

## BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF PACIFICORP'S	)	CASE NO. PAC-E-25-12
APPLICATION FOR	)	
ACKNOWLEDGEMENT OF THE 2025	)	
INTEGRATED RESOURCE PLAN	)	ORDER NO. 36868
	)	

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On December 31, 2024, Rocky Mountain Power, a division of PacifiCorp (“Company”), filed a draft version of its 2025 Integrated Resource Plan (“IRP”) with the Idaho Public Utilities Commission (“Commission”) in Case No. PAC-E-24-13. The Company indicated that it would file the final version of the 2025 IRP on March 31, 2025. The Company requested that the Commission postpone issuing a public notice and setting a schedule until the final version was filed. On March 31, 2025, the Company applied to the Commission requesting acknowledgment of the final version of its 2025 IRP. On May 22, 2025, the Commission closed Case No. PAC-E-24-13 and opened this docket to consider the Company’s request for acknowledgment of its 2025 IRP (“Application”). Order No. 36605.

On June 3, 2025, the Commission issued notice of the Company’s Application and set a deadline for interested persons to petition to intervene in the case. Order No. 36620. No third parties sought to intervene. On July 22, 2025, the Commission issued notice that the Application would be processed under modified procedure and established comment deadlines. Order No. 36683. Commission Staff (“Staff”) filed comments to which the Company replied. The Commission received no public comments.

Based on our review of the record, the Commission now issues this Final Order acknowledging the Company’s 2025 IRP.

### THE 2025 IRP

The Company represented that it submitted the 2025 IRP filing in compliance with Order No. 22299, Case No. U-1500-165, dated January 1989; whereby the Commission ordered biennial filings of the electric IRP. 2025 IRP Vol. 2 at 22. The Company stated that its plan was also submitted to the Commission as the Resource Management Report on the Company’s resource planning status. *Id.*

The IRP consisted of approximately 317 pages, accompanied by approximately 536 pages of appendices. The IRP was organized into 10 chapters with numerous subsections: (1) Executive Summary; (2) Introduction; (3) Planning Environment; (4) Transmission; (5) Reliability and Resiliency; (6) Load and Resource Balance; (7) Resource Options; (8) Modeling and Portfolio Evaluation; (9) Modeling and Portfolio Selection Results; and (10) Action Plan. *Id.* at i–vii.

According to the Company, the 2025 IRP fulfills the Company’s commitment to develop a long-term resource plan that considers cost, risk, uncertainty, and the long-run public interest. 2025 IRP Vol. 1 at 19. The Company reported that regulatory staff, advocacy groups, and other interested parties influenced the development of the 2025 IRP through a collaborative public input process. *Id.*

The Company represented that the 2025 IRP enhances jurisdictional portfolio development and reporting in recognition of the increased focus on individual state jurisdictional outcomes in recent integrated resource planning cycles. 2025 IRP Vol. 1 at 19. The Company also stated that the 2025 IRP describes the fundamental methodologies used to arrive at state-level initial portfolios and how they are subsequently integrated into a single plan. *Id.*

The Company stated that its selection of the 2025 IRP preferred portfolio is supported by comprehensive data analysis and an extensive public input process. *Id.* The Company also represented that the 2025 IRP includes substantial new renewables, facilitated by incremental transmission investments, demand-side management resources, significant storage resources, and advanced nuclear. *Id.*

According to the Company, the 2025 IRP preferred portfolio is in addition to contracted resources. *Id.* The Company also represented that the 100 megawatt (“MW”) Hornshadow I Solar and 200 MW Hornshadow Solar II facilities are set to come online in 2025, while two facilities combining solar and storage are set to come online in 2025 and 2026: Faraday with 525 MW solar and 150 MW storage and Green River with 400 MW solar and 400 MW storage. *Id.* The Company further represented that Oregon’s Community Solar Program has 10 small-scale solar facilities scheduled to come online in 2025 and 2026, totaling approximately 18 MW. *Id.*

The Company represented that the 2025 IRP preferred portfolio includes the 500 MW advanced nuclear Natrium demonstration project, anticipated to achieve online status by summer 2030. *Id.* Additionally, the Company stated that over the 21-year planning horizon, the 2025 IRP preferred portfolio includes 6,379 MW of new wind and 5,492 MW of new solar, and 7,668 MW

of new storage resources. *Id.* The Company stated that the new storage includes five battery facilities totaling 520 MW projected to come online ahead of the peak summer season in 2026: Dominguez BESS (200 MW), Enterprise BESS (80 MW), Escalante BESS (80 MW), Granite Mountain BESS (80 MW) and Iron Springs BESS (80 MW). *Id.* at 19–20. The Company also reported that the 2025 IRP preferred portfolio provides details of various additional transmission projects, including the transfer capability and estimated cost of each project. *Id.* at 6, 20, 79–97.

### STAFF COMMENTS

Based on Staff’s review of the Company’s 2025 IRP and Staff’s participation in the series of 2025 IRP public input meetings, Staff believed that the 2025 IRP addresses the requirements outlined in Commission Order No. 22299. Staff Comments at 2. Staff recommended that the Commission acknowledge the 2025 IRP. *Id.* However, Staff also had numerous recommendations for improvements for future IRPs.

