

September 30, 2024

VIA ELECTRONIC MAIL

Public Utility Commission of Oregon
Attention: Filing Center
201 High St. SE, Suite 100
Salem, Oregon 97301-3398

**Re: LC 62 and LC 67 – PacifiCorp’s Written Report on DSM IRP Acquisition Goals,
Environmental Compliance and Transmission Investments – 2024 First Update**

PacifiCorp d/b/a Pacific Power provides the attached report in compliance with the following provision included in Order No. 14-252, as modified in Order No. 14-288, streamlined in Order No. 16-071, and clarified by the Public Utility Commission of Oregon (Commission) at the December 20, 2016 Public Meeting:

Beginning in the fourth quarter of 2014, PacifiCorp will appear before the Commission to provide quarterly updates on coal plant compliance requirements, legal proceedings, pollution control investments, and other major capital expenditures on its coal plants or transmission projects. PacifiCorp may provide a written report and need not appear if there are no significant changes between the quarterly updates.¹

We highlight the reporting requirement that the company continue to provide twice yearly updates on the status of DSM IRP acquisition goals at regular public meetings. Include in these updates information on future plant and transmission investment decisions, as a streamlined continuation of Order No. 14-288.²

If there’s not a lot of change from quarter to quarter you can submit a report rather than come in.³

PacifiCorp is providing the attached written report for the period of January 1, 2024 through June 30, 2024. PacifiCorp can also provide a presentation of its update if the Commission has any questions or concerns with the information provided.

The report consists of two updated PowerPoint slide decks: the Semi-Annual DSM Update and the Environmental Compliance and Transmission Investment Update. The Semi-Annual DSM Update slide deck provides an update on the 2024 targeted energy savings forecast by state. The

¹ LC 57, Order No. 14-288.

² LC 62, Order No. 16-071.

³ Public Utility Commission of Oregon, December 20, 2016 Public Meeting, Archived Video at 1:44:26.

Public Utility Commission of Oregon

September 30, 2024

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Environmental Compliance and Transmission Investment Update slide deck includes updates throughout, building upon information provided in PacifiCorp's last update.

Please direct any questions regarding this report to Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

Sincerely,

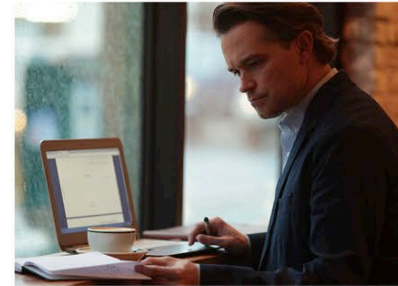
A handwritten signature in black ink, appearing to read "Matthew McVee", written in a cursive style.

Matthew McVee
Vice President, Regulatory Policy and Operations

Enclosures

PacifiCorp Semi-Annual Demand Side Management Update

First Update for 2024



Class 2 Energy Resource Acquisitions

State Wide Energy Savings Results (aMW)			
State	1/1/2024 - 06/30/2024		
	Actuals	Target	% of Target Achieved
CA	0.04	0.31	13%
ID	1.33	1.7	78%
OR	7.69	21.52	36%
UT	13.89	30.44	46%
WA	1.79	4.52	40%
WY	2.5	4.39	57%
Total	27.24	62.88	43%

Note: The reported savings in the table above are preliminary for January – June 2024. The estimated savings results are at generation and are gross. The source of the 2024 targets is the energy efficiency and home energy report selections from the 2023 IRP preferred portfolio, converted from MWh to aMW.

Additional Information

Additional information on Class 2 energy resource acquisitions can be found on PacifiCorp's website under the "Reports and Program Evaluations by State" section at:

<https://www.pacificorp.com/environment/demand-side-management.html>



PacifiCorp Semi-Annual Environmental Compliance and Transmission Investment Update

First Update for 2024



Transmission Updates



- Western Energy Imbalance Market
- Extended Day Ahead Market
- Transmission Project Development
- Paris Agreement
- Regional Haze
- National Ambient Air Quality Standards
- Coal Combustion Residuals
- Clean Water Act



Western Energy Imbalance Market (WEIM)

