BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

LC 70

In the Matter of PACIFICORP, dba PACIFIC POWER, 2019 Integrated Resource Plan.	OPENING COMMENTS OF SWAN LAKE NORTH HYDRO, LLC

I. INTRODUCTION

Swan Lake North Hydro, LLC ("Swan Lake") hereby submits opening comments to the Oregon Public Utility Commission (the "Commission") addressing the 2019 Integrated Resource Plan ("IRP") filed by PacifiCorp, dba Pacific Power ("PacifiCorp") on October 18, 2019, including the October 25, 2019 Errata. In a ruling issued to this Docket on December 13, 2019, Administrative Law Judge Rowe suggested that stakeholders may want to address the following issues:

1. Do PacifiCorp's IRP filings contain design, scoring methodology, and associated modeling process as described in OAR 860-089-0250(2)(a)?
2. Does PacifiCorp plan to address specific RFP design items in its IE selection docket?
3. Do stakeholders seek specific RFP design items in the IE selection docket?
4. Does PacifiCorp's RFP design information allow for long-lead time resources?

With respect to the fourth question, Swan Lake urges PacifiCorp to consider resource procurement outside of its proposed 2020 – 2023 action plan window to ensure non-emitting, but long-lead time capacity resources, like pumped hydro storage, can be available to meet a portion of PacifiCorp's clearly identified need for flexible resources to maintain long-term system reliability.

II. BACKGROUND

In its 2019 IRP, PacifiCorp has undertaken a comprehensive analysis of its future resource needs while simultaneously re-evaluating the cost-effectiveness of its existing coal-fired generation fleet. The resulting preferred portfolio, after accounting for over 2,700 MW of incremental energy efficiency, calls for the addition of almost 11,000 MW of wind and solar resources during the twenty years ending in 2038. The preferred portfolio also includes almost 1,000 MW of new natural gas peaking capacity through 2038, with the first addition in 2026. Over this same time period, PacifiCorp has identified nearly 4,500 MW of coal unit retirements.

To maintain the reliability of the grid as it increases its reliance on variable energy resources, PacifiCorp's preferred portfolio includes just over 2,800 MW of storage capacity. More than half of this total is assumed by PacifiCorp to be batteries co-located with solar photovoltaic projects selected by its System Optimizer model, with the remainder being stand-alone batteries added to meet reliability needs identified by its Planning and Risk (PaR) model. Additional capacity to meet PacifiCorp's remaining resource needs is provided through front-office transactions (FOTs) assumed to supply up to 1,375 MW during the summer period. Annual additions through 2030 and totals through 2038 are summarized below in Table 1.

Table 1. Summary of Storage and Gas Turbine Capacity Additio[1]

	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031 - 2038	Grand Total
PAC-East												
Storage												
Paired with Solar	40	16	1	226	0	0	0	0	0	0	352	635
Stand-alone	0	0	0	0	0	0	0	0	0	0	390	390
Total	40	16	1	226	0	0	0	0	0	0	742	1,025
Gas Turbine	0	0	0	0	0	185	0	0	0	370	0	555
Cumulative Total	40	56	57	283	283	468	468	468	468	838	1,580	1,580
FOT - Summer	0	0	0	0	0	0	0	88	300	199	272	
Total Capacity + FOT	40	56	57	283	283	468	468	556	768	1,037	1,852	
PAC-West												

[1] PacifiCorp – 2019 IRP, Table K.15.