

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

LC 70

In the Matter of )  
 )  
PACIFICORP 2019 INTEGRATED ) COMMENTS OF SMALL  
RESOURCE PLAN ) BUSINESS UTILITY ADVOCATES  
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Small Business Utility Advocates appreciates the deliberative and comprehensive process which PacifiCorp (“Company”) and the other parties have followed to review this 2019 PacifiCorp Integrated Resource Plan. SBUA does not take a position on acknowledgement of the IRP or specific components except as expressed in these comments.

SBUA supports other parties’ position that the Company take a deeper dive into examining opportunities for non-transmission alternatives including demand response, energy efficiency, among others, to meet load and providing more information about these in the IRP.

SBUA supports parties’ request for much more focus on demand response, but also agrees with CUB’s concern that acquiring “all cost effective demand response” would be applied unfairly. SBUA supports adding “and reasonable” to the Staff’s recommendation and supports examining demand response more closely with regard to small general service customers.

The world has changed a lot, recently, and very quickly, for many and possibly most small businesses and small nonresidential customers. While still in the midst of impacts by COVID-19, SBUA supports Staff’s and Sierra Club’s comments regarding reviewing COVID impacts to the procurement process and load forecast, and any potential adjustments in response.

RESPECTFULLY SUBMITTED May 6, 2020

s/ Diane Henkels

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