

**Exh. JNS-19
Docket UE-210829
Witness: Jaclynn N. Simmons**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFICORP d/b/a PACIFIC POWER
& LIGHT COMPANY,**

Respondent.

DOCKET UE-210829

EXHIBIT TO TESTIMONY OF

JACLYNN N. SIMMONS

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Staff's Recommended Conditions List

August 21, 2024

PacifiCorp's Biennial Clean Energy Implementation Plan Update

Conditions List

1. Public Participation Plan- PacifiCorp will provide an updated Public Participation Plan that initiates the action items contained in the Suggested Actions section of Staff's January 11, 2024, Comments in Docket 210829 and identified in subparts (1) & (2), below, filed in this docket.

(1) PacifiCorp must define processes, methods, participation, and communication objectives by asking the questions listed on page 18 of Staff comments. In addition to existing Company methods, the Company should reach out to the general customer base through bill inserts, breakout rooms at CEIP public participation meetings, open houses, go-to-you meetings, and through the Company's EAG partners. The Company should identify and address diverse participation barriers. Including a comprehensive assessment of cultural, economic, and other barriers and a plan to ensure that all customers, regardless of barriers, can participate.

1. (2) PacifiCorp should develop a comprehensive forward-looking plan that outlines specific actions and milestones for public participation throughout the CEIP period.

Due Date: May 1, 2025¹ in the PPP.

2. Allocation Methodology- For all future CEIP filings, including the 2025 CEIP, PacifiCorp shall use the allocation methodology that is formally approved by the

¹ WAC 480-100-655(2).

1 Commission at the time of the CEIP filing. This directive applies to all subsequent CEIPs
2 and IRPs 2025 and beyond.

- 3 i. Additionally, in the Company's next general rate case, PacifiCorp will
4 submit several new allocation methodology options. Each option will
5 include an increase (from what the WIJAM currently allocates) in the
6 allocation of renewable and non-emitting resources to Washington from.
7 In addition to presenting several different methodology options for
8 increasing the allocation of renewable and non-emitting resources to
9 Washington, the Company shall provide power cost modeling for each
10 methodology option presented to allow for the evaluation of the potential
11 rate impact of each.

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13 2. **IRA/IIJA**-The Company shall incorporate the guidance in the Commission's recently
14 issued policy statement from U-240013. Specifically, PacifiCorp must incorporate
15 applicable updates in modeling, cost assumptions, reporting, and impacts identified
16 within the Policy Statement, and any revisions that follow, including those found in
17 Appendix A:

18 (1) PacifiCorp shall provide a narrative within the target section explaining how IRP
19 assumptions related to IRA and IIJA funding sources helped inform utility targets; for
20 specific targets, EE and DR should include increased potential from additional end uses
21 resulting from federal funding of building and transportation electrification.

22 (2) The CBI section, which contains an equity analysis, should include a comparison of
23 the Justice40 and Washington state geographical similarities for utility outreach and

1 potential projects.

2 (3) Specific Actions should contain specific resources or projects the utility is evaluating
3 for IRA and IIJA funding opportunities with a narrative describing the utility's evaluation,
4 CBA, and identification of projects they intend to seek funding for.

5 (4) Costs should include the range of potential IRA and IIJA dollar benefits given the
6 specific actions (these should be net benefits after any required matching).

7 (5) The Public Participation Plan should include a narrative regarding the IOUs efforts in
8 educating its advisory groups about IRA/IIJA and sharing information during public
9 engagement opportunities.

10 (6) Tracking and reporting (Appendix A) will be submitted when the CEIP is submitted.

11 (7) PacifiCorp will seek out partnerships with Tribal Governments for input to maximize
12 IRA and IIJA benefits.

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14 Additionally, PacifiCorp must model a maximum potential IRA benefit (this would
15 include EIR, Grants, tax credits, and bonuses) to use as a benchmark for other potential
16 scenarios; for instance, comparing customer savings, emissions reductions, and unit
17 retirements.

