

DECISION MEMORANDUM

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

FROM: RILEY NEWTON
DEPUTY ATTORNEY GENERAL

DATE: OCTOBER 6, 2021

SUBJECT: IN THE MATTER OF ROCKY MOUNTAIN POWER'S FILING FOR
ACKNOWLEDGEMENT OF ITS 2021 INTEGRATED RESOURCE PLAN;
CASE NO. PAC-E-21-19.

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.

ROCKY MOUNTAIN'S 2021 IRP

The Company's 2021 IRP was developed through comprehensive analysis and with extensive 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, and a greater reduction in greenhouse gas emissions relative to the 2019 IRP. *Id.*

The primary objective of the Company's 2021 IRP is to identify the best mix of resources that will continue 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 risks, while considering customer demand for clean energy and ensuring compliance with state and federal regulatory objectives. *Id.*

The Company's 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, 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 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.*

The Company’s 2021 IRP includes investments in clean transportation infrastructure, battery storage and solar projects, 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.

The Company’s 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.* By the end of 2024, the preferred portfolio includes 1,792 Megawatts (“MW”) of wind resources, 1,302 MW of solar additions, and 697 MW of battery storage capacity.¹ *Id.*

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.*

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.

STAFF RECOMMENDATION

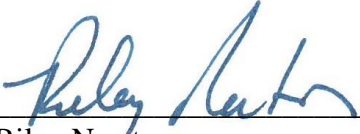
Staff recommends that the Commission issue a Notice of Filing and set a 21 day intervention deadline. Once the intervention deadline has passed, Staff will informally confer with the intervening parties about further scheduling and will report their findings back to the Commission.

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¹ Of this total storage capacity, 497 MW will be paired with solar and a 200 MW as a standalone battery.

COMMISSION DECISION

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



Riley Newton
Deputy Attorney General

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