

March 13, 2023

VIA ELECTRONIC FILING

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

RE: UM 2143—PacifiCorp’s Comments on Staff’s Straw Proposal Update

PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) provides these comments in response to the February 17, 2023 straw proposal update on resource adequacy (Report) provided by the Staff of the Public Utility Commission of Oregon (Commission Staff). The Company values the significant effort and analysis that has characterized Commission Staff’s approach to Resource Adequacy (RA) in this docket so far and the collaborative engagement with stakeholders that resulted in the latest straw proposal.

PacifiCorp appreciates the outreach that was conducted by Staff as a precursor to the development of this latest straw proposal. Additionally, PacifiCorp supports the straw proposal that Staff has put forth in this proceeding. This latest straw proposal appropriately balances the needs addressing resource adequacy first at a regional level, and then providing for an Oregon specific lens to address any seams issues for the benefit of Oregon customers.

PacifiCorp does still seek clarification around Staff’s proposed inclusion of a resource adequacy analysis in the Integrated Resource Plan (IRP) process. Specifically, additional guidance on how the Resource Adequacy analysis needs to be incorporated into the IRP would be helpful. The IRP is intended to address the long-term resource needs of an investor-owned utility (IOU), while resource adequacy is intended to address a nearer term capacity shortfall. PacifiCorp recommends that this issue be resolved by providing Commission Staff the Western Resource Adequacy Program (WRAP) advisory forecast which would provide that look over a multi-year period. By reviewing this document in conjunction with the IRP, Staff will be able to see a complete picture of how PacifiCorp is planning to meet its resource needs over a five-year period.

PacifiCorp additionally recommends that this advisory forecast be provided to Commission Staff outside the IRP process, because this document contains extremely competitively sensitive information which would be very harmful to the Company and customers if shared in a broader stakeholder process like the IRP. Finally, PacifiCorp recommends that any resource adequacy requirements for the IRP should not extend to the IRP update. This ensures that IOUs have parity with the requirements on Electric Service Suppliers (ESSs), who (under the straw proposal) are only required to file a resource plan every four years.

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PacifiCorp appreciates the opportunity to provide these comments and looks forward to continuing to actively participate in this investigation.

Sincerely,

A handwritten signature in black ink, appearing to read 'Matthew McVee', with a stylized flourish at the end.

Matthew McVee

Vice President, Regulatory Policy and Operations