WEIM – Calculated Benefits

2024



BAA	Jan-Mar 2024	Apr-Jun 2024	Jul-Sept 2024	Oct-Dec 2024	Total 2024
ISO	\$54.33 M	\$36.02 M			\$90.35 M
PacifiCorp	\$73.83 M	\$27.35 M			\$101.18 M
NV Energy	\$32.77 M	\$33.65 M			\$66.42 M
Arizona Public Service	\$5.54 M	\$4.57 M			\$10.11 M
Puget Sound Energy	\$25.88 M	\$8.26 M			\$34.14 M
Portland General Electric	\$22.00 M	\$11.25 M			\$33.25 M
Idaho Power	\$11.30 M	\$15.57 M			\$26.87 M
Powerex	\$24.83 M	\$18.73 M			\$43.56 M
BANC/SMUD	\$20.78 M	\$49.90 M			\$70.68 M
Seattle City Light	\$5.76 M	\$4.87 M			\$10.63 M
Salt River Project	\$22.35 M	\$20.93 M			\$43.28 M
Turlock Irrigation District	\$1.22 M	\$0.98 M			\$2.20 M
Los Angeles Department of Water and Power	\$46.80 M	\$30.52 M			\$77.32 M
Public Service Company of New Mexico	\$7.30 M	\$11.20 M			\$18.51 M
Northwestern Energy	\$7.07 M	\$7.88 M			\$14.95 M
Avista Utilities	\$7.79 M	\$2.95 M			\$10.74 M
BPA	\$18.11 M	\$4.72 M			\$22.83 M
Tacoma Power	\$6.79 M	\$5.44 M			\$12.23 M
Tucson Electric Power	\$9.11 M	\$8.02 M			\$17.13 M
Avangrid	\$10.14 M	\$8.56 M			\$18.70 M
El Paso Electric	\$6.08 M	\$3.09 M			\$9.17 M
WAPA Desert Southwest	\$16.52 M	\$50.57 M			\$67.09 M
Total	\$436.30 M	\$365.04 M			\$801.34 M

Total WEIM Benefits November 2014 – June 2024



BAA	Total
ISO	\$978.72 M
PacifiCorp	\$846.47 M
NV Energy	\$521.69 M
Arizona Public Service	\$416.43 M
Puget Sound Energy	\$187.86 M
Portland General	\$294.33 M
Idaho Power	\$267.77 M
Powerex	\$261.43 M
BANC/SMUD	\$685.80 M
Seattle City Light	\$63.67 M
Salt River Project	\$299.66 M
Turlock Irrigation District	\$24.92 M
Los Angeles Department of Water and Power	\$344.08 M
Public Service Company of New Mexico	\$110.02 M
Northwestern Energy	\$89.21 M
Avista Utilities	\$55.67 M
BPA	\$84.60 M
Tacoma Power	\$44.24 M
Tucson Electric Power	\$86.93 M
Avangrid	\$38.92 M
El Paso Electric	\$22.17 M
WAPA Desert Southwest	\$67.09 M
Total	\$5.85 B

Prospects for WEIM Expansion



- PacifiCorp is supportive of broader market participation & coordination; the CAISO approach and WEIM design is highly scalable for added participation.
- NV Energy WEIM implementation occurred December 2015, Puget Sound Energy and Arizona Public Service WEIM implementation occurred October 2016, Portland General Electric WEIM implementation occurred October 2017, Idaho Power Company and Powerex Corp WEIM implementation occurred April 2018, Balancing Authority of Northern California, with the Sacramento Municipal Utilities District WEIM implementation occurred April 2019, and Salt River Project and Seattle City Light WEIM implementation occurred April 2020. Public Service Company of New Mexico, the Los Angeles Department of Water and Power, Turlock Irrigation District, and Balancing Authority of Northern California Phase 2 joined the WEIM April 2021, and Northwestern Energy joined June 2021. Avista, Tacoma Power, Tucson Electric Power, and Bonneville Power Administration implemented the WEIM in spring 2022. El Paso Electric, Western Area Power Administration (WAPA) Desert Southwest, and Avangrid joined the WEIM in April 2023. Recently, BHE Montana and Black Hills Power signaled their intention to join the WEIM in 2026.
- The WEIM now represents nearly 80% of the demand for electricity in the Western Interconnection.



