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October 26, 2018

VIA ELECTRONIC FILING

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

Attn: Filing Center

RE: LC 70—PacifiCorp's Motion to Modify Commission Order No. 18-360—Expedited Consideration Requested

PacifiCorp d/b/a Pacific Power encloses for filing its Motion to Modify Commission Order No. 18-360.

Please direct any questions on this filing to Natasha Siores, Manager, Regulatory Affairs, at (503) 813-6583.

Sincerely,

Etta Lockey
Vice President, Regulation

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 70

In the Matter of
PACIFICORP, d/b/a PACIFIC POWER
2019 Integrated Resource Plan.

MOTION TO MODIFY
COMMISSION ORDER NO. 18-360
*EXPEDITED CONSIDERATION
REQUESTED*

In accordance with OAR 860-001-0420 and ORS 756.568, PacifiCorp d/b/a Pacific Power respectfully requests that the Public Utility Commission of Oregon (Commission) grant its motion to modify Order No. 18-360 issued on September 28, 2018 (Order). The Order adopted Staff’s recommendation regarding next steps associated with PacifiCorp’s coal analysis for the 2019 integrated resource plan (IRP). The Order included adoption of certain dates for presentation of the results of the company’s updated coal analysis to the Commission and Oregon stakeholders.

As detailed below, despite the company’s diligent efforts to complete its updated coal analysis, additional time is necessary to ensure that complete and accurate results are provided to the Commission and stakeholders in this proceeding. PacifiCorp is not requesting any substantive changes to the directives contained in the Order, only an extension of time to complete the updated analysis.

Pursuant to ORS 756.568, the Commission may at any time rescind, suspend, or amend any orders it has issued. Here, the Order directs PacifiCorp to hold an Oregon-specific stakeholder meeting in early November to present the results of its updated coal analysis and to report back to the Commission (together with Staff) at a public meeting in mid-November on the

results of the updated analysis and the degree to which stakeholders, Staff, and PacifiCorp are in agreement about the usefulness and appropriateness of the analysis.¹ These meetings are currently scheduled for November 8, and November 20, 2018, respectively. In addition to these meetings scheduled in compliance with the directives contained in the Order, the company had previously scheduled an IRP stakeholder meeting for November 1–2, 2018; PacifiCorp intended to provide the results of its updated coal analysis to stakeholders in all states within its service territory at this stakeholder meeting.

PacifiCorp has been working diligently to complete this additional coal analysis in advance of the November 1–2, 2018 stakeholder meeting. As part of this updated analysis, a number of modeling enhancements have been made; these enhancements were discussed with stakeholders at the company’s September IRP meeting (held on September 27–28, 2018) and will better reflect transmission and an expanded number of resource options for the model to select from including resources to differentiate customer preference resources and additional renewable resource types and locations. The modeling enhancements also respond to and incorporate stakeholder feedback where possible regarding key modeling assumptions (*e.g.*, updated supply-side resource table costs).

While the company has been working diligently to perform these additional modeling runs, model run times and performance have created challenges with respect to being able to complete the volume of studies necessary in the time period provided. Due to the sheer number of additional runs and associated longer run times, it has become clear that it will not be possible to complete the volume of studies necessary to have results to discuss at the November 1–2, 2018 IRP meetings. As a result, PacifiCorp respectfully requests that the Order be modified to

¹ *In the Matter of PacifiCorp dba Pacific Power, 2019 Integrated Resource Plan*, Docket No. LC 70, Order No. 18-360, at 1, Appendix A at 6 (Sep. 28, 2018).

allow additional time to complete this analysis. Without additional time only partial results will be available on the dates set forth in the Order and distribution of these partial results are likely to result in stakeholder confusion.

PacifiCorp proposes the following timing for the Commission's consideration:

November 1, 2018: hold a one day six-state IRP public input meeting and provide an update on progress of the coal analysis and discuss how stakeholder input is being incorporated into the model as part of a modified meeting agenda (November 2, 2018 IRP public input meeting would be canceled);

November 8, 2018: hold an Oregon-specific stakeholder conference call to discuss the status of the updated coal analysis.

December 3–4, 2018: present the updated coal analysis to stakeholders at the already scheduled six-state IRP public input meeting;

Week of December 10, 2018: hold Oregon-specific stakeholder meeting to discuss the updated coal analysis results;

December 18, 2018: Staff and PacifiCorp will report to the Commission regarding the results of the updated analysis and the degree to which stakeholders, Staff, and PacifiCorp are in agreement about the usefulness and appropriateness of the analysis (this will replace presentation of the report currently scheduled to be provided at the Commission's November 20, 2018 public meeting).

These modifications will not change the substance or spirit of the process adopted by the Commission in the Order. It is purely a shift in timing of the results and not in the approach (*i.e.*, methodology) previously discussed with stakeholders. Instead, these modifications simply shift the timing of the process by approximately four (4) weeks to allow the company sufficient time

to complete the updated analysis including consideration of stakeholder feedback. These modifications to the timing of the coal analysis will also not preclude the Commission from requesting additional steps for the analysis to inform the 2019 IRP, or from requesting additional portfolios and retirement dates to be considered as contemplated by the Order.² PacifiCorp notes that it previously requested stakeholder and Commission feedback in November to allow time to consider feedback as part of the 2019 IRP development. This modified timeline does not alter PacifiCorp's efforts and commitment to work with stakeholders and the Commission to allow for meaningful stakeholder input into the 2019 IRP.

PacifiCorp has consulted with stakeholders and is authorized to represent that the Alliance of Western Energy Consumers, the Oregon Citizens' Utility Board, Northwest Energy Coalition, Renewable Northwest, Sierra Club, and Staff do not oppose this proposal to modify the dates set forth in the Order. Therefore, PacifiCorp respectfully requests that the Commission grant its motion to amend the dates set forth in the Order to allow sufficient time to perform and present the complete results from the updated coal analysis to the Commission and stakeholders.

PacifiCorp requests expedited consideration of this motion pursuant to OAR 860-001-0420(6) due to the current schedule that requires presentation of the results of the updated coal analysis at an Oregon-specific stakeholder meeting in early November.

Respectfully submitted this 26th day of October, 2018.

By: 
Matthew McVee
Chief Regulatory Counsel
PacifiCorp d/b/a Pacific Power

² *Id.*, Appendix A at 6 (Sep. 28, 2018).