

November 13, 2019

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 2019 Integrated Resource Plan Update

Pursuant to the Public Utility Commission of Oregon’s integrated resource plan (IRP) Guidelines, the company is required to submit an annual IRP update on or before the “anniversary of the acknowledgment date” of its IRP.¹ On October 30, 2019 the Administrative Law Judge issued a scheduling memorandum in this proceeding that sets the tentative date for the acknowledgment order as May 5 or May 7, 2020. Under this schedule, its 2019 IRP update would be due on or before May 5 or May 7, 2021. For the reasons set forth below, PacifiCorp respectfully provides notice that it does not plan to file a 2019 IRP Update in 2021, but instead will focus its efforts on the acknowledgement and acceptance process of the 2019 IRP and the preparation for the 2021 IRP which has a target filing date of March 2021 (*i.e.*, before the deadline for the 2019 IRP update).

First, PacifiCorp’s 2019 IRP was recently filed October 18, 2019, rather than the typical end of quarter one filing which would have been March 31, 2019. PacifiCorp will not have received written acknowledgement orders or letters on the 2019 IRP from its state commissions before the date on which PacifiCorp would typically file an update—in this case, the 2019 IRP Update, originally targeted for March 31, 2020. If in their orders and letters the state commissions request that PacifiCorp provide certain information in its IRP Update, PacifiCorp would be unable to do so. PacifiCorp will also be starting the 2021 IRP pre-IRP studies and process to begin its 2021 IRP public-input process as it normally does around the June 2020 timeframe in order to file the 2021 IRP at the end of March 2021.

Second, as technologies and the planning and regulatory environment continue to evolve, PacifiCorp has a need to evaluate and implement, if possible, new and improved modeling software. In the 2019 IRP cycle alone, PacifiCorp experienced delays due to performance issues despite also being able to improve and expand upon the modeling capabilities of its existing modeling software. Due to the continuous IRP modeling cycle, it is nearly impossible to achieve a window to conduct such an evaluation and implementation, and not filing the 2019 IRP Update would provide a small window to pursue this much needed effort.

Please feel free to direct any inquiries regarding this matter to Shay LaBray, Director Resource Planning, at (503) 813-6176 or Cathie Allen, Regulatory Affairs Manager, at (503) 813-5934.

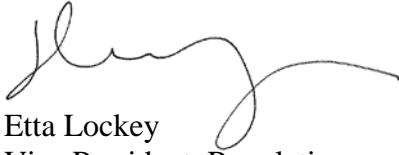
¹ Integrated Resource Plan Guidelines, § 3(f).

Public Utility Commission of Oregon

November 13, 2019

Page 2

Sincerely,

A handwritten signature in black ink, appearing to read 'Etta Locky', with a long, sweeping horizontal stroke extending to the right.

Etta Locky

Vice President, Regulation