

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

LC 85

In the Matter of

PACIFICORP dba PACIFIC POWER,

2025 Integrated Resource Plan and Clean
Energy Plan.

REDACTED COMMENTS OF
RENEWABLE NORTHWEST

July 29, 2025

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I. Executive Summary

Renewable Northwest (“RNW”) appreciates the opportunity to comment on PacifiCorp’s (PacifiCorp or “the Company”) 2025 Integrated Resource Plan (“IRP”). The 2025 IRP is PacifiCorp’s second resource plan since the passage of House Bill 2021 (“HB 2021”) - Oregon’s clean energy law that requires utilities to reduce greenhouse gas (“GHG”) emissions 80% by 2030, 90% by 2035, and 100% by 2040. During the previous IRP review cycle, RNW expressed concerns with PacifiCorp’s HB 2021 compliance pathways, lack of progress on procurement, reliability modeling, and integration of the Western Resource Adequacy Program (“WRAP”) requirements. Many of these concerns have carried through to the 2025 IRP and have only grown more urgent as the deadline to meet HB 2021’s 2030 mandate approaches.

RNW remains deeply concerned with PacifiCorp’s lack of progress towards the development and execution of a viable plan to meet the needs of its Oregon customers. Despite significant and rising resource needs for Oregon customers, PacifiCorp’s 2025 IRP fails to meet basic modeling and planning standards for its western loads, while introducing a problematic and unvetted new resource allocation framework that risks unduly influencing and presupposing allocation questions among jurisdictions. While these planning concerns are troubling, of even greater concern is PacifiCorp’s demonstrated inability to actualize its resource plans, a reality that now places PacifiCorp’s customers in reliability and financial risk. These risks – already significant and expensive at the time of the 2025 IRP’s filing – have only grown given recently chaptered federal legislation sunseting federal tax credits for solar and wind resources.

The combination of the urgency and magnitude of customer needs and PacifiCorp’s demonstrated inability to meet those needs presents difficult options for PacifiCorp’s regulators. In addition to the reliability and economic impacts of PacifiCorp’s significant open energy and capacity position on the west side, the window to capture federal tax credits for much-needed solar and wind resources is closing rapidly. PacifiCorp’s western system faces thousands of megawatts (“MWs”) of reliability need as the company’s integrated approach to system planning collides with the realities of its transmission-constrained system and its rapidly fading ability to rely on market purchases from neighboring utilities. This reality, and the deeply problematic analytical construct to support jurisdictional allocation introduced in the 2025 IRP, are discussed in Section II.

PacifiCorp’s reliability imbalance is greatly exacerbated by the company’s proposed elimination of the Boardman-to-Hemingway (“B2H”) transmission project, a major modification to nearly two decades of PacifiCorp planning eliminated in a passing breath in the IRP. PacifiCorp’s rationale and documentation for the removal are scant and suspect while the detrimental impacts

to Oregon customers are in the billions of dollars. As discussed in Section III, the Public Utility Commission of Oregon (“Commission” or “OPUC”) should firmly reject this proposal and direct PacifiCorp to continue its development of B2H in service of its captive customers.

Regardless of the significant resource needs of Oregon customers and the threatened compounding of these needs through PacifiCorp’s B2H proposal, PacifiCorp has yet to take meaningful action to execute contracts to meet these needs. Since filing the 2023 IRP, PacifiCorp has executed on, through bilateral contracts, only a tiny fraction of resources needed to meet customer needs – and not a single utility-scale project contributing to reliability needs on its western system. This follows on PacifiCorp’s 2024 cancellation of its primary clean energy solicitation, the 2022 All-Source Request for Proposals (“RFP”), and the 2022 RFP’s long overdue replacement with a solicitation for Oregon resources which may be too narrow and too late to address requirements for WRAP and with very limited slack to meet deadlines for HB 2021. These repeated delays now jeopardize PacifiCorp from capturing billions of dollars in federal tax credits, though the window of action is not yet closed. While RNW appreciates PacifiCorp’s identification of needs to be met with proxy resources in the 2025 IRP, as it has in past IRPs, RNW recommends the Commission take more affirmative action to ensure these identified urgent needs materialize into expedited procurement action. The risks discussed above, and recommendations for immediate and intermediate actions are discussed in Section IV.

The growing chasm between Oregon’s energy system needs and the capabilities of its utility to meet those needs merits bold action from Oregon’s regulators. RNW urges OPUC to direct PacifiCorp to act swiftly to address these critical deficiencies while there is still time to mitigate the worst harms of PacifiCorp’s inaction. Specifically, we recommend the Commission direct the following four actions:

1. The Commission should direct PacifiCorp under OAR 860-089-0100(2)(c) to initiate an expedited procurement effort to identify and execute on clean energy projects capable of capturing federal tax credits prior to the upcoming federal deadlines. Under the current, unique circumstances, RNW encourages PacifiCorp to follow an “open call” framework for projects with development and interconnection timelines aligned with federal constraints.¹ While the solicitation should not be constrained to Oregon or PacifiCorp-West (“PACW”), resources’ contributions to PACW’s urgent reliability needs should be considered in weighing the merits of submitted bids.

¹ For a discussion of concurrent procurement of bilateral contracts and an RFP subject to the competitive bidding rules, *see* Docket No. UM 2166, Order No. 21-320; Docket No. UM 2176, Order No. 21-328.

2. The Commission should direct PacifiCorp to undertake the procurement necessary to address reliability needs for PACW to meet 2028 WRAP compliance requirements and to achieve HB 2021's 2030 emissions target.
3. The Commission should affirmatively reject PacifiCorp's unilateral removal of B2H from the preferred portfolio, and direct PacifiCorp to continue efforts to bring B2H forward as a network resource for bundled customer needs. The Commission should require PacifiCorp to present evidence regarding its decision to remove B2H, including any correspondence with Bonneville Power Administration ("BPA") regarding the redirect study for the Longhorn substation, or any other rationale upon which PacifiCorp relies to remove B2H. In this proceeding, the Commission should require PacifiCorp to bring B2H back into its planning to analyze the benefits it would bring for Oregon customers under a modeling run that includes the resource. Eliminating B2H from network service carries major risks and costs for Oregon customers which will result in an unjust and unreasonable outcome when they come before the Commission. The decision to remove B2H must be fully and adequately analyzed in this process to ensure that the IRP results in the optimal blend of cost and risk for Oregon customers, as required by Oregon's statutes and IRP Guidelines.
4. The Commission should affirmatively reject PacifiCorp's proposed cost and resource allocation methodology and direct the development of a methodology which identifies the net cost of state policies while retaining the precedent that system reliability costs be allocated to all customers.

