# BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN	)	CASE NO. PAC-E-21-19
POWER'S FILING FOR	)	
ACKNOWLEDGEMENT OF ITS 2021	)	NOTICE OF FILING
INTEGRATED RESOURCE PLAN	)	
	)	NOTICE OF INTERVENTION
	)	DEADLINE
	)	
	)	ORDER NO. 35209
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On September 1, 2021, PacifiCorp dba Rocky Mountain Power ("Company") filed its 2021 Electric Integrated Resource Plan ("2021 IRP" or "IRP") pursuant to Commission Order No. 22299.<sup>1</sup>

The Commission now issues this notice of the Company's Filing and Notice of Intervention Deadline, setting a 21-day intervention deadline for persons or companies wishing to be joined as parties.

### NOTICE OF IRP FILING

YOU ARE HEREBY NOTIFIED that the Company's 2021 IRP represents its 16<sup>th</sup> comprehensive plan submitted to state regulatory commissions.<sup>2</sup>

YOU ARE FURTHER NOTIFIED that the Company's 2021 IRP was developed through comprehensive analysis and public input. Rocky Mountain 2021 IRP at 1. The 2021 IRP preferred portfolio includes accelerated coal retirements, no new fossil-fueled resources, continued growth in energy efficiency programs, the addition of energy storage resources, and a greater reduction in greenhouse gas emissions relative to the 2019 IRP. *Id*.

YOU ARE FURTHER NOTIFIED that the primary objective of the Company's 2021 IRP is to identify the best mix of resources to serve customers. *Id.* at 7. 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

NOTICE OF FILING

NOTICE OF INTERVENTION DEADLINE

ORDER NO. 35209

<sup>&</sup>lt;sup>1</sup> On September 15, 2021, the Company filed an updated IRP for the purpose of clarifying some changes in the IRP filed on September 1, 2021. *See updated IRP Vol. I* at 1. The updated IRP, as the Company assured, did not "affect the analysis or outcomes of the 2021 IRP." *Id.* 

<sup>&</sup>lt;sup>2</sup> In addition to the Idaho Public Utilities Commission, the Company has also filed its IRP with regulatory commissions in Oregon, Washington, Utah, Wyoming, and California.

customer demand for clean energy and ensuring compliance with state and federal regulatory objectives. *Id*.

YOU ARE FURTHER NOTIFIED that the Filing states, "the 2021 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 near-term and long-term resource decisions have on customer bills, reliability, and changes to greenhouse gas emissions from electricity generation. *Id.* In its 2021 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 while maintaining substantial investment in energy efficiency and demand response programs." *Id.* 

YOU ARE FURTHER NOTIFIED that the Company's 2021 IRP includes investments in clean transportation infrastructure, solar co-located with storage, nuclear, and expanded conservation measures. *Id.* at 5-6. It sets out a roadmap for a "clean, resilient, and affordable energy future that leverages . . . abundant, diverse, clean energy resources . . . through a modernized and expanded grid." *Id.* at 2.

YOU ARE FURTHER NOTIFIED that the Filing states its 2021 IRP preferred portfolio is supported by comprehensive data analysis and an extensive public input-process. *Id.* at 8. The Company's 2021 IRP preferred portfolio includes investments in renewables, facilitated by incremental transmission investments, demand-side management resources, storage resources, and advanced nuclear. *Id.* Before 2025, the preferred portfolio includes 1,792 Megawatts ("MW") of wind resources, 1,302 MW of solar additions, and 697 MW of battery storage capacity.<sup>3</sup> *Id.* 

YOU ARE FURTHER NOTIFIED that over the 20-year planning horizon, the IRP preferred portfolio includes 3,628 MW of new wind resources, and 5,628 MW of new solar resources co-located with storage. *Id.* 

YOU ARE FURTHER NOTIFIED that, to facilitate the delivery of energy to customers, the Company's 2021 IRP preferred portfolio also includes constructing a 416-mile transmission line—Gateway South—which will connect southeastern Wyoming with northern Utah. *Id.* at 31.

<sup>&</sup>lt;sup>3</sup> Of this total storage capacity, 497 MW will be paired with solar and 200 MW as a standalone battery.

YOU ARE FURTHER NOTIFIED that the Company's 2021 IRP Action Plan highlights the Company's planned actions over the next two to four years to deliver its preferred portfolio. *Id.* at 23-29, 321-327. Action items are based on the type and timing of resources in the preferred portfolio and include:

# 1. Existing Resource Actions

- Work with co-owners to seek the most cost-effective path forward toward exiting Colstrip Units 3 and 4 by December 31, 2025.
- Work with co-owners to seek the most cost-effective path forward toward exiting Craig Unit 1 by December 31, 2025.
- Begin retiring Naughton Units 1-2 by December 31, 2025, including all regulatory notices and filings.
- End coal-fueled operations at Bridger Units 1 and 2 and seek permitting for natural-gas conversion by 2024 including all regulatory notices and filings
- Complete carbon capture, utilization, and sequestration studies and submit for approval a plan for a proposed energy portfolio utilizing reliable, low-carbon electricity.
- Engage with various entities to achieve regional haze compliance outcomes.

## 2. New Resource Actions

- Work with Utah customers to develop a program to achieve goal of net 100 percent renewables by 2030.
- Pursue necessary regulatory approvals to authorize the acquisition and repowering of Rock River I and Foote Creek II-IV wind facilities.
- Continue to monitor key TerraPower milestones for development and make regulatory filings, including but not limited to, a request for the Oregon Public Utility Commission to explicitly acknowledge an alternative acquisition method, and a request for a waiver of a solicitation for a significant energy resource decision consistent with Utah statutory requirements. Complete regulatory steps and finalize agreements to begin training operators by 2025 for the Natrium<sup>TM</sup> Demonstration project.