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19 Due: Starting in the 2025 IRP (due March 31, 2025), CEIP (due October 1, 2025), and
20 beyond.

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3. Resource Acquisition- PacifiCorp shall submit a detailed plan detailing how:

(a) how PacifiCorp is going to meet CETA compliance, specifically the 80 percent by 2030 CETA requirement;

(b) how it intends to acquire resources to fulfill that plan outside of the 2022 all-source request for proposals (ASRFP);

(c) what resources the Company has already acquired, in nameplate MWs and projected annual MWh (both total, and Washington customer allocation per WIJAM);

(d) when energization will occur and when the projected resources are expected to be online (i.e., commercial operation dates) for new resources, or contract start dates for existing resources;

(e) outline the steps taken to ensure equity is considered throughout the acquisition process; and

(f) outline all steps taken to ensure that the acquisition of resources happens at the lowest possible cost.

Due Date: The plan shall be sent to the Commission 90 days after issuance of the order by the Commission in this docket.

4. 2025 Resource Acquisition- PacifiCorp shall not terminate, cancel, or suspend any RFP

that results from resource needs identified in the 2025 IRP. All prudency decisions will

1 be determined by the Commission in a general rate case or other appropriate filing such
2 as annual power cost adjustment filings.

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4 **Interim Targets** -Staff recommends a condition for the Company to submit a CEIP with
5 an interim target of at least 73% by the end of 2029, under the currently approved CEIP.
6 Due: 2025 CEIP, on or before October 1, 2025.

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9 **5. Minimum Designation and Program Design Regarding Distributed Resources-**

10 **Minimum Designations:** PacifiCorp in its 2027 Biennial CEIP Update is to work with
11 its Advisory groups to designate for Named Communities a minimum of 27% of the
12 energy benefits of its DR, DER, and EE (including Community solar and other DER
13 programs) programs with the benefits measured across each portion of resources.

14 PacifiCorp will commit to developing a targeted approach to identify the customers and
15 Named Communities in consultation with interested persons and advisory groups. By the
16 2027 Biennial CEIP Update, PacifiCorp will designate a minimum of 27% energy
17 benefits that will flow to Named Communities. (*e.g. is below in program design)

18 **Program Design:** To implement the 27% energy benefit minimum designations for
19 Named Communities, PacifiCorp, along with input from its Equity Advisory Group, will
20 continue to develop mechanisms to ensure that its individual EE and DR programs are
21 offered (including solar and storage) and available to serve customers in Named
22 Communities, including carve-outs for program costs (e.g. outreach/education).

23 PacifiCorp will also develop/modify any future/current program designs in consultation

1 with the Company's DSM and Equity Advisory Groups to better ensure benefits flow to
2 Named Communities. The allocation of costs among customer rate classes shall be
3 determined in an appropriate rate proceeding before the Washington Utilities and
4 Transportation Commission.

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6 *(e.g. if benefits total 30%, then 27% of that 30% will be flowing to the Named
7 Communities. Or, if there is 0% customer participation in all EE and DR then 0% will
8 flow. This does not require the Company to have a certain percentage of customers
9 participating, it is out of the customer participation the Company does have and then a
10 percentage of those benefits will flow to Named Communities).

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12 Due: 2025 CEIP, on or before October 1, 2025.

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14 **6. Resource Adequacy.** -Identify and explain an appropriate resource adequacy requirement
15 and measurement metrics consistent with RCW 19.405.030 through 19.405.050.

16 PacifiCorp must:

17 (1) explain the specific method used to calculate capacity if ELCC was not used;

18 (2) include a qualitative and quantitative analysis showing how it improves the time
19 dynamic aspects of its firm capacity calculations; and

20 (3) explain if there were any other incremental improvements to the Company's previous
21 methods and metrics.

22 Due: This directive applies to all subsequent CEIPs and IRPs 2025 and beyond.

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