Despite PacifiCorp's recent inaction on its filed IRPs, RNW continues to engage seriously with PacifiCorp on the modeling and planning ecosystem underlying the IRP development process. RNW has pursued extensive engagement with PacifiCorp both in formal regulatory proceedings, in Public Input Meetings, and through informal direct engagement with their modeling teams. RNW appreciates PacifiCorp's transparency and willingness to discuss its modeling approach in depth. While RNW focuses these initial comments on urgent, near-term actions necessary to mitigate serious economic and reliability risks on the horizon, we feel it is important also to include in the record an itemization of the technical errors and concerns identified by the RNW team in their review of the 2025 IRP. While many of these errors are novel based on RNW's deeper review and greater access to PacifiCorp's modeling data, many also carry over from previous commentary on prior IRP submissions. These errors and the concerns they give rise to are discussed in Highly Confidential Attachment A to these comments.

II. PacifiCorp's Cost Allocation Framework Creates Stranded Capacity Risk Under WRAP Compliance Requirements

A. Introduction

In this section, RNW exposes two critical failures in PacifiCorp's 2025 IRP that, together, threaten to impose unfair costs on Oregon customers that have no basis in any Commission-approved cost allocation methodology. PacifiCorp's PLEXOS modeling framework contains a complicated and ambiguous new process for identifying reliability needs, relying primarily on the Western Resource Adequacy Program ("WRAP") accounting structure. PacifiCorp's implementation of this framework includes both state-specific WRAP requirements for Oregon and Washington as well as a Western constraint; while the state-specific requirements utilize the Multi-State Protocol and Washington Interim Joint Allocation Methodology ("MSP-WIJAM") without respecting transmission constraints, the Western constraint does reflect transmission constraints between PacifiCorp's eastern ("PACE") and western ("PACW") systems but fails to reflect jurisdictional allocations.

PacifiCorp's newly proposed jurisdictional modeling framework is intended to identify resource needs based on state-specific policy requirements relative to their allocation. However, the regional WRAP constraints incorporated into the jurisdictional model are reliability constraints, not state policy constraints, which the MSP-WIJAM has historically treated as system rather than situs resources. In conflating state policy and reliability requirements, the new approach departs from decades of precedent by treating reliability investments as jurisdiction-specific (situs-allocated) rather than shared system costs, presupposing the forthcoming cost allocation process by allocating the costs to fill PACW's reliability needs to PACW customers. This change would saddle Oregon and Washington with the full burden of resolving capacity imbalances caused by system-wide planning decisions under the pretense that these costs are state policy-driven, while the utility simultaneously abandons the Boardman-to-Hemingway transmission project that could help solve these very problems.

Further, the commingling of reliability accounting methods which take starkly differing approaches to the topology of the system - in one case including and in another excluding transmission constraints - risks further complications and negative impacts in a future allocation exercise which PacifiCorp could seek to base on this analytical framework. As an example, under the allocation-based accounting exercise, Oregon customers could be at risk of paying for over 1,000MW of firm capacity trapped behind insufficient transmission between PacifiCorp's PACE and PACW.

B. Historical Physical Imbalance Between PACE and PACW

PacifiCorp's portfolio has historically shown a large physical imbalance between PACE and PACW Balancing Areas. Figure 1 below displays the existing resources (net of transfers) and total obligations (including reserves) from the 2025 IRP's load and resource tables for both summer and winter seasons. These figures include existing resources only—proxy resources are excluded.

