

April 2, 2020

VIA ELECTRONIC FILING

Public Utility Commission of Oregon
201 High Street SE, Suite 100
Salem, OR 97301-3398


Attn: Filing Center

RE: LC 70—PacifiCorp's Final Comments

PacifiCorp d/b/a Pacific Power encloses for filing a corrected version of page 28 from its Final Comments in the above-referenced docket. PacifiCorp filed its Final Comments on April 1, 2020; subsequently the company identified an error on page 28 of the Final Comments. The enclosed, corrected page deletes the phrase “[t]his is in addition to the FOTs already accounted for in the IRP modeling;” that was inadvertently included in the April 1, 2020 version of the Final Comments. No other changes have been made and only page 28 has been revised.

Informal inquiries may be directed to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,



Michael Wilding
Director, Regulation

Enclosures

obligation in 2024 by over 950 MW.⁵⁰ The 2019 IRP includes 1,425 MW of market capacity. The amount of “firm” capacity from new generating resources being contemplated in the RFP, based on preferred portfolio resource selections, totals just over 730 MW. Thus, the company is not procuring resources ahead of a capacity deficit and it cannot be argued that the 2020AS RFP is not the result of a capacity need identified in the 2019 IRP.⁵¹ The 2020AS RFP will procure resources to reduce PacifiCorp’s capacity deficit during the Action Plan timeframe.⁵² If the company does not acquire additional resources through the 2020AS RFP it risks meeting its reliability obligations.

2. Treatment of Long-lead Time Resources in the 2020AS RFP.

In its Reply Comments, PacifiCorp stated that it would consider bids that include long-lead time resources in response to the 2020AS RFP.⁵³ The company stated that if a determination was made that such a resource was feasible and could provide economic benefits, the resource bid would be removed from the 2020AS RFP and pursued subject to a waiver request under the Commission’s competitive bidding rules.⁵⁴ In response to this proposal, Staff recommends that the company conduct a separate RFP for up to 200 MW of flexible capacity scheduled to come online after 2024 but before 2027.⁵⁵ Staff makes this recommendation

⁵⁰ See 2019 IRP Volume I, Chapter 5 (Load and Resource Balance), page 115, Table 5.12 – Summer Peak – System Capacity Loads and Resources without Resource Additions and line System Position.

⁵¹ See, generally, AWEC Final Comments.

⁵² Because PacifiCorp has identified a capacity need in the 2019 IRP sufficient to justify its 2020AS RFP there is no need to address the remainder of AWEC’s Final Comments.

⁵³ PacifiCorp Reply Comments at 28.

⁵⁴ PacifiCorp Reply Comments at 29.

⁵⁵ Staff Final Comments at 10.