

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

LC 70

In the Matter of

PACIFICORP dba PACIFIC POWER,

2019 Integrated Resource Plan.

---

Renewable Northwest's  
Comments on Staff Report

**April 29, 2020**

**COMMENTS**

Renewable Northwest is grateful to the Oregon Public Utility Commission (“the Commission” or “PUC”) for the opportunity to submit these comments on Staff’s April 17, 2020 Report to the Commission regarding PacifiCorp’s 2019 Integrated Resource Plan (“IRP”).

Renewable Northwest filed comments in this docket on January 10, 2020 and March 4, 2020 setting forth our substantive positions on PacifiCorp’s IRP. At a high level, we appreciate the thoughtful analysis and robust stakeholder engagement that PacifiCorp engaged in to identify and facilitate accelerated retirement of uneconomic coal units and procurement of new resources, with a preference for renewables and other resources that can help to integrate new renewables. PacifiCorp has made a compelling case that accelerating coal retirements and adding renewable resources will result in savings for customers, maintain system reliability, and reduce greenhouse gas emissions -- a result that is increasingly necessary as globally and regionally emission reductions are failing to keep pace with the advance of climate change. We appreciate this IRP as a significant step in the transformation of PacifiCorp’s system, and we look forward to additional analysis and engagement in future IRP cycles not only to continue but also to accelerate that transformation.

Additionally, Renewable Northwest appreciates the thoughtful analysis presented in Staff’s April 17 Report. We have no significant concerns with the Report. We specifically support Staff’s efforts in this docket and Docket No. UM 2059 (regarding PacifiCorp’s proposed RFP) to ensure that regulatory timelines regarding each process support robust analysis by Staff and stakeholders while also aligning with both PacifiCorp’s interconnection queue reform efforts and the sunset dates for the federal Investment Tax Credit and Production Tax Credit -- policies that are potential drivers of significant near-term customer savings and system decarbonization.

Against this backdrop, we rest on our previously submitted comments and reiterate our appreciation for PacifiCorp, stakeholders, Staff, and the Commission in this important process.

Respectfully submitted this 29th day of April, 2020,

/s/ Max Greene

Max Greene

Regulatory and Policy Director

Renewable Northwest

421 SW Sixth Ave., Suite 975

Portland, OR 97204

(503) 223-4544