- Issue an all-source request for proposals ("RFP") to procure resources that can achieve commercial operation by the end of December 2026. In October 2021, file a draft all-source RFP with the controlling state utility commissions. By Q2 2023, execute definitive agreements with winning bids from the all-source RFP. By Q4 2026 or earlier, all resources with winning bids are expected to achieve commercial operations.
- In 2021, the Company will continue with the RFP program.

# 3. Transmission Action Items

- Energy Gateway South Segment F (Aeolus-Clover 500 kV transmission line): By Q2 2022, the Company will obtain its final CPCN from Utah and Wyoming, complete construction and place in service by Q3 2024.
- Energy Gateway West, Segment D.1 (Windstar-Shirley Basin 230 kV transmission line): By Q2 2022, the Company will obtain conditional CPCN from Wyoming, complete construction and place in service by Q3 2024.
- Boardman to Hemingway 500 kV transmission line ("B2H"): The Company will continue supporting the project under the conditions of the B2H Joint Permit Funding Agreement.
- Initiate Local Reinforcement Projects as identified with the addition of new resources per the preferred portfolio, and follow-on requests for proposal successful bids.
- *Energy Gateway West*: Continue permitting for the Energy Gateway West transmission plan, segments D.3 and E.

### 4. Demand-Side Management ("DSM") Activities

- Acquire cost-effective Class 2 DSM—energy efficiency—resources by targeting annual system energy and capacity selections from the preferred portfolio.<sup>4</sup>
- Pursue cost-effective, Class 1—demand response—resources targeting annual system capacity selections from the preferred portfolio.

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<sup>&</sup>lt;sup>4</sup> In 2022, the Company estimates it will have 138 Megawatts ("MW") of Annual Incremental Capacity and 492 gigawatt-hours of Annual 1st Year Energy from Class 2 DSM activities.

## 5. Market Purchases

- Acquire short-term market purchases for on-peak delivery from 2021-2023.
- Balance month, day, and hour-ahead transactions through an intercontinental exchange with competitive pricing.

# 6. Renewable Portfolio Standards

- Pursue unbundled Renewable Energy Credit ("REC") RFPs to meet state Renewable Portfolio Standard ("RPS") requirements where applicable.
- Issue RFPs seeking then current-year or forward-year vintage unbundled RECs that will qualify to meet California's RPS through 2024.
- Maximize the sale of RECs that are not required to meet state RPS compliance obligations.

YOU ARE FURTHER NOTIFIED that the Application is available for public inspection during regular business hours at the Commission's office. These documents are also available on the Commission's web site at <a href="www.puc.idaho.gov">www.puc.idaho.gov</a>. Click on the "ELECTRIC" icon, select "Open Cases," and click on the case number as shown on the front of this document.

YOU ARE FURTHER NOTIFIED that all proceedings in this case will be held pursuant to the Commission's jurisdiction under Title 61 of the Idaho Code.

YOU ARE FURTHER NOTIFIED that all proceedings in this matter will be conducted pursuant to the Commission's Rules of Procedure, IDAPA 31.01.01.000 *et seq*.

#### NOTICE OF INTERVENTION DEADLINE

YOU ARE FURTHER NOTIFIED that persons who wish to intervene in this matter to obtain the rights of party (e.g., to file formal discovery, or present evidence, or cross-examine witnesses at a hearing) must file a Petition to Intervene with the Commission under the Commission's Rules of Procedure 72 and 73, IDAPA 31.01.01.072 and .073. **Persons who wish to intervene as a party must file a Petition to Intervene no later than 21-days from the service date of this Order**. Such persons shall also provide the Commission Secretary with their email address to facilitate further communications. After the intervention deadline runs, the Commission Secretary shall issue a Notice of Parties that identifies the parties and assigns exhibit numbers to

each party. Once the Notice of Parties has issued, Commission Staff shall informally confer with the Company and any intervening parties about how to further process this case, and shall then report back to the Commission on a proposed case schedule.

YOU ARE FURTHER NOTIFIED that persons who would like to present their views without parties' rights of participation and cross-examination do not have to intervene but may present their views by submitting written comments to the Commission.

YOU ARE FURTHER NOTIFIED that the following people are designated as the Company's representatives in this matter:

Ted Weston Data Request Response Center

Rocky Mountain Power PacifiCorp

1407 West North Temple, Suite 330 825 NE Multnomah, Suite 2000

Salt Lake City, Utah 84116 Portland, OR 97232

ted.weston@pacificorp.com datarequest@pacificorp.com

emily.wegener@pacificorp.com irp@pacificorp.com

#### **ORDER**

IT IS HEREBY ORDERED that persons desiring to intervene in this matter must file a Petition to Intervene no later than **21-days from the service date of this Order**. Once the deadline has passed, the Commission Secretary shall prepare and issue a Notice of Parties.

IT IS FURTHER ORDERED that, after the Notice of Parties has issued, Commission Staff shall confer with the parties regarding a procedural schedule for this matter.

IT IS FURTHER ORDERED that parties should continue to comply with Order No. 35058, issued June 3, 2021. All pleadings should be filed with the Commission electronically and shall be deemed timely filed when received by the Commission Secretary. See Rule 14.02. Service between parties should also be accomplished electronically. Voluminous discovery-related documents may be filed and served on CD-ROM or a USB flash drive.

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DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 28<sup>th</sup> day of October 2021.

PAUL KJELLANDER, PRESIDENT

KRISTINE RAPER, COMMISSIONER

ERIC ANDERSON, COMMISSIONER

ATTEST:

Jan Noriyuki
Commission Secretary

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