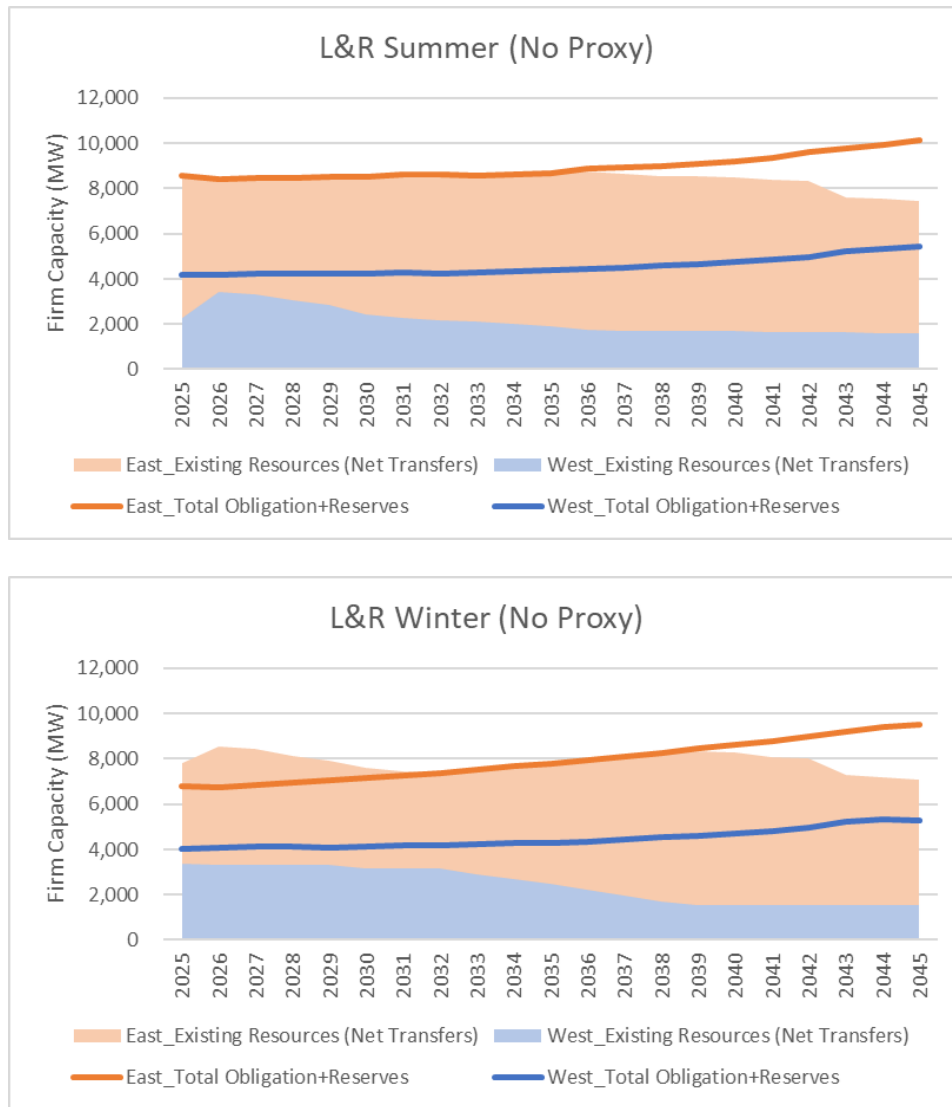


Figure 1: L&R Summer and Winter Balance²

² PacifiCorp, 2025 IRP Supporting Documents: 2025 IRP Workpapers - Part 1, (P)_Fig 6.2-6.7, Tbl 6.14-6.15, 9.12-15, 2025 IRP Final March - L&R, <https://www.pacifiCorp.com/energy/integrated-resource-plan/support.html>.

When assessed on a physical basis, PACW shows a large net open position in both summer and winter seasons. While PacifiCorp plans and dispatches its system on a system-wide basis, transfers between the two areas are constrained by three factors: the existing 1,600 MW east-to-west transfer capacity, the availability of excess capacity in PACE, and the size of the capacity need in PACW.³ Even after accounting for maximum feasible transfers, PACW still faces significant capacity shortfalls in both winter and summer seasons, as depicted in Figure 2.

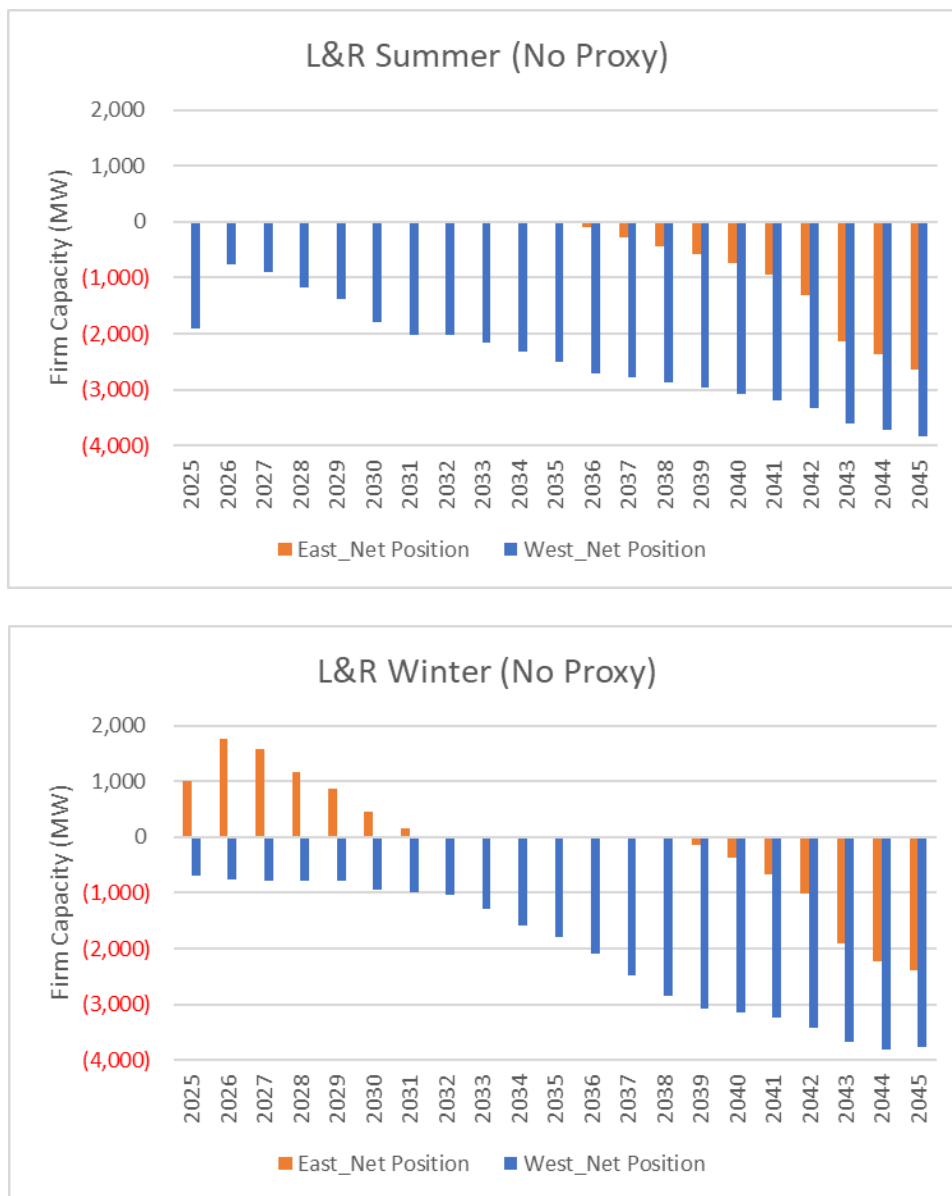


Figure 2: East and West Net Position (After Accounting for Transfers)

³ See PacifiCorp response to OPUC Data Request 95 in LC 85.

C. The Dual Reliability Constraints Both Lead to the Situs Allocation of Reliability Needs

While physical location of load and resources is critical for operations and PacifiCorp's WRAP showings⁴, it assumes a secondary position in PacifiCorp's IRP modeling due to the company's cost allocation framework. In the 2025 IRP, PacifiCorp uses the 2020 Multi-State Protocol ("MSP"), which was last updated in December 2019, to bundle all costs systemwide and distribute them to all ratepayers based on load-derived System Generation ("SG") factors.⁵ In doing so, the utility renders the geographic location of the resources irrelevant for purposes of resource (i.e., cost) allocation.

