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IDAHO PUBLIC  
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February 12, 2021

***VIA ELECTRONIC DELIVERY***

Jan Noriyuki  
Commission Secretary  
Idaho Public Utilities Commission  
11331 W. Chinden Blvd  
Building 8 Suite 201A  
Boise, ID 83714

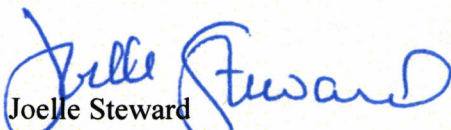
**Re: CASE NO. PAC-E-21-03  
IN THE MATTER OF ROCKY MOUNTAIN POWER'S 2021 INTEGRATED  
RESOURCE PLAN**

Dear Ms. Noriyuki:

Please find attached Rocky Mountain Power's Petition in the above referenced matter.

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Very truly yours,

  
Joelle Steward  
Vice President, Regulation

Emily Wegener  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84116  
Telephone: (801) 220-4526  
FAX: (801) 220-3299  
Email: [emily.wegener@pacificorp.com](mailto:emily.wegener@pacificorp.com)

*Attorney for Rocky Mountain Power*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF ROCKY  
MOUNTAIN POWER'S 2021  
INTEGRATED RESOURCE PLAN**

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**CASE NO. PAC-E-21-03  
PETITION FOR EXTENSION**

**COMES NOW** Rocky Mountain Power, a division of PacifiCorp ("Rocky Mountain Power" or the "Company"), in accordance with Rule 53 of the Idaho Public Utilities Commission's Rules of Procedure ("RP"), hereby petitions the Idaho Public Utilities Commission ("Commission") for an extension of the March 31, 2021<sup>1</sup> filing date of the Company's 2021 Integrated Resource Plan ("IRP"). In support of this request Rocky Mountain Power states as follows:

**I. BACKGROUND**

Per Commission Order No. 22299 issued in Case No. U-1500-165, Rocky Mountain Power biennially files an IRP. That filing requirement was reaffirmed in Order No. 27835 issued in Case No. UPL-E-98-4 when the Commission directed the Company to file an IRP in December 2000, and biennially thereafter. That requirement was later modified in Order No. 30262 issued in Case No. PAC-E-07-03 when the Commission granted the Company's request to file all future IRPs by the last business day of March biennially beginning in 2009.

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<sup>1</sup> The IRP is due on the last business day of March which, in this case, is March 31, 2021.



Rocky Mountain Power has been diligently working on development of its 2021 IRP through a robust, transparent and thorough public-input process. This stakeholder process began in January 2020 with a series of technical workshops focused on energy efficiency assumptions being developed from an updated conservation potential assessment. PacifiCorp began a series of more general public-input meetings in June 2020, which addressed a range of topics describing PacifiCorp's modeling methodology, inputs and assumptions for the 2021 IRP.

Agenda items covered topics including, but not limited to, resource cost-and-performance assumptions, model function and overview, load forecast, price-policy assumptions, market price assumptions, and transmission options considered as part of the 2021 IRP. In addition, PacifiCorp has been working since the summer of 2020 to implement new modeling software for the 2021 IRP. To date, PacifiCorp has held 12 public-input meetings. All public-input meeting materials, available studies conducted and stakeholder feedback forms to date can be found at: [www.pacificorp.com/es/irp.html](http://www.pacificorp.com/es/irp.html).

## **II. TIMING OF 2021 IRP**

Given the current status of the 2021 IRP and the timeline of the on-going 2020 All Source Request for Proposals ("2020AS RFP"), PacifiCorp respectfully requests an extension to file the 2021 IRP from March 31, 2021 to no later than September 1, 2021. The 2020AS RFP is on schedule to have a final shortlist by June 1, 2021. The extension will ensure that the 2021 IRP is aligned with the results of the 2020AS RFP, which can have implications on the Company's resource plan over both the near and long term. Considering that the current filing schedule of March 31, 2021 would require filing the 2021 IRP just two months ahead of establishing a final shortlist in the 2020AS RFP, PacifiCorp believes it is reasonable to delay filing the 2021 IRP so that the results of the 2020AS RFP can be accounted for in the current planning cycle.



At the time of this filing, PacifiCorp has not been able to successfully complete any model runs to establish resource portfolios and to evaluate costs and risks. Consequently, the filing extension will not only ensure the 2021 IRP captures the results of the 2020AS RFP, it will enable PacifiCorp time to: make necessary adjustments to optimize the modeling functionality of its new systems; complete the necessary analysis to develop a least-cost, least-risk preferred portfolio; and allow sufficient time for stakeholder review and input.

PacifiCorp will continue its robust and transparent public-input process with additional monthly public-input meetings to be scheduled up to the extended filing date to provide stakeholders continued opportunity to participate in the 2021 IRP development process focused on the Company's analysis and overall progress. The Company discussed this extension request with stakeholders and provided future public-input meetings dates, including scheduling additional public-input meetings up to the proposed file date extension, during its February 10, 2021 public-input meeting.

### **III. COMMUNICATIONS**

Service of pleadings, exhibits, orders, and other documents relating to this proceeding should be served on the following:

Emily Wegener  
Senior Attorney  
Rocky Mountain Power  
1407 West North Temple, Suite 320  
Salt Lake City, Utah 84111

[Emily.Wegener@pacificorp.com](mailto:Emily.Wegener@pacificorp.com)

Ted Weston  
Manager, Idaho Regulatory Affairs  
Rocky Mountain Power  
201 South Main Street, Suite 2300  
Salt Lake City, UT 84111  
[Ted.Weston@PacifiCorp.com](mailto:Ted.Weston@PacifiCorp.com)

In addition, it is respectfully requested that all formal correspondence and Staff requests regarding this material be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com).

By Fax: (503) 813-6060

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

**IV. MODIFIED PROCEDURE**

Rocky Mountain Power believes that consideration of this petition does not require an evidentiary proceeding, and accordingly the Company requests that this Application be processed under RP 201 allowing for consideration of issues under Modified Procedure, i.e., by written submissions rather than by an evidentiary hearing.

**V. CONCLUSION**

WHEREFORE, based on the foregoing, the Company respectfully requests a five-month extension of the filing of its 2021 IRP from March 31, 2021, to no later than September 1, 2021.

Respectfully submitted this 12<sup>th</sup> day of February, 2021.

By Emily Wegener  
Emily Wegener  
Attorney for Rocky Mountain Power