



THE BUREAU OF
**PLANNING &
SUSTAINABILITY**



October 9, 2025

Oregon Public Utility Commission
201 High St. SE, Suite 100
Salem, Oregon 97301-3398

Re: LC 85 – PACIFICORP 2025 INTEGRATED RESOURCE PLAN (IRP)

Dear Chair Tawney and Commissioners Perkins and Power,

The City of Portland Bureau of Planning & Sustainability and the Multnomah County Office of Sustainability appreciate the opportunity to comment on PacifiCorp's 2025 Integrated Resource Plan (IRP) and Clean Energy Plan (CEP). Our elected leaders have adopted local climate and clean energy goals, and the communities we represent have a vested interest in realizing the emissions reductions mandated under House Bill 2021. PacifiCorp's 2025 IRP and CEP amplify the concerns that our local governments expressed in response to the 2023 IRP Update^{1,2}. With the next House Bill 2021 compliance target just over five years away, the risk of non-compliance warrants more assertive direction by the Oregon Public Utility Commission, beyond non-acknowledgement of the IRP and CEP.

PacifiCorp's IRP takes an unprecedented technical approach to resource planning and modeling. According to PacifiCorp³, "in the past, all portfolio decisions have been considered at a system-wide level to arrive at the best results for all customers, where customers share in the costs and benefits from system-wide planning." The 2025 IRP deviates significantly from that vetted approach by fragmenting the six-state utility

¹ City of Portland comments RE: LC82 PAC 2023 IRP Update, <https://edocs.puc.state.or.us/efdocs/HAC/lc82hac329379025.pdf>

² Multnomah County Office of Sustainability comments RE: LC82 PAC 2023 IRP Update, <https://edocs.puc.state.or.us/efdocs/HAC/lc82hac329354025.pdf>

³ PacifiCorp 2025 Clean Energy Plan at pg. 59, <https://edocs.puc.state.or.us/efdocs/HAQ/lc85haq337820115.pdf>



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service territory into jurisdictions only to reintegrate the portfolio using a new methodology⁴. In addition, PacifiCorp's decision to omit the Boardman to Hemmingway transmission line raises the concern, voiced by many stakeholders in the first round of comments, about isolating PAC-West territory and limiting access to resources in PAC-East territory. Concerns about the foundational inputs to the IRP model erode confidence in the resulting Preferred Portfolio. We support the OPUC staff analysis that "the model provides insights that do not effectively characterize least-cost, least risk resource needs."⁵ As local governments, we rely on the expertise of OPUC staff and other organizations to provide further in-depth review of the resource planning methodology, and would support a Commission decision to require PacifiCorp to conduct a full-system optimization model akin to IRP modeling from years past.

It is not apparent that PacifiCorp's IRP and CEP demonstrate continual progress toward emissions reduction in a manner that balances cost and risk, while producing community benefits. The 2025 IRP/CEP rely heavily on procuring utility-scale wind, solar, and storage "just-in-time" for 2030 and "PacifiCorp recognizes there are risks associated with this strategy."⁶ Based on Table 25 in the CEP⁷, PacifiCorp looks to add only 707 MW of capacity from 2025-2029, before adding 3,174 MW of capacity in 2030. The "just-in-time" approach adds unnecessary delay to resource procurement and is counter to the principle of continual progress. It is critical that PacifiCorp be more assertive on emissions-free resource procurement, particularly to take advantage of expiring federal tax credits.

PacifiCorp's Clean Energy Plan does not seek to maximize community benefits or Community Based Renewable Energy (CBRE) resources and instead casts doubt on the costs and utility system benefits of CBREs. PacifiCorp's CBRE Potential Study "does not identify a supply curve" of actionable resources and PacifiCorp's "approach continues to be the provision of support to communities in consideration of, or actively developing CBRE projects"⁸. Of the 95MW of potential CBRE capacity, an overwhelming majority will come from existing programs, like the Oregon Community Solar Program, Energy Trust of Oregon, or the ODOE Community Renewable Energy Grants. Only 3.4 MW is expected to come from Pacific Power initiated activities, like the Resilience Hub pilot. While this is consistent with PacifiCorp's 2023 CEP, these activities and provisional support do not deliver on the policy set forth in HB 2021 that electricity is generated "to the maximum extent practicable, in a manner that provides additional direct benefits to communities."⁹

In summary, PacifiCorp's IRP/CEP does not present least-cost, least risk resource planning, does not demonstrate continual progress towards emissions reductions, and does not maximize community benefits. Bureau of Planning & Sustainability and Multnomah County Office of Sustainability ask the Commission to use its authority to compel PacifiCorp to take prudent actions over the next five years to comply with Oregon law.

⁴ PacifiCorp 2025 Integrated Resource Plan at pg. 218, <https://edocs.puc.state.or.us/efdocs/HAA/haa335779026.pdf>

⁵ RE: LC 85 OPUC Staff Opening Comments at pg. 4, <https://edocs.puc.state.or.us/efdocs/HAC/lc85hac338616027.pdf>

⁶ PacifiCorp 2025 Clean Energy Plan at pg. 8

⁷ PacifiCorp 2025 Clean Energy Plan at pg. 74

⁸ PacifiCorp 2025 Clean Energy Plan at pg. 47

⁹ Oregon House Bill 2021 at pg. 2, <https://olis.oregonlegislature.gov/liz/2021R1/Downloads/MeasureDocument/HB2021/Enrolled>



Respectfully submitted this 9th day of October 2025,

/s/

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/s/

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