While this legacy approach is reasonable under the negotiated cost allocation framework in which the system is planned in an integrated fashion, it masks significant physical and regulatory constraints which must be more carefully considered in a transmission and resource planning construct. Without intervention, applying this analytical methodology to a future MSP - a rational concern given the jurisdictional modeling framework exists largely to inform what state-specific preferences drive which resource needs⁶ - could lead to serious cost concerns for Oregon customers.

To bookend this concerning scenario, RNW analyzed PacifiCorp's PLEXOS modeling inputs against the 1,600 MW east-to-west transmission constraint to identify the magnitude of stranded resources which could not support Oregon loads and for which Oregon would need to pay once directly under the legacy allocation framework for existing resources and a second time in the form of replacement resources on the western system. For our analysis, we allocated this transfer service using PacifiCorp's own assumptions for allocating PACW proxy resources: 75% to Oregon (1,200 MW) and 25% to Washington (400 MW).⁷

Figure 3 below illustrates the resulting problem. The graphs show both nameplate capacity (top) and firm capacity (bottom) for existing resources only—proxy resources are excluded. The orange bars represent Oregon's allocated eastern resources under MSP, while the black line indicates Oregon's 1,200 MW share of transmission capacity. The stark reality: Oregon is allocated significantly more PACE capacity than it can physically access due to constrained transfer capability on the underlying transmission network.

⁴ The specific application of WRAP's requirements to PacifiCorp, which has loads in two WRAP subregions, is complicated and is discussed below in Section II(E).

⁵ PacifiCorp's 2025 IRP at 39 (Mar. 31, 2025) (hereinafter "2025 IRP").

⁶ UE-230812. Comments of Renewable Northwest on PacifiCorp's Draft 2025 Integrated Resource Plan in UE - 230812. March 3, 2025

⁷ See PacifiCorp response to OPUC Data Request 154 in LC 85.

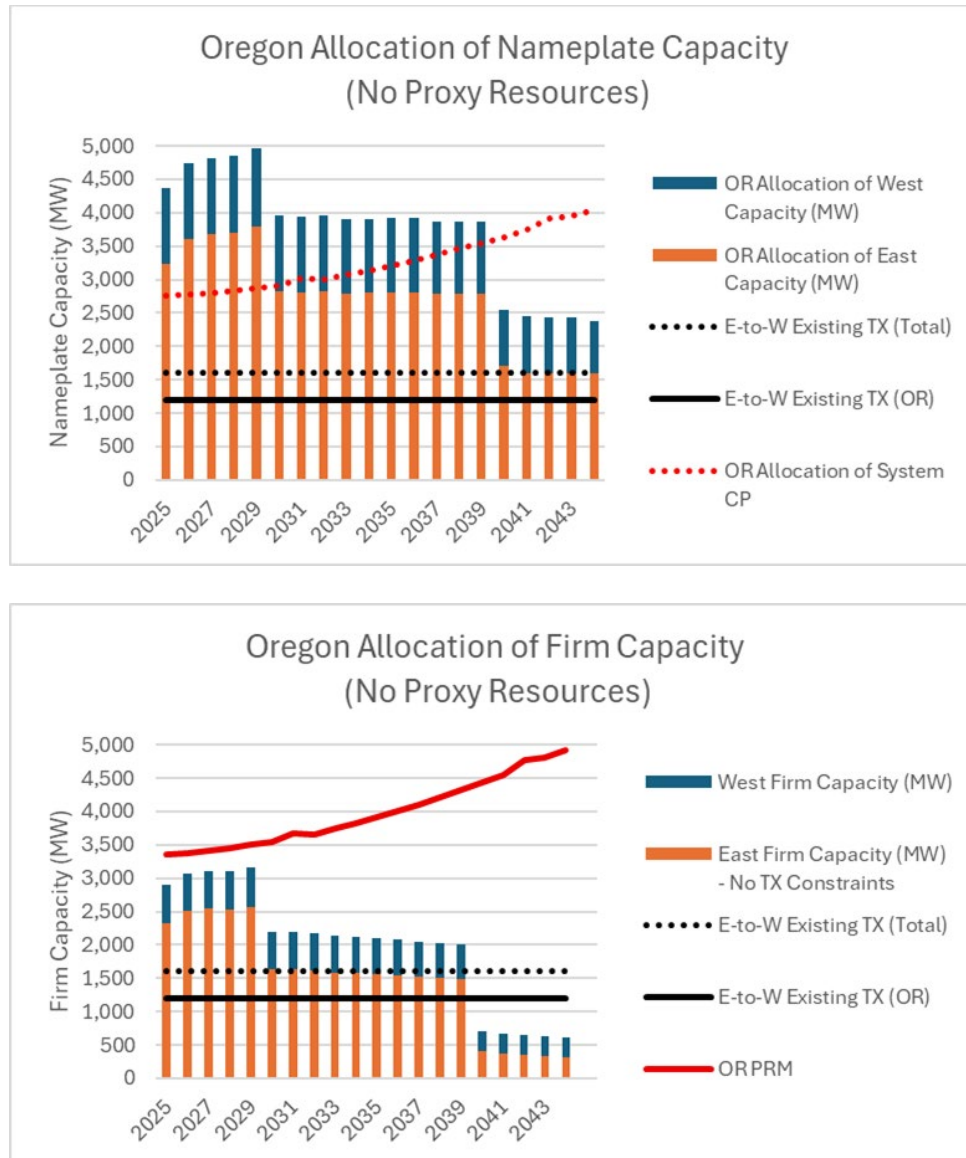


Figure 3: Oregon Allocation of Nameplate and Firm Capacity

This over-allocation, if left unaddressed, would create substantial stranded cost risk, which represents the difference between what Oregon is assigned (and pays for) through the MSP framework and what it can actually use after accounting for the physical limitations of PacifiCorp's transmission system. The amount of stranded cost risk is visually represented in the graphs by the extent to which the orange bars (Oregon's allocation of eastern resources) extend above the solid black line (Oregon's assumed transmission allocation). As shown in Figure 4, this deliverability risk is substantial through 2029 while Oregon still receives its full MSP allocation of coal resources, and persists through 2039. Even after SB 1547 removes coal from Oregon's portfolio, insufficient transmission remains to deliver all the PACE firm capacity

allocated to Oregon. The stranded capacity risk only subsides in 2040, after Oregon removes all natural gas-fired resources from its portfolio.