Extended Day Ahead Market (EDAM)

Extended Day Ahead Market



- Stakeholders from across the Western Interconnection began working with the California ISO (CAISO) on developing the EDAM in October 2019.
- Following the publication of the finalized market design, on December 8, 2022, PacifiCorp announced to join to advance PacifiCorp's commitment to customers to provide reliable, affordable and clean power on demand.
- On February 1, 2023, the CAISO Board of Governors and WEIM Governing Body jointly approved the EDAM proposal.
- The CAISO filed the EDAM tariff with the Federal Energy Regulatory Commission (FERC) on August 22, 2023, and FERC approved the tariff revisions on December 20, 2023.
- Since April 16, 2024, PacifiCorp has engaged in a formal stakeholder process to refine its FERC tariff before filing in mid-November 2024.
- On April 26, 2024, PacifiCorp formalized its agreement to join EDAM and became the first entity to sign the CAISO's implementation agreement.
- PacifiCorp has been working with the CAISO and internal personnel on its implementation activities to ensure readiness before EDAM go-live on May 1, 2026.



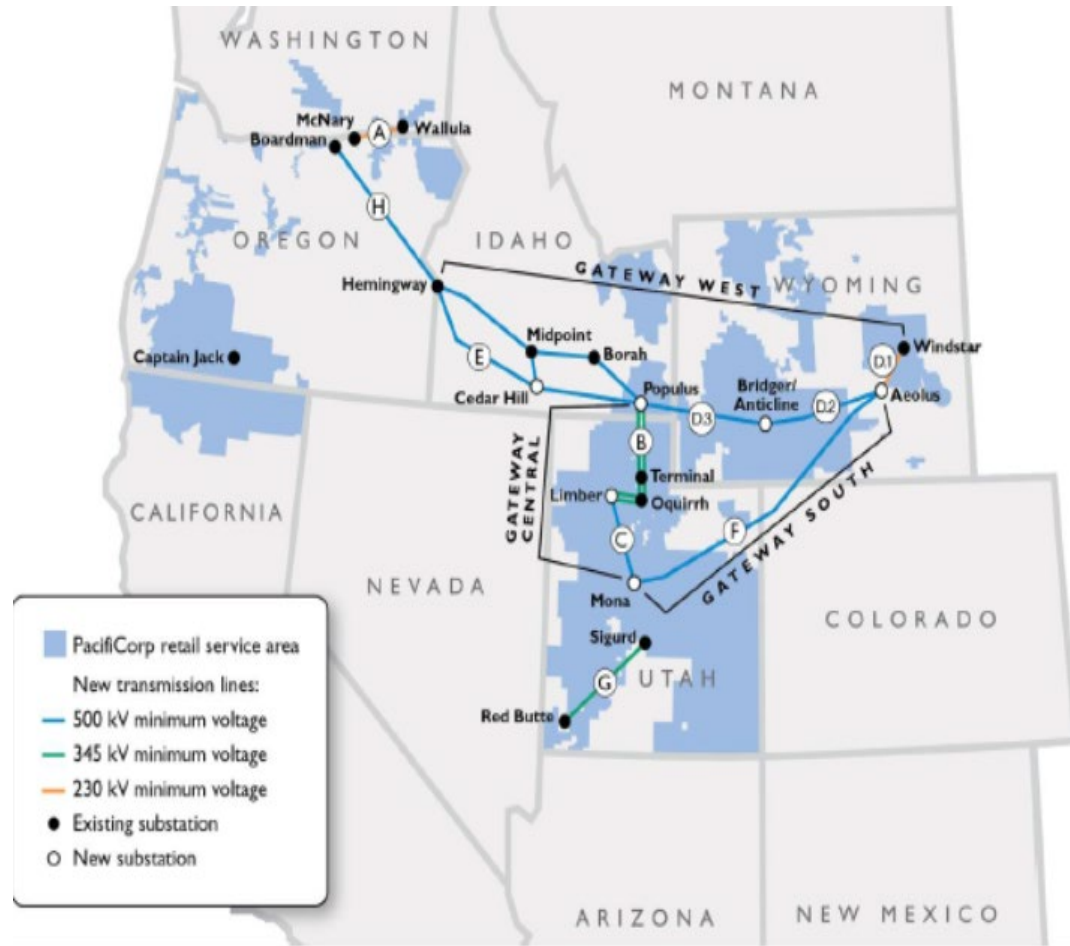
Transmission Project Development

Energy Gateway Program Status



Over \$11 billion total investment planned; \$2.96 billion placed in-service

- Gateway West
 - BLM record of decision on 8 of 10 segments November 2013
 - BLM record of decision on last 2 segments April 2018
 - Planned in-service 2028-2036
- Gateway South
 - BLM record of decision December 2016
 - Planned in-service 2024
- Boardman-to-Hemingway
 - BLM record of decision December 2017
 - Oregon Energy Facility Siting Council site certificate obtained March 2023
 - Planned in-service 2027
- **Segments In-Service**
 - Populus-to-Terminal November 2010
 - Mona-to-Oquirrh May 2013
 - Sigurd-to-Red Butte May 2015
 - Wallula to McNary January 2019
 - Aeolus-to-Jim Bridger/Anticline November 2020



This map is for general reference only and reflects current plans. It may not reflect the final routes, construction sequence or exact line configuration.



Paris Agreement

Paris Agreement



- In December 2015, 197 nations and entities negotiated the Paris Agreement, a coordinated action on climate change under the United Nations Framework Convention on Climate Change.
 - The Paris Agreement became effective November 4, 2016.
- The Paris Agreement reaffirmed the goal of limiting global temperature increases to less than 2 degrees Celsius and established the following commitments by all parties:
 - Establish and report “nationally determined contributions” (NDCs) to reduce emissions and adapt to climate change.
 - Take stock of progress toward long-term goals based on five-year reporting cycle.
 - Establish NDCs based on progress toward long-term goals, allowing NDCs to reflect the appropriate level of ambition.
- The Paris Agreement obligates the United States to reduce greenhouse gas emissions by 26-28% from 2005 levels by 2025.

Paris Agreement



- Under the Trump administration, the United States announced its withdrawal from the Paris Agreement, a process which was completed on November 4, 2020.
