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UTILITIES COMMISSION

1407 West North Temple, Suite 330  
Salt Lake City, Utah 84116

March 24, 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 reply comments 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  
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*Attorney for Rocky Mountain Power*

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

<b>IN THE MATTER OF ROCKY MOUNTAIN</b>	<b>) CASE NO. PAC-E-20-03</b>
<b>POWER'S 2021 INTEGRATED RESOURCE</b>	<b>)</b>
<b>PLAN</b>	<b>) REPLY COMMENTS OF</b>
	<b>) ROCKY MOUNTAIN POWER</b>

Pursuant to Rule 202.01(d) of the Rules of Procedure of the Idaho Public Utilities Commission ("Commission"), Rocky Mountain Power, a division of PacifiCorp (the "Company") hereby submits reply comments in the above-referenced case.

**I. BACKGROUND**

1. On February 12, 2021, the Company filed a petition requesting an extension to the filing date of the 2021 Integrated Resource Plan ("2021 IRP") to provide additional time: 1) to complete implementation of new modeling software; 2) for robust and inclusive public process once modeling results are known; and 3) to allow for inclusion of short list results from the Company's 2020 All-Source Request for Proposals ("2020 AS RFP") once those results are known.

2. On March 18, 2021, stakeholders to this proceeding filed comments in response to the Company's petition, with Staff of the Idaho Public Utilities Commission ("Staff") recommending the Commission approve the Company's request to file the 2021 IRP no later than September 1, 2021, and Sierra Club also recommending an extension be granted, but only to

July 15, 2021. The Company appreciates Staff's support of the September 1, 2021, extension as described in their comments. These reply comments are specifically in response to Sierra Club.

## **II. REPLY COMMENTS**

7. Sierra Club recommends the Company file the 2021 IRP by July 15, 2021, instead of September 1, 2021, as requested by the Company. In exchange for this extension, Sierra Club recommends the Company be required to provide additional model run information associated with certain hypothetical federal requirements.

8. Following the 2019 IRP, PacifiCorp began a transition to Energy Exemplar's Plexos model. This model provides multiple improvements to the IRP process, including greater granularity, greater ability to model reliability outcomes through inclusion of loss of load probability and planning reserve margin, the ability to include endogenous transmission modeling without including topology additions or other complex setups, and the ability to include greater analysis of resource retirement options.

9. PacifiCorp presented the benefits of the Plexos model to stakeholders during the June 2020 public-input meeting, and the model transition has been ongoing throughout the 2021 IRP development cycle.

10. However, the transition to the new model and the necessary setup activities to ensure model functionality have encountered challenges, which could not have been foreseen until the inputs were set up in the model and the Company could start the portfolio development phase of the 2021 IRP. If granted, the extension to the filing date for the 2021 IRP would provide the Company time to implement and optimize the model and produce model outcomes while allowing for stakeholder review and input.



11. As of today, the Company has been unable to produce any 2021 IRP portfolio results for cost and risk analysis and as such hasn't been able to receive stakeholder input on any modeling results. Extending the filing date for the 2021 IRP to no later than September 1, 2021, allows the Company to incorporate the updated inputs that will occur from the 2020 AS RFP final shortlist with the least disruption possible to the IRP process.

12. As the Company continues to setup the new modeling software and work toward a final shortlist in the 2020 AS RFP, there are variables that stakeholders will need an opportunity to provide input on. As summarized in Table 1, the Company plans to have the first modeling outputs ready to share by late April, with modeling refinements and inputs updated throughout the summer.

13. A filing date of no later than September 1, 2021, for the 2021 IRP will enable stakeholder input on portfolio modeling. The Company could continue the public-input process throughout spring and summer of 2021 and schedule additional public-input meetings. Table 1 reflects the steps the Company will take to achieve a 2021 IRP filing by no later than September 1, 2021.

**Table 1: 2021 IRP Updated Public-Input Schedule/Workplan**

<b>Date</b>	<b>Activity</b>	<b>Tentative Detail</b>
April 22-23, 2021	April Public-Input Meeting	Initial discussion of modeling results; opportunity for stakeholder feedback.
May 27-28, 2021	May Public-Input Meeting	Continued discussion of modeling results and opportunity for stakeholder feedback.
June 24-25, 2021	June Public-Input Meeting	Discussion of portfolios with incorporation of 2020AS RFP final short list results, discussion of cost and risk portfolio analysis; other scenarios / sensitivities; opportunity for stakeholder feedback
July 29-30, 2021	July Public-Input Meeting	Discuss preferred portfolio/cost and risk analysis; remaining scenarios / sensitivities; opportunity for stakeholder feedback.
August 12, 2021	August Public-Input Meeting	If needed

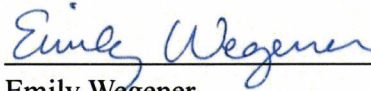
14. Sierra Club's recommendation for a seven-week extension to July 15, 2021, would not provide adequate time to work through modeling and incorporate the 2020 AS RFP final shortlist while allowing for meaningful stakeholder consideration and feedback. The Company needs adequate time to work as expediently as possible to develop the IRP, seek stakeholder feedback, and file the IRP with the regulatory commissions. The Company further notes that imposing additional modeling requirements would only result in more time constraints and could further delay development of the 2021 IRP.

### III. CONCLUSION

The Company's petition for an extension to the filing date of the 2021 IRP to on or before September 1, 2021, balances the need to expediently prepare and file the 2021 IRP with the opportunity for stakeholders to continue to provide robust and inclusive feedback. The Company appreciates Staff's recommendation that the extension be granted as requested. The Company also appreciates Sierra Club's recommendation that an extension be granted but as noted a seven-week extension, recommended by Sierra Club, would not be sufficient to develop and complete the 2021 IRP nor would it allow for meaningful stakeholder participation or feedback. Therefore, PacifiCorp respectfully requests that the Commission grant a filing date for the 2021 IRP of no later than September 1, 2021.

Dated this 24<sup>th</sup> day of March 2021.

Respectfully submitted by,  
ROCKY MOUNTAIN POWER

A handwritten signature in blue ink that reads "Emily Wegener". The signature is written in a cursive style and is positioned above a horizontal line.

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