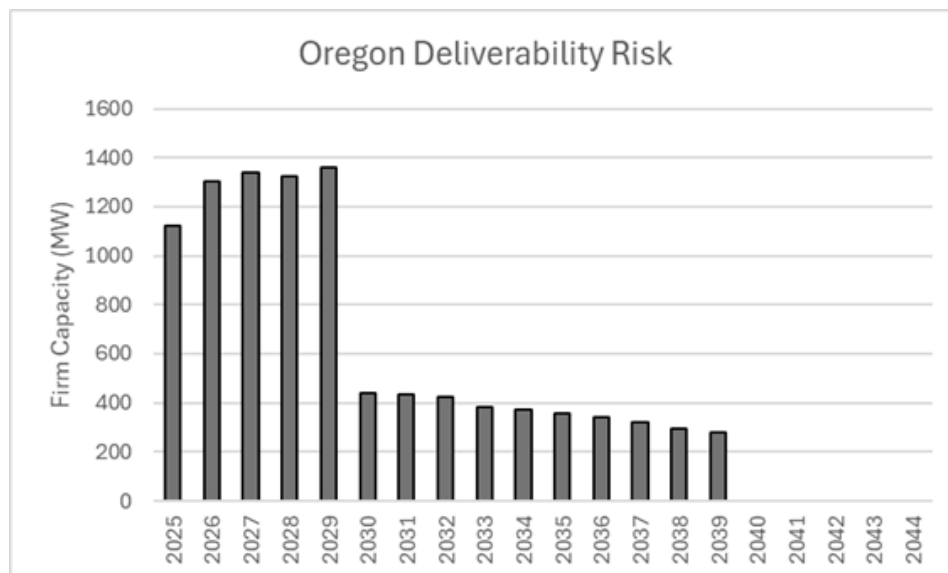


Figure 4: Resources Allocated to Oregon Incapable of Addressing Oregon Reliability Requirements

When implementing the WRAP jurisdictional constraints in PLEXOS, PacifiCorp fails to account for the critical east-to-west transmission limitation affecting Oregon's firm capacity obligations. PacifiCorp's "copper sheet" assumption for firm capacity assumes unlimited transmission and prevents the model from accurately reflecting Oregon's reliability constraints.. On its own, this assumption creates significant risk because the PLEXOS LT model underestimates the need for new reliability investments during the optimization process.

RNW recognizes PacifiCorp's effort to address this issue by implementing a separate WRAP West constraint that activates in parallel to the respective jurisdictional WRAP constraints for the Oregon and Washington portfolios.⁸ RNW generally views the WRAP West constraints as being more aligned with both WRAP requirements and physical reliability limits on the system, and would form a better basis for needs identification. However, the inclusion of these dual constraints in the state-specific jurisdictional runs would, as proposed, allocate these resources as situs obligations, departing from the historical resource sharing and cost allocation framework. Regardless of whether the Oregon or West constraint binds, PacifiCorp's proposed framework

⁸ PacifiCorp response to RNW Stakeholder Feedback Form (Feb. 10, 2025), https://www.pacifiCorp.com/content/dam/pcorp/documents/en/pacifiCorp/energy/integrated-resource-plan/2025-irp/2025-irp-comments/2025.062_RNW_2-10-2025_with_response.pdf.

would still allocate these system reliability resources to PACW customers, a significant departure from the historical resource sharing and cost allocation framework.

D. The Trigger: WRAP Subregional Requirements Expose the Issue

Based on RNW's interpretation of WRAP program rules, when forward showing requirements become binding in 2028, PACW's true reliability gap and resource allocation concerns transform from an abstract concern around cost and reliability to a concrete one. RNW views this as a reliability planning issue driven by legacy planning and procurement practices, not Oregon or Washington state energy policy. WRAP's compliance rules will likely require substantial new investments or merchant contracts that the IRP would allocate to Oregon.

This situation arose from the intersection of four factors:

- **Physical Imbalance Meets Transmission Limits:** PACW's large capacity deficit in concert with insufficient east-to-west transfer capability from the utility's current transmission network.
- **Firm Transmission Requirements:** WRAP mandates that participants secure firm transmission rights for at least 75% of forward resource showings in both summer and winter seasons⁹—transmission that simply doesn't exist for much of Oregon's allocated capacity.
- **Subregional Market Separation:** WRAP splits PacifiCorp's system across two distinct subregions: PACE: Southwest and East Diversity Exchange (SWEDE) and PACW: Mid-Columbia (MidC), as shown in Figure 5, which mirror the transmission-constrained regions of the PACE and PACW systems..
- **Balanced Subregional Showings:** WRAP requires utilities to demonstrate resources capable of being delivered to load. According to WRAP Business Practice Manuals 103 and 108, participant loads that cannot be served with a common set of resources "shall therefore be submitted in separate FS Demonstrations"—particularly when separated by constrained transmission paths.¹⁰ RNW understands this as requiring PacifiCorp to demonstrate PACW compliance separately from PACE and using only resources in or deliverable to PACW under the WRAP deliverability requirements.¹¹

⁹ Western Power Pool, *Western Resource Adequacy Program: 108 Forward Showing Submitting Process*, [https://www.westernpowerpool.org/private-media/documents/V1.0 BPM 108 FS Submittal Process CLEAN.pdf](https://www.westernpowerpool.org/private-media/documents/V1.0_BPM_108_FS_Submittal_Process_CLEAN.pdf) (hereinafter "WRAP BPM 108").

¹⁰ *Id.*; See also: Western Power Pool, *Western Resource Adequacy Program: 103 Participant Forward Showing Capacity Requirements*, [https://www.westernpowerpool.org/private-media/documents/V1.1 BPM 103 Forward Showing Capacity Requirements 1.pdf](https://www.westernpowerpool.org/private-media/documents/V1.1_BPM_103_Forward_Showing_Capacity_Requirements_1.pdf) (hereinafter "WRAP BPM 103").

