

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**LC 70**

In the Matter of  
PACIFICORP, dba PACIFIC POWER  
2019 Integrated Resource Plan.

THE RENEWABLE ENERGY  
COALITION’S FINAL COMMENTS

The Renewable Energy Coalition (the “Coalition”) respectfully submits these Final Comments for consideration by the Oregon Public Utility Commission (the “Commission” or “OPUC”) in the matter of PacifiCorp’s 2019 Integrated Resource Plan (“IRP”). The Coalition continues to support its position articulated in its Opening Comments filed in this matter on January 10, 2020. The Commission should acknowledge the value qualifying facilities (“QFs”) provide to PacifiCorp’s system and affirmatively direct PacifiCorp to assume in its IRP that all or a reasonable number of existing QFs will renew their contracts, and that these renewing QFs provide value to the Company and ratepayers.

The Coalition also supports Staff’s position that it is not reasonable for PacifiCorp to project that it will enter into zero new QF contracts over the planning horizon and that uncertainty about the number of new QF contracts is no reason to not attempt a reasonable projection.<sup>1</sup> While the Commission’s new docket UM 2038 will investigate the appropriate treatment of QFs in long term planning, PacifiCorp is long overdue in its obligation to appropriately plan for QFs in its IRP.<sup>2</sup> PacifiCorp’s IRP historically

---

<sup>1</sup> Staff Opening Comments at 13.

<sup>2</sup> See The Coalition’s Opening Comments at 3-5.

accurately planned that QFs would renew their contracts, but PacifiCorp made a change in its 2017 IRP. The Commission has never blessed or otherwise addressed this change. In this IRP, PacifiCorp continues to inaccurately assume that zero QFs will enter into a new contract with PacifiCorp at the end of their current contract. All relevant data, common sense, and sound regulatory policy support PacifiCorp acting now, in this IRP, and use a reasonable forecast. The fact that UM 2038 may address similar issues with a final order potentially years away should not prevent the Commission from requiring that PacifiCorp comply with IRP guidelines that require it to account for uncertainty, now.

Dated this 4th day of March 2020.

Respectfully submitted,

Sanger Law, PC



Irion A. Sanger  
Marie P. Barlow  
Sanger Law, PC  
1041 SE 58th Place  
Portland, OR 97215  
Telephone: 503-756-7533  
Fax: 503-334-2235  
irion@sanger-law.com

Of Attorneys for Renewable Energy Coalition