

**Exh. JNS-20
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**

***NewsData Article: OPUC: PacifiCorp Faces '2-to4 GW' Shortfall
Ahead of 2030 GHG Reduction Target***

August 21, 2024

https://www.newsdata.com/clearing_up/courts_and_commissions/opuc-pacifcorp-faces-2--to-4-gw-shortfall-ahead-of-2030-ghg-reduction-target/article_d4a60d3c-55db-11ef-bb8a-9bc815ecc25f.html

TOP STORY

OPUC: PacifiCorp Faces '2- to 4-GW' Shortfall Ahead of 2030 GHG Reduction Target

by Greg Mason
Aug 9, 2024



Leaning Juniper Wind.
Russell Young/Pacific Power

The Oregon Public Utility Commission told PacifiCorp to improve efforts to reach the state's emissions reduction 2030 target, citing its current non-emitting resource shortfall of 2 to 4 GW.

PacifiCorp has not made sufficient progress to meet that mandate, the OPUC concluded Aug. 8. Commissioners reached that formal determination following a staff and stakeholder review of PacifiCorp's 2023 integrated resource plan and clean-energy plan.

With the CEP—a measure created three years ago by Oregon House Bill 2021—PacifiCorp must set goals for meeting the state's clean-energy targets while evaluating costs and opportunities associated with replacing fossil fuels with community-based renewable energy.

The commission noted that the utility's emissions reduction efforts outlined in the 2023 IRP/CEP stalled when it canceled its 2022 all-source request for proposals. The RFP was suspended in September due to factors such as uncertainty surrounding the federal ozone transport rule along with wildfire risk and liability costs (Clearing Up No. 2127).

Despite PacifiCorp measures that included a 12.6-percent emissions reductions from 2019 through 2022, and 1,900 MW of new renewables that have come on line or will come on line by 2026, OPUC was ultimately unconvinced these actions were sufficient evidence to represent continual progress toward HB 2021 mandates.

"In order to put this into context, we are five years away from our first emissions reduction milestone with House Bill 2021," OPUC Administrator JP Batmale said during the commission's Aug. 8 meeting. "PacifiCorp is facing something of a 2- to 4-GW shortfall in nameplate capacity in non-emitting resources, depending on how you do the calculations, and we don't have a plan before us that provides us any sort of meaningful way to address that shortfall as soon as [practicable]."

Commissioner Les Perkins said, "I think the CEP update as well as the IRP update move in the wrong direction, and they rely on modeling assumptions that are tenuous at best. I think there are ideas put forward on how to achieve compliance, but there's no actual plan or pathway laid out that makes continual progress on a timeline that could realistically meet the state goals and requirements."

As part of their Aug. 8 determination, the commissioners directed PacifiCorp to include an executable action plan within the company's 2025 CEP, incorporating the costs, benefits and tradeoffs of actual activities taken in order to meet HB 2021 goals.

In addition, the commissioners directed staff to open a new docket that will culminate with ordering PacifiCorp to issue an RFP at a future date. The scope of the RFP will be determined in that docket.

Finally, the commissioners directed PacifiCorp to submit a small-scale renewable resource acquisition strategy by April 2025. HB 2021 requires 10 percent of PacifiCorp's aggregate electrical capacity to come from small-scale renewables, which are projects of 20 MW or less, by 2030.

Rick Link, senior vice president of resource planning, procurement and optimization at PacifiCorp, told the commissioners Aug. 8 that the company's current trajectory envisions filing a draft 2025 IRP at the start of next year, followed by a final draft on March 31 with the draft 2025 all-source RFP shortly after. The 2025 RFP would then be issued to the market later next year.

"I truly believe marching down the path would've been pretty reckless with everything we knew," Link said about canceling the 2022 RFP. "It was the only option we had in my opinion. We needed to suspend it, get our ducks in a row, reassess, reevaluate."

Greg Mason

Staff Writer