¹¹ See also WRAP BPM 103 at 12 (Load Aggregation/Disaggregation); WRAP BPM 108 at 6-7 (FS Demonstration).

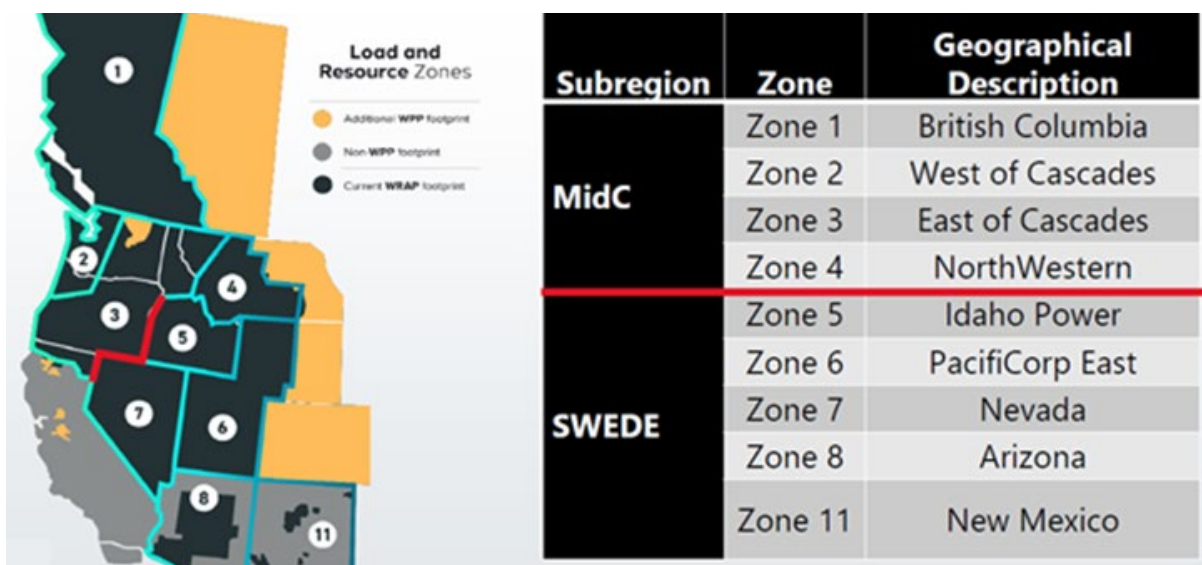


Figure 5: WRAP Subregions Map¹²

E. PacifiCorp’s Problematic Shift From Longstanding Cost Allocation Precedent is Deeply Embedded in IRP Jurisdictional Analysis

In the 2025 IRP, PacifiCorp proposes a radical departure from decades of precedent by arguing that reliability costs should be situs-allocated by jurisdiction rather than shared system-wide. If adopted, this shift would drastically change how ratepayers pay for this fundamental benefit from their service provider. In a planning context, it fundamentally changes how PacifiCorp plans to meet its system needs, without regulatory approval of the underlying change to its allocation strategy.

RNW conducted a detailed investigation of the company’s modeling setup on these critical constraints. **[Begin Highly Confidential]**

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[End Highly Confidential] While the IRP is not a cost allocation exercise, it is important to recognize that this deep-in-the-weeds technical assumption forms the basis for all of PacifiCorp’s subsequent IRP modeling, which utilizes the new jurisdictional framework, and which, without Commission intervention, is likely to form the basis for future cost allocation proposals coming from the utility.

¹² Western Power Pool, *Western Resource Adequacy Program: Review of preliminary, non-binding WRAP regional data for the current participating footprint for the Summer 2026 and advisory data for the Summer 2029 season* at 4, (Dec. 12, 2014), [https://www.westernpowerpool.org/private-media/documents/2024-12-12 Webinar Summer 2026 and 2029 Data final.pdf](https://www.westernpowerpool.org/private-media/documents/2024-12-12%20Webinar%20Summer%202026%20and%202029%20Data%20final.pdf).

This alternative approach proposed by PacifiCorp would unfairly assign Oregon ratepayers the full responsibility of resolving reliability shortfalls that stem from PacifiCorp's overall portfolio structure and transmission constraints, conflating energy and reliability costs historically allocated system-wide with policy-driven costs appropriately allocated situs. Oregon's reliability needs stem not from Oregon-specific policies or decisions, but rather the intersection of:

- A system-wide resource portfolio historically developed to serve all customers;
- Physical transmission constraints that limit access to resources customers have paid for;
- Regional reliability program requirements that require balanced regional showings and prohibit the use of Front Office Transactions ("FOTs") as an eligible resource.

PacifiCorp created this imbalanced system through decades of integrated planning. But now it seeks to lay the groundwork for Oregon to pay a disproportionate share of the costs to balance the system, at a time when capacity is scarce and the window for action is short. This violates years of integrated planning and cost allocation precedent as well as fundamental principles of cost causation and fair allocation. To be clear, RNW acknowledges that any premium costs associated with meeting state policies, such as HB 2021, should be allocated to the jurisdictions driving those requirements. However, basic system reliability is fundamentally different—it benefits all customers and should remain a shared system cost. Oregon customers have been paying for substantial firm capacity on both PACE and PACW for years and are expected to pay for years to come.

The problem is that PacifiCorp's modeling framework, as presented in the 2025 IRP, cannot distinguish between resources needed for reliability versus those needed for clean energy compliance, and instead functionally assesses all new resources as being driven by state policy within the IRP. Without a counterfactual analysis showing the least-cost resources needed solely for energy and reliability, exclusive of state policies (clean energy mandates, emissions constraints, or technology preferences), PacifiCorp cannot properly identify which costs should be allocated system-wide versus jurisdiction-specific.¹³ It is these baseline reliability costs that must be shared across all customers who benefit from a reliable system.