Staff recommended the Company justify the selection of the preferred portfolio, considering the superior performance of other portfolios in some modeling results. Staff believed there were three portfolios that might have outperformed the Company’s preferred portfolio across the range of modeled price policy scenarios and that the preferred portfolio was the top performing portfolio in only one scenario. *Id.* at 7. Staff believed the Company should provide further explanation as to why it selected the preferred portfolio, while specifically addressing these concerns. *Id.*

Staff also noted that the Company only applied end effects to one price policy scenario and recommended the Company conduct additional tests applying end effects or similar conditions under each price policy scenario for all competing portfolios in the future IRPs. *Id.* According to Staff, such measures would make each of the competing portfolios “comparable on a relative basis.” *Id.*

Additionally, Staff recommended the Company review its practices for hedging natural gas fuel supply to mitigate fuel supply risks and dependence on natural gas for dispatchable generation. *Id.* at 9. Staff believed these steps would help ease concerns of customer exposure to natural gas price volatility as the Company continues to move away from coal. *Id.*

Prior to the Company’s next IRP, Staff recommended the Company collaborate with Staff concerning multiple planning issues. Firstly, Staff would like to work with the Company to explore the possibility of developing an Idaho-specific portfolio, as it does for other states. *Id.* at 17.

Additionally, Staff would like to work with the Company to find a balance between meeting the Western Resource Adequacy Program (“WRAP”) resource adequacy compliance requirements and avoiding overbuilding resources. *Id.* at 15.

Staff had concerns about the Company’s transmission resources related to large load customers. *Id.* at 12. To alleviate these concerns, Staff recommended that before the next IRP, the Company provide the Commission with: (1) the Company’s re-evaluation study concerning the Boardman-to-Hemingway (“B2H”) transmission line; and (2) information regarding removal of new large customer loads, customer plans to serve their own loads, and the impact on the Company’s system and on its Idaho customers. *Id.* at 12.

According to Staff, the Company evaluated assumptions for supply-side resources under the policies of the previous presidential administration. *Id.* at 13. However, Staff was concerned that recent changes in federal policy may have invalidated some of the results of the 2025 IRP regarding advanced technology, environmental factors, and costs. *Id.* Staff recommended the Company provide an analysis demonstrating how its resources would change because of some of the most recent federal policies. *Id.*

Finally, Staff believed the Company’s preferred portfolio selection analysis should include an additional verification step of a “feedback loop” to confirm that the selected preferred portfolio meets the defined loss of load expectation target. *Id.* at 16. Staff stated that this step would provide greater clarity in future IRPs as to whether the defined reliability target is achieved by the developed integrated preferred portfolios. *Id.*

#### **COMPANY REPLY COMMENTS**

The Company was amenable to the majority of Staff’s recommendations, agreeing to: (1) apply end effects to all price-policy scenarios; (2) meet with Staff to discuss balancing the costs and risks of building new resources and relying on front office transactions; (3) provide greater clarity in future IRPs as to whether the defined reliability target is achieved by the developed integrated preferred portfolios; (4) review its hedging practices to mitigate exposure; (5) provide an incremental analysis accounting for recent changes in federal tax credit policy; (6) provide an evaluation of the impacts of large loads; (7) provide updates and further modeling regarding the B2H transmission line project; (8) provide the Commission with annual or semi-annual reports regarding the status of the Natrium Nuclear demonstration project; and (9) meet with Staff prior to its next IRP to discuss developing an Idaho-specific portfolio. Company Reply Comments at 6–

13. The Company stated it would address these issues either in future IRPs or in the 2025 IRP Update, which it plans to distribute on March 31, 2026. *Id.* at 6, 11.

The Company also responded to Staff's recommendation that it justify the selection of the preferred portfolio despite other portfolios performing better in certain price-policy scenarios. *Id.* at 5. According to the Company, the preferred portfolio was selected because of its performance in the expected price-policy scenario and not its performance in other, less likely price-policy scenarios. *Id.* The Company added that a stochastic analysis and end effects were completed only for the expected price-policy scenario, rendering more robust results than modeling for other price-policy scenarios. *Id.*

### **COMMISSION FINDINGS AND DECISION**

The Company is a 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, the Commission finds that the Company's 2025 IRP satisfies the requirements in the Commission's prior orders, and the Commission acknowledges the 2025 IRP. We appreciate the Company's commitment, as expressed in its Reply Comments, to work collaboratively with Staff to improve the IRP planning process. We anticipate the Company's next IRP will incorporate much of Staff's feedback from this case.

In acknowledging the 2025 IRP, the Commission once again reiterates that an IRP is a working document that incorporates many assumptions and projections at a specific point in time. An IRP is a plan, not a blueprint, and by issuing this Order we merely acknowledge the Company's ongoing planning process, not the conclusions or results reached through that process.

The Commission does not approve the 2025 IRP, or any resource acquisitions referenced in it, endorse any particular element in it, opine on the Company's prudence in selecting the 2025 IRP's preferred resource portfolio, nor allow or approve any form of cost recovery. The appropriate place to determine the prudence of the Company's decisions to follow or not follow the 2025 IRP, and the validation of predicted performance under the 2025 IRP, is a general rate case or other proceeding where the issue is noticed.

### **ORDER**

IT IS HEREBY ORDERED that the Company's 2025 IRP is acknowledged.

THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date upon this Order regarding 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.*


DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this 17<sup>th</sup> day of December 2025.

  
EDWARD LODGE, PRESIDENT

  
JOHN R. HAMMOND JR., COMMISSIONER

  
DAYN HARDIE, COMMISSIONER

ATTEST:

  
Laura Calderon Robles  
Interim Commission Secretary

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