- Under the Biden administration, the United States reaccepted the terms of the Paris Agreement and re-entered the agreement on February 19, 2021.
- At a climate leaders summit April 22-23, 2021, the United States announced new goals to reduce greenhouse gas emissions by 50 - 52% economy-wide by 2030 compared to 2005 levels, and to reach 100% carbon pollution-free electricity by 2035.
- The Inflation Reduction Act was signed into law on August 16, 2022. The law aims to invest in domestic energy production while promoting clean energy, among other infrastructure investments and is projected to bring the United States significantly closer to the goal of reducing greenhouse gases to 50% below 2005 levels by 2030.



Regional Haze

Utah Regional Haze Compliance



- First Planning Period
 - Utah's first planning period regional haze SIP was approved.
- Second Planning Period (2018-2028)
 - PacifiCorp submitted a Regional Haze Reasonable Progress Analysis to the Utah Department of Environmental Quality (UDAQ) in 2020 for PacifiCorp's Huntington and Hunter plants for the regional haze second planning period.
 - UDAQ did not adopt PacifiCorp's proposed Reasonable Progress plan and instead presented a SIP to the Utah Air Quality Board in April 2022 that focused on a three-tier NOx emission reductions strategy at the Hunter and Huntington plants.
 - On June 6, 2022, the Utah Air Quality Board voted to approve Utah's Regional Haze SIP for second planning period, which ultimately includes updated 12-month rolling mass-based nitrogen oxide limits for the Hunter and Huntington plants as well as a sulfur dioxide rate-based limit.
 - Utah submitted the SIP to EPA for review in August 2022. The agency took no action within the required 18 months, so Utah and PacifiCorp sued to force the agency to make a decision on the SIP.
 - Through a settlement, EPA ultimately agreed to take final action on Utah's regional haze second planning period SIP by November 22, 2024.
 - PacifiCorp submitted comments on September 18, 2024.

Wyoming Regional Haze Compliance

- First Planning Period (2008-2018)
 - Dave Johnston Unit 1&2: no new control requirements (approved)
 - Dave Johnston Unit 3: shut-down by 2027 (approved)
 - Dave Johnston Unit 4: installed LNB and OFA (0.15 lb/MMBtu NOx rate) (approved)
 - Jim Bridger Units 1&2: gas conversion (proposed approval)
 - Jim Bridger Units 3&4: installed SCR in 2015, and 2016, respectively (approved)
 - Naughton Units 1&2: installed LNB and OFA (0.26 lb/MMBtu NOx rate) (approved)
 - Naughton Unit 3: converted to gas in 2019 (approved)
 - Wyodak Unit 1: (remanded to EPA)
- Second Planning Period (2018-2028)
 - Wyoming DEQ submitted the state's regional haze second planning period SIP to EPA in August 2022, stating that existing control measures for PacifiCorp units in Wyoming (Naughton, Jim Bridger, Dave Johnston, and Wyodak) are sufficient to meet regional haze requirements and no additional emission controls are necessary.
 - The agency took no action within the required 18 months, so Wyoming and PacifiCorp sued to force the agency to make a decision on the SIP.