These longstanding issues are now manifesting in PacifiCorp's 2025 Request for Proposals ("RFP") in Oregon, which seeks resources that the company would like to presumptively assign to Oregon without demonstrating which resources are needed purely for compliance with HB 2021 – and therefore appropriately assigned to Oregon – as opposed to those required for system reliability, which should be shared across its six-state footprint. West-side reliability risk is not a result of Oregon's clean energy policies. Rather than acknowledging that this risk has been a

¹³ RNW understands that development of counterfactual scenario analysis for purposes of HB 2021's cost cap is a matter currently under discussion in Docket No. UM 2273. However, because HB 2021's cost cap is limited to Sections 1-15 of the law, that counterfactual analysis likely will not account for all resources that are responsive to Oregon state policy.

feature of the company's system for decades, with the bill now coming due for overreliance on uncontracted resources for PACW needs, PacifiCorp seeks to assign the full cost of filling the reliability gap to Oregon customers as though it is exclusively driven by HB 2021. The Commission should reject this proposal. Oregon customers should strictly be responsible for the incremental cost of policy-constrained solutions relative to unconstrained solutions, fairly allocating the costs for reliability benefits from these resources across the system. Such an approach aligns with the terms of the 2020 MSP Protocol and cannot be changed in an IRP. The IRP is fundamentally an economic model; to the extent that model deviates from the cost-allocation principles that will apply in the real world, its results are not valid.

Conversely, PacifiCorp excludes potential cost-effective and policy-eligible clean energy resources from PACE from supporting Oregon's binding HB 2021 requirements, through its proposal to require a deliverability constraint. While PacifiCorp should consider deliverability in the context of a holistic evaluation of the economic and reliability contributions of the bids it receives, there is no clear statutory or regulatory requirement that the clean energy resources must be deliverable to Oregon load to contribute to HB 2021 needs.¹⁴ As a parallel framework, assigning clean energy generation to Oregon customers from PACE may be an optimal resource investment for the system - and while Oregon customers would reasonably be assigned a share of incremental costs associated with the clean energy premium, it would be unreasonable, as proposed, to assign the full costs to Oregon customers while, in effect, granting the reliability contributions of the resource to PACE customers for free.

F. The Impact of Boardman-to-Hemingway

The Boardman-to-Hemingway transmission line would directly address, albeit partially, Oregon's capacity and reliability concerns. Originally scheduled for commercial operation in 2027, B2H would add roughly 800 MW to PacifiCorp's existing 1,600 MW east-to-west transfer capability—a 50% increase that arrives just as WRAP requirements become binding in 2028.

The benefits afforded by B2H to PACW ratepayers are substantial. Assuming a similar situs allocation assumption from above, assigning 75% share of B2H to Oregon would provide an additional 600 MW of scheduling rights for firm capacity that the state could fully utilize for its respective WRAP obligations. This saves 600 MW of firm capacity from being stranded through 2029 and at least 300 MW saved through 2039. Based on the 2022 proposed WRAP Cost of New Entry ("CONE") value of \$91.81/kW-year, this reflects a potential savings of over \$55 million per year in capacity costs alone, or \$110 million per year if the full summer seasonal CONE

¹⁴ *In re PacifiCorp Application for Partial Waiver of OAR Chapter 860-089, Request to Engage Independent Evaluator, and Approval of 2025 Draft RFP*, Docket No. UM 2383, PacifiCorp's Reply Comments at 1-2, 10-12 (July 24, 2025) (PacifiCorp agreed to remove the deliverability requirement. At the time of this filing, RNW is in the process of reviewing PacifiCorp's comments), available at: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAC&FileName=um2383hac338513035.pdf&DocketID=24530&numSequence=35>.

adder is applied¹⁵. This excludes the energy (i.e., flow-based) benefits as well, which would allow for additional opportunities for cost-effective PACE resources to serve Oregon's clean energy needs.

Beyond reducing stranded capacity, B2H would enable PLEXOS to select proxy resources in PACE for both reliability and Oregon's HB 2021 decarbonization targets. As Figure 6 demonstrates, the additional 600 MW of east-to-west transmission service provided by B2H would increase the total available transfer capability up to 1,400 MW by 2040.

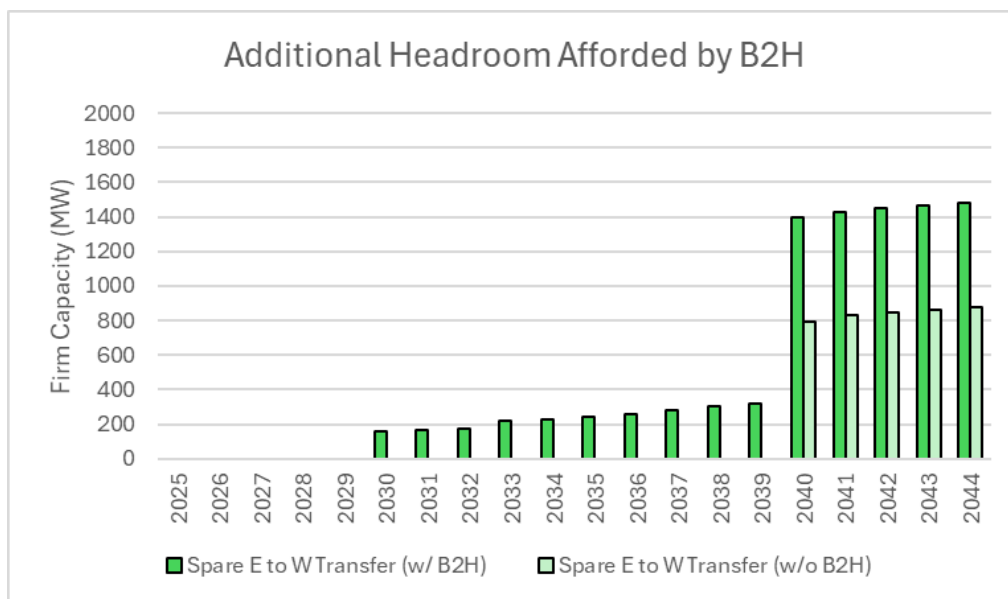


Figure 6: Additional Headroom Afforded by B2H

PacifiCorp’s treatment of B2H reveals deeply troubling contradictions. In April 2024, the company filed its 2023 IRP Update identifying B2H as a Designated Network Resource (DNR) that would provide immediate benefits to PACW customers.¹⁶ Even as recent as February 28, 2025, PacifiCorp reaffirmed this commitment on B2H in its Annual Progress Report to WECC, stating B2H has “a planned in-service date of Q4 2027” and will “provide load service to Oregon customers and provide additional transfer capacity between PacifiCorp East (PACE) and PacifiCorp West (PACW).”¹⁷ Yet just one month later, the company abruptly shifted course on

¹⁵ Western Power Pool, *Western Resource Adequacy Program: CONE Penalty Task Force - Proposal*, https://www.westernpowerpool.org/private-media/documents/2022-02-10_CONE_Penalty_Proposal.pdf.

