

DECISION MEMORANDUM

**TO: COMMISSIONER KJELLANDER
COMMISSIONER RAPER
COMMISSIONER ANDERSON
COMMISSION SECRETARY
COMMISSION STAFF
LEGAL**

**FROM: DAYN HARDIE
DEPUTY ATTORNEY GENERAL**

DATE: NOVEMBER 20, 2019

**SUBJECT: ROCKY MOUNTAIN POWER'S 2019 ELECTRIC INTEGRATED
RESOURCE PLAN; CASE NO. PAC-E-19-16**

On October 25, 2019, PacifiCorp dba Rocky Mountain Power ("Company") filed its 2019 Electric Integrated Resource Plan ("2019 IRP" or "IRP") pursuant to Commission Order No. 22299.

ROCKY MOUNTAIN'S 2019 IRP

The Company's 2019 IRP was developed through comprehensive analysis and public-input. Rocky Mountain 2019 IRP at 1. The 2019 IRP preferred portfolio includes accelerated coal retirements and investment in transmission infrastructure that will facilitate the addition of nearly 11,000 Megawatts ("MW") of new renewable resources, plus the deployment of new technologies, during the 20-year planning period. *Id.*

The primary objective of the Company's 2019 IRP is to identify the best mix of resources to serve customers going forward. *Id.* at 5. The best mix of resources is identified through analysis that measures both cost and risk. *Id.* The least-cost, least-risk resource portfolio—defined as the "preferred portfolio"—is the portfolio that can be delivered through specific action items at a reasonable cost and with manageable risk, while considering customer demand for clean energy and ensuring compliance with state and federal regulatory objectives. *Id.*

The Company's Filing states, "the 2019 IRP sets forth a clear path to provide reliable and reasonably priced service to [its] customers." *Id.* The analysis supporting the IRP helps the Company, customers, and regulators understand the effects of both near-term and long-term resource decisions on customer bills, the reliability of electric service the Company's customers

receive, and changes to greenhouse gas emissions from the electricity generation assets used to serve customers. *Id.* In its 2019 IRP, the Company presents a preferred portfolio that “builds on its vision to deliver energy affordably, reliably, and responsibly through near-term investments in transmission infrastructure that will facilitate continued growth in new renewable resource capacity over the longer-term planning horizon while maintaining substantial investment in energy efficiency.” *Id.*

The Company’s 2019 IRP includes investment in new resource technologies including—renewables, storage, and modern grid technology. *Id.* at 4. It also outlines new transmission investments across the Company’s territory needed to remove existing transmission constraints and improve grid resilience so the lowest-cost renewable resources can be delivered to customers. *Id.*

The Company’s Filing states its 2019 IRP preferred portfolio is supported by comprehensive data analysis and an extensive stakeholder input-process. *Id.* at 29. The Company’s 2019 IRP preferred portfolio continues investments in new wind, transmission, and demand side management, while adding significant solar and battery storage resources. *Id.* By 2025, the preferred portfolio includes nearly 3,000 MW of new solar resources, 3,500 MW of new wind resources, nearly 600 MW of battery storage capacity¹, 860 MW of incremental energy efficiency resources and new direct load control capacity. *Id.*

Over the 20-year planning horizon, the IRP preferred portfolio includes more than 4,600 MW of new wind resources, more than 6,300 MW of new solar resources, more than 2,800 MW of battery storage², and more than 1,890 MW of incremental energy efficiency resources and new direct load control capacity. *Id.*

For delivery of new renewable power to customers, the Company’s 2019 IRP preferred portfolio also includes the construction of a 400-mile transmission line, Gateway south, connecting southeast Wyoming with northern Utah. *Id.*

STAFF RECOMMENDATION

Staff recommends that the Commission issue a Notice of Filing and set a 21 day intervention deadline. Once the intervention deadline has passed, Staff will informally confer with

¹ All storage will be combined with new solar resources.

² More than 1,400 MW of storage capacity consists of stand-alone storage resources being developed beginning in 2028.

the intervening parties about further scheduling and will report their findings back to the Commission.

COMMISSION DECISION

Does the Commission wish to issue a Notice of Filing and set a 21 day intervention deadline?

A handwritten signature in black ink, appearing to read "Dayn Hardie", written over a horizontal line.

Dayn Hardie
Deputy Attorney General

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