



**ROCKY MOUNTAIN
POWER**

A DIVISION OF PACIFICORP

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1407 W North Temple, Suite 330
Salt Lake City, Utah 84114

2019 NOV 14 AM 11:10

IDAHO PUBLIC
UTILITIES COMMISSION

November 13, 2019

VIA OVERNIGHT DELIVERY

Diane Hanian
Commission Secretary
Idaho Public Utilities Commission
11331 W Chinden Blvd
Building 8 Suite 201A
Boise, Idaho 83714

PAC-E-19-14

**RE: NOTICE OF PACIFICORP'S INTENT NOT TO FILE A 2019 INTEGRATED
RESOURCE PLAN UPDATE**

Dear Ms. Hanian:

Order No. 22299 required Rocky Mountain Power, ("Company"), to file biennial Integrated Resource Plans, ("IRPs"). That filing requirement was reaffirmed in Order No. 27835 when the Commission directed the Company to file an IRP in December 2000 and every two years thereafter. Later Order No. 30262 authorized the Company to file all future IRPs by the last business day of March on a biennial basis beginning in 2009. Order No. 34404 authorized PacifiCorp's postponed filing of the 2019 IRP on October 18, 2019, rather than the last business day of March.

While not required, PacifiCorp has traditionally filed an IRP Update within one year of filing its biennial IRP. PacifiCorp respectfully provides notice that it does not plan on filing a 2019 IRP Update to provide time to focus on the acknowledgement and acceptance of the 2019 IRP and preparation of the 2021 IRP.

The Company does not anticipate receiving orders or written acknowledgements of the 2019 IRP from all of the commissions before March 31, 2020, when it would typically file the 2019 IRP Update. If these orders required the Company to provide certain information in the 2019 IRP Update, the Company probably wouldn't have time to comply with those orders. Additionally, PacifiCorp will be preparing for the 2021 IRP with pre-IRP studies, processes, and preparations for the public-input process that begins around June 2020 in order to file the 2021 IRP at the end of March 2021.

The Company needs time to evaluate and hopefully implement new and improved modeling software. During the 2019 IRP cycle the Company experienced delays due to modeling issues despite being able to improve and expand upon the capabilities of its existing modeling software. The continuous IRP modeling cycle makes it nearly impossible to conduct an evaluation and implementation of software updates. Not filing the 2019 IRP Update would provide a small window to pursue this much needed effort.

Please feel free to direct any inquiries regarding this matter to Shay LaBray, Director Resource Planning, at (503) 813-6176 or to Ted Weston, Idaho Regulatory Affairs Manager, at (801) 220-2963.

Sincerely,



Joelle Steward
Vice President, Regulation

Enclosures

cc: Jim Yost, Idaho Governor's Office (without enclosures)
Benjamin Otto, Idaho Conservation League (without enclosures)
Mark Stokes, Idaho Power Company (without enclosures)
Teri Carlock, Idaho Public Utilities Commission staff (without enclosures)
Randall Budge, (Monsanto) (without enclosures)
Nancy Kelly, Western Resource Advocates (without enclosures)