¹⁶ *In re PacifiCorp 2023 IRP*, Docket No. LC 82, PacifiCorp’s 2023 IRP Update at 35 (Apr. 1, 2024), available at: <https://edocs.puc.state.or.us/efdocs/HAD/lc82had327670023.pdf> (hereinafter “2023 IRP”).

¹⁷ *PacifiCorp 2025 Annual Progress Report to WECC*, (Feb. 28, 2025), <https://www.wecc.org/wecc-document/19601>.

B2H when it filed its 2025 IRP on March 31, 2025 and stated that it is excluding the line from the preferred portfolio.

The contradiction deepens when examining PacifiCorp's treatment of the B2H line in PLEXOS.

[Begin Highly Confidential]

[End Highly Confidential] PacifiCorp has not provided any justification to RNW for this model setting.

The removal of B2H for PACW customers could not be worse. B2H would come online precisely when Oregon needs it most: as WRAP requirements expose the stranded capacity problem in 2028. Instead of embracing this solution, PacifiCorp abandons it without adequate justification, leaving Oregon customers to bear the consequences.

G. Concerns

Based on the analysis we outline above, RNW has multiple concerns with PacifiCorp's handling of WRAP-related constraints and the treatment around B2H. These issues collectively threaten to impose billions in excess costs on Oregon ratepayers while failing to ensure reliable service. Our concerns are as follows:

- **Unfair Cost Allocation:** The model assigns all new reliability builds to HB 2021 or regional policies rather than system reliability, forcing PACW ratepayers to shoulder costs that should be shared system-wide.
- **Unjustified B2H Exclusion:** PacifiCorp's eleventh-hour removal of B2H lacks transparency and adequate justification, particularly given the project's clear benefits for Oregon ratepayers and the timing of WRAP compliance.
- **Absent Counterfactual Analysis:** Without a baseline scenario showing least-cost resources needed purely for reliability (independent of clean energy policies), PacifiCorp cannot properly distinguish between system reliability costs and clean energy premiums—making fair cost allocation impossible.

H. Recommendations

Based on our analysis, RNW respectfully recommends the Commission direct PacifiCorp to:

- **Develop Framework to Assess Net Costs of State Policy Requirements:** In order to fairly and consistently allocate resources under an accurate cost-causation basis, PacifiCorp first needs to provide the Commission with a framework that separates system reliability needs from clean energy requirements. This will help to ensure that all

ratepayers share equally in system reliability costs while only bearing responsibility in any premium driven by state energy policies.

- **Model WRAP Compliance Costs System-Wide:** Return to the historical practice of treating reliability-related costs as system costs rather than situs allocating them by jurisdiction.
- **Assign Only Clean Energy Premium to Oregon in the Model:** Oregon ratepayers should only be assigned the premium for filling their pro rata share of system reliability with clean energy, not the full cost of reliability resources.
- **Conduct Full B2H Investigation:** Given the clear benefits B2H provides to Oregon ratepayers in reducing stranded costs and expanding resource options, OPUC should conduct a full investigation into PacifiCorp's decision to exclude it from the preferred portfolio.

III. PacifiCorp Has Not Sufficiently Justified the Removal of the Boardman to Hemingway transmission line

A. The Commission Should Reject PacifiCorp's Removal of B2H as a System Resource

In the previous section, we discuss the impact of removing B2H from the preferred portfolio. Here, we describe the Company's failure to transparently communicate with stakeholders and the Commission about the transmission line's removal, demonstrate that the Company has not adequately justified their decision, and urge the Commission to reject B2H's removal.

For a transmission line that has been in development for nearly 20 years and listed as an action item in PacifiCorp's IRP since 2013, the Company's explanation for its removal is woefully insufficient. It boils down to two sentences in a 888-page document: "Currently, the Boardman-to-Hemingway transmission line (B2H) is not included in the preferred portfolio. PacifiCorp is reevaluating the timing and needs analysis underlying B2H because of factors such as changed native load growth and a lack of capacity available on neighboring transmission systems to deliver to load pockets."¹⁸

Since the IRP's publication, PacifiCorp has done little to clarify the rationale for its proposed removal of B2H, though a hazy picture has emerged. In response to a question RNW submitted via stakeholder feedback form, PacifiCorp stated that: "[I]n previous IRP cycles, B2H would facilitate existing load growth via a redirect of existing transmission rights on Bonneville Power Administration's (BPA) system. PacifiCorp has not been successful in getting this redirect of

¹⁸ 2025 IRP at 5.

transmission rights granted by BPA.”¹⁹ When Chair Tawney questioned PacifiCorp on the line’s removal at an OPUC public meeting, Senior VP of Resource Planning and Procurement, Rick Link, provided a similar explanation. Essentially, the Company needed to redirect existing transmission rights on BPA’s system to move power from the terminus of B2H to load centers on the west side of their system. However, when PacifiCorp learned that BPA could not grant the redirect request without studying it - the timing of which is uncertain - the business case for B2H suddenly fell apart. Mr. Link further explained that the Company is in talks with a single large customer to figure out an arrangement that would allow B2H to serve their facilities, instead of being treated as a system resource.²⁰

PacifiCorp’s reasoning appears inconsistent. On the one hand, the Company argues that the viability of the transmission line hinges on the ability to transfer power to loads in Central Oregon. On the other hand, it acknowledges that its request to redirect that power has not been denied. In response to a Sierra Club data request, PacifiCorp even confirmed that “BPA has never communicated that they would not complete the necessary studies.”²¹ Further, according to the B2H Term Sheet, BPA has always intended to evaluate the redirect request - suggesting that the status of the request is essentially unchanged.²²

In a response to an OPUC data request, PacifiCorp disclosed that BPA notified them in the fall of 2022 of the need to evaluate the redirect request through a cluster study - an event PacifiCