

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF ROCKY MOUNTAIN ) CASE NO. PAC-E-21-03**  
**POWER’S 2021 INTEGRATED RESOURCE )**  
**PLAN )**  
**) ORDER NO. 34984**  
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On February 12, 2021, Rocky Mountain Power, a division of PacifiCorp (“Company”) petitioned the Commission to extend the filing date for its 2021 Integrated Resource Plan (“IRP”) from March 31, 2021, to no later than September 1, 2021. On February 25, 2021, the Commission issued a Notice of Petition for Extension and Notice of Modified Procedure. Order No. 34939.

Having reviewed the record, we approve the Company’s request.

**THE PETITION FOR EXTENSION**

The Company requested an extension so it could implement new modeling software and integrate the results of its 2020 All Source Request for Proposals (“2020AS RFP”) into its planning. The Company reported that as of the filings of its petition for extension, it had not successfully completed any model runs to develop resource portfolios and evaluate costs and risks. Petition at 3. The Company also stated its 2020AS RFP is on schedule to have a final shortlist by June 1, 2021. *Id.* at 2. Last, the Company stated it notified stakeholders at its February 10, 2021 public input meeting it expected to ask for an extension and would continue to provide opportunities for stakeholders to participate in the 2021 IRP development process until the extended filing date. *Id.* at 3.

**COMMENTS**

**a.) Commission Staff.**

Commission Staff recommended the Commission grant the Company’s requested five-month extension. Commission Staff Comments at 2. Staff also recommended that if the Company’s Load and Gas Forecast Update will be delayed past its October 15, 2021, filing deadline, or if the IRP will be further delayed, that the Company notify Staff as soon as possible. *Id.* Staff acknowledged that delaying the IRP filing will delay updates to the Company’s First

Capacity Deficit Date filing for avoided cost rates because that update occurs after the Commission acknowledges the IRP. *Id.* at 3.

**b.) Sierra Club.**

The Sierra Club stated a five-month delay would be unreasonable and requested the Commission direct the Company to file its IRP no later than July 15, 2021. Sierra Club Comments at 1. The Sierra Club stated that a July 15, 2021 filing deadline would still allow the Company to incorporate the final shortlist from its 2020AS RFP and complete the necessary model runs to develop a meaningful range of resource portfolios. *Id.* Sierra Club stated that the Company has had over a year to experiment with its modeling software, PLEXOS, and work with the provider to resolve any problems. *Id.* at 2. Sierra Club stated that regular IRP updates are critical to ensure the Company remains “nimble and responsive to market realities.” *Id.* Sierra Club stated that delaying the IRP will cause a cascade of other delays for many other proceedings, such as the IRP update the Company files in Oregon in years it does not file an IRP, the Company’s retirement plan for its coal facilities serving California customers, filings required by Washington’s Clean Energy Transformation Act, and the 2020 Multi-State Protocol. *Id.* at 2-3.

Sierra Club asked that if the Commission were to grant the Company’s requested delay, that the Commission require the Company to provide additional information to ensure sufficient information for informed decision making. *Id.* at 3. Sierra Club requested that the Commission direct the Company to make anonymized bid data from its 2020AS RFP publicly available. *Id.* at 4. Sierra Club also requested that the Commission direct the Company to use the 2020AS RFP results as inputs in its IRP modeling. *Id.* Sierra Club requested the Commission require the Company to model the costs of installing selective-catalytic reduction pollution control technology at its Hunter, Huntington, Wyodak, and Jim Bridger power plants, which Sierra Club stated is likely to be required under the Clean Air Act’s Regional Haze program. *Id.* Sierra Club requested the Commission require the Company to include carbon pricing in all its model runs and eliminate the no carbon price scenario. *Id.* at 5-6. Sierra Club requested that every model run that includes a carbon price lower than the social cost of carbon should report the carbon emissions and calculate the associated emissions costs based on the social cost of carbon value. *Id.* at 6. Sierra Club requested the social cost of carbon be determined by Executive Order 13990, issued on February 25, 2021. *Id.*

## COMMISSION DISCUSSION AND FINDINGS

The Company is an electrical corporation and public utility as defined in *Idaho Code* §§ 61-119 and -129, and the Commission has jurisdiction over it and the issues in this case under Title 61 of the Idaho Code, including *Idaho Code* § 61-501.

Having reviewed the record, we find it reasonable to extend the filing date for the Company's 2021 IRP. Doing so is intended to give the Company time to incorporate the results of its 2020AS RFP into its modeling process and provide the Company with the opportunity to develop resource portfolios. We understand there is a learning curve involved with using new modeling software to develop potential resource portfolios and we understand the value of ensuring the model inputs are current and accurate. However, extensive or numerous delays can also undercut the value of the planning process, disrupt the timing of other proceedings and updates, and cause the data underlying the IRP to become outdated. Resource planning is an ongoing process and resource decisions are not made in IRPs. In the interest of avoiding multiple delays, we find the five-month extension is reasonable, and grant it. We direct the Company to promptly notify Commission Staff if the Company becomes aware that it may need to further delay its IRP filing, or if it anticipates delays to its Load and Gas Forecast Update.


### ORDER

IT IS HEREBY ORDERED that the Company's filing date for its 2021 IRP is moved from the last business day of March until no later than September 1, 2021.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *See Idaho Code* § 61-626.

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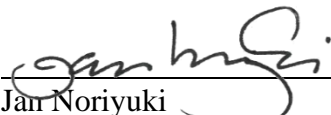
DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 31<sup>st</sup> day  
of March 2021.

  
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PAUL KJELLANDER, PRESIDENT

  
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KRISTINE RAPER, COMMISSIONER

  
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ERIC ANDERSON, COMMISSIONER

ATTEST:

  
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Jan Noriyuki  
Commission Secretary

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