition to the studies developed as part of the portfolio-development process supporting selection of the preferred portfolio, additional sensitivity cases were conducted to better understand how certain modeling assumptions influence the resource mix and timing of future resource additions. These sensitivity cases are useful in understanding how PacifiCorp’s resource plan would be affected by changes to uncertain planning assumptions and to address how alternative resources and planning paradigms affect system costs and risk. The information presented in the sensitivity cases does not impact the preferred portfolio or other top-performing portfolios presented in PacifiCorp’s IRP filing.

Per the Company’s transmittal letter accompanying the September 1, 2021 IRP filing, PacifiCorp has scheduled a post-IRP filing public-input meeting for October 1, 2021, to provide an opportunity for stakeholder discussion on the organization of the workpapers on the data discs and results of the sensitivity studies.

By no later than October 1, 2021, the Company is also submitting electronic files to replace those provided with the September 15, 2021 filing; these electronic files will be provided a box.com transfer. 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 81.77.210.¹ 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.

¹ 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.

The electronic files provided in this filing contain both confidential and non-confidential workpapers supporting the analyses included in the 2021 IRP, corrected and augmented as follows:

The following two files for Appendix K were provided on the confidential (CONF) disc, but are non-confidential and have been moved to the non-confidential Appendix K folder:

- K1 K2 Cap Contribution of Wind and Solar.xlsx
- K1 K2 Wind and solar correlation figures_2021 04 22 CONF.xlsm

By oversight, the following three confidential files for Appendix K were not previously provided, but have now been provided in the Appendix K folder on the confidential data disc:

- 2030 ENS results index 13668 - storage duration CONF.xlsm
- 2030 ENS results index 13668 CONF.xlsm
- Resource Capacity Contribution 2030 CONF.xlsm

The ST Cost Summary workpapers were found to have formula errors resulting in incorrect values being reported. All ST Cost Summary workpapers have been replaced with corrected workpapers. This was the result of a reporting error only and this correction to workpapers does not change any values reported in the published 2021 IRP or associated analysis.

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

Sincerely,

/s/

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Enclosure
200420-PPL-Sensitivity-Studies-9-30-21
200420-PPL-COS-9-30-21