Wyoming Regional Haze Compliance

- Second Planning Period (2018-2028) (continued)
 - Under a settlement, EPA ultimately agreed to take final action on Wyoming's regional haze second planning period SIP by November 22, 2024.
 - On July 31, 2024, EPA proposed to partially approve and partially disapprove Wyoming's regional haze SIP for the second planning period. The comment period on the proposal is 30 days.
 - PacifiCorp submitted comments on September 3, 2024.
 - PacifiCorp is reviewing the proposed rule and will consult with Wyoming to submit comments on the proposal. Should the agency finalize the proposed disapproval, PacifiCorp will have the option of filing a petition for review of the agency's action in the 10th Circuit Court of Appeals.

Non-Operated Plants Regional Haze Compliance



- First Planning Period – Colorado
 - Tri-State’s environmental compliance staff and counsel negotiated an agreement in principle with EPA, CDPHE, WildEarth Guardians, and the National Parks Conservation Association on an alternate Regional Haze compliance strategy incorporating accelerated retirement for Craig Unit 1. The agreement will result in a year-end 2025 shutdown with certain interim NOx emission reduction commitments from the partner owners.
 - The state of Colorado’s Air Quality Board approved the agreement during a hearing held on December 15, 2016.
 - May 27, 2017 – CDPHE submitted SIP amendment documentation to EPA Region 8.
 - EPA approved Colorado’s Regional Haze SIP, effective August 6, 2018. Revisions to the SIP include source-specific revisions to the NOx best available retrofit technology (BART) determination for Craig Unit 1.
 - The state of Colorado Regional Haze SIP also required SCR controls at Craig Unit 2 and Hayden Units 1 and 2, in which PacifiCorp has ownership interests. Each of those regional haze compliance projects are already in service.

Non-Operated Plants Regional Haze Compliance



- Second Planning Period - Colorado
 - In 2020, the joint-owners of Craig Unit 2 and Hayden Units 1 and 2 agreed on retirement dates for the units. The state of Colorado's regional haze SIP for the second planning period was adopted by the Colorado Air Quality Control Commission in 2020 and 2021. The SIP includes voluntary retirements of Craig Unit 2 in 2028 and Hayden Units 1 and 2 by 2028 and 2027, respectively.



National Ambient Air Quality Standards

National Ambient Air Quality Standards



One-hour NO₂ & SO₂ Standards

- NO₂ – All areas of the country designated as attainment/unclassifiable.
- SO₂ – EPA published the Air Quality Designations for the 2010 SO₂ NAAQS Round 3, classifying counties of Emery, Campbell, Lincoln and Eastern Sweetwater —as attainment/unclassifiable. In April 2021, EPA also classified Converse County as attainment/unclassifiable.

Fine Particulate (PM_{2.5}) Standard

- May 2017 – EPA reclassified Salt Lake City and Provo nonattainment areas from moderate to serious nonattainment for the 2006 24-hour PM_{2.5} NAAQS. PacifiCorp's Lake Side and Gadsby facilities were identified as major sources in these areas.
- January 2019 – Utah's Air Quality Board adopted source specific emission limits and operating practices in the PM_{2.5} SIP, which incorporated the current emission and operating limits for the Lake Side and Gadsby facilities.
- April 2021 – EPA determined Salt Lake City and Provo attained the 2006 24-hour PM_{2.5} NAAQS and proposed to approve Utah's state plan to redesignate these areas as attainment. EPA from 12.0 µg/m³ to 9.0 µg/m³
- February 2024 – EPA revised the primary annual PM_{2.5} standard by lowering the level from 12.0 µg/m³ to 9.0 µg/m³.

National Ambient Air Quality Standards

- 8-hour Ozone Standard

- October 2015 – EPA lowered the 8-hour ozone standard from 75 parts per billion (ppb) to 70 ppb.
- April 6, 2022 – The EPA proposed a federal implementation plan (FIP) for the 2015 Ozone NAAQS cross-state transportation requirements. The proposed rule addressed 26 states’ significant contribution to nonattainment, or interference with maintenance, of the 2015 ozone NAAQS in other states by establishing NOx emissions budgets requiring fossil-fueled power plants to participate in an allowance-based ozone season trading program beginning in 2023. Utah and Wyoming were included in the federal plan, which significantly reduces NOx emission allowances beginning in 2026.
- May 24, 2022 – EPA proposed to deny the interstate transport portions of the Utah and Wyoming SIPs for the 2015 ozone standard. This disapproval subjects the states to the proposed FIP.
- June 21, 2022 – PacifiCorp, under BHE, submitted comments in opposition of the proposed FIP on, drawing attention to several concerns with the proposed rule.
- July 25, 2022 – PacifiCorp submitted comments in opposition to the EPA’s proposed disapproval of both Utah and Wyoming’s’ SIPs for cross-state transport for the 2015 8-hour Ozone NAAQS.
- February 13, 2023 – EPA published its final disapproval of Utah’s SIP in the Federal Register. The agency deferred action on Wyoming’s SIP to December 15, 2023. PacifiCorp and the states of Utah and Wyoming petitioned EPA's actions on the SIPs in the Tenth Circuit Court of Appeals.
- July 27, 2023 – The Tenth Circuit Court of Appeals granted a stay of EPA’s disapproval of Utah's SIP. The FIP requirements may not be imposed while the stay is in place.
- December 19, 2023 – EPA finalized approval of the Wyoming SIP addressing the cross-state transport for the 2015 8-hour Ozone NAAQS.

National Ambient Air Quality Standards



- Ozone Standard - Utah

- May 2018 – The Northern Wasatch Front Area in Utah was designated as Marginal nonattainment for Ozone. The nonattainment area (NAA) was required to attain the ozone standard by August 3, 2021, for marginal classification.
- November 7, 2022 – The Northern Wasatch Front NAA did not attain the standard by the attainment date and was reclassified to moderate. The Northern Wasatch Front NAA is required to attain the ozone standard by August 3, 2024, for moderate classification based on data from 2021, 2022, and 2023. The Gadsby power plant is a major source of ozone in the area.
- September 25, 2023 – The Utah Department of Environmental Quality submitted their moderate ozone SIP. EPA determined the SIP to be complete on October 11, 2023. Although the Gadsby Power plant is included in the plan, it is unaffected by any additional requirements.
- Recent monitoring data indicates that the Northern Wasatch Front NAA will not attain the standard and will be reclassified to serious nonattainment status in February of 2025. Utah Department of Environmental Quality asked all major sources of ozone to submit reasonably available control technology (RACT) analysis to the state by January 2, 2024, in preparation of likely serious nonattainment reclassification. As a major source in the Northern Wasatch Front NAA, the Gadsby power plant submitted a RACT analysis. The RACT analysis demonstrated that no additional controls at the Gadsby Power Plant are cost effective at this time.



Coal Combustion Residuals (CCR)

Coal Combustion Residuals



- PacifiCorp operates seven impoundments and four landfills that are subject to the CCR rule.
 - Three additional impoundments have been closed according to the CCR regulations and two are currently in the process of being closed.
- Required groundwater monitoring established that four impoundments and two landfills have impacted groundwater and require remediation. PacifiCorp is preparing remedies for each site based on regulatory requirements and public input.
 - Remedies have been selected for the two landfills and two of the impoundments. Additional investigation is necessary before a remedy can be selected for the remaining two impoundments.
- Utah adopted the federal final rule as state law in September 2016.
- August 2017, EPA proposed permitting guidance on how states' CCR programs should comply with the requirements of the final rule.
- July 2019, Wyoming proposed adoption of a state CCR law, which was signed by the Governor and submitted to EPA for primacy approval in February 2023. The EPA recently rejected Wyoming's application due to concerns about the state's ability to meet federal standards for the safe management of coal ash.

Coal Combustion Residuals



- It is anticipated that Utah will also submit an application to EPA for primacy approval, but the timing of the submission remains uncertain.
- UDEQ issued the final permit for Huntington Power Plant CCR Landfill for PacifiCorp on March 21, 2023, and for Hunter Power Plant CCR Landfill on May 15, 2024.
- EPA published the final CCR Phase I Part A rule on August 28, 2020. The rule requires unlined CCR surface impoundments to cease receipt of waste and initiate closure as soon as technically feasible but no later than April 11, 2021. The rule establishes the requirements for alternative closure deadlines and other reporting and monitoring requirements.
- PacifiCorp submitted an alternative closure demonstration for the Naughton Plant on October 23, 2020. If approved by EPA, the demonstration will allow the South Ash Pond to continue to receive CCR and non-CCR wastestreams past April 11, 2021. To be eligible for the extension, the Naughton plant must cease operation of coal fired boilers and complete closure of the CCR surface impoundment by October 17, 2028. Under the CCR Rule, the April 11, 2021, deadline is tolled until EPA responds to the submission.
- The North Ash pond at Naughton ceased receiving waste on April 9, 2021, in compliance with the Part A rule.

Coal Combustion Residuals



- PacifiCorp submitted an alternative closure demonstration for the FGD Pond 2 at the Jim Bridger Plant to EPA on November 5, 2020. October 12, 2023, Jim Bridger FGD Pond 2 ceased receiving waste, and the new replacement pond came into service. The EPA was notified on October 12, 2023, of PacifiCorp's withdrawal of its pending Part A alternative closure demonstration request.
- EPA has announced decisions on several CCR Part A demonstrations and is expected to announce several additional decisions by end of 2024.
- EPA published a rule governing the disposal of CCR from electric utilities addressing legacy CCR surface impoundments and CCR management units on May 8, 2024. The final rule establishes groundwater monitoring, corrective action, closure, and post closure care requirements for these units. The effective date of the final rule is November 8, 2024.



Clean Water Act

Clean Water Act



Effluent Limit Guidelines (ELG)

- EPA published the final ELG for steam electric generating units in the *Federal Register* on November 3, 2015.
- September 2017, EPA postponed compliance dates for FGD and bottom ash transport water to “as soon as possible beginning” November 1, 2020, and announced its intent to conduct new rulemaking.
- October 2020, EPA finalized the ELG Reconsideration Rule, adjusting the “as soon as possible” deadline for compliance with bottom ash transport wastewater requirements to October 13, 2021, and the “no later than” deadline to December 31, 2025.
 - PacifiCorp operates one plant, the Dave Johnston Plant, that discharges bottom ash transport wastewater.
 - The plant submitted a notice of planned participation to the Wyoming Department of Environmental Quality for units ceasing coal combustion by December 31, 2028.
 - The notice included an option to install an ELG compliant technology at a later date if PacifiCorp determines it to be the best option.
 - A final permit incorporating ELG compliance options is anticipated in 2024.

Clean Water Act



Effluent Limit Guidelines (ELG)

- On April 25, 2024, EPA finalized the Supplemental Effluent Limitations Guidelines and Standards for the Steam Electric Generating Point Source Category (2024 ELG Rule or Final Rule), which applies to wastewater discharges from coal-based generating units, establishing pollution control requirements. This Rule builds upon the 2015 and 2020 ELG Rules.
- The 2024 ELG Rule requires zero liquid discharge (ZLD) at coal-based generating units for the following waste streams:
 - Bottom ash transport water (BATW)
 - Flue gas desulfurization (FGD) wastewater
 - Coal combustion residual leachate (CRL)
- The deadline for compliance for these waste streams is December 31, 2029. However, the Final Rule provides compliance flexibilities for coal-based generating units that will soon retire/repower by December 31, 2028, or December 31, 2034.

Clean Water Act



316(b) Cooling Water Intake Structure Rule

- PacifiCorp operates six plants subject to the 316(b) Rule, including Dave Johnston, Gadsby, Hunter, Huntington, Jim Bridger and Naughton.
- EPA published the final 316(b) Rule for steam electric generating units in the *Federal Register* on August 15, 2014.
- The rule requires submittal of Permit Application Requirements (PARs) for all six plants, which were timely submitted.
- May 2019, PacifiCorp submitted an application to renew the Dave Johnston Wyoming Pollutant Discharge Elimination System (WYPDES) wastewater discharge permit. Stakeholders, including PacifiCorp, submitted comments during three public comment periods (December 2019, August 2020, and April 2023). The Wyoming Division of Water Quality has not taken final action on the application, but a final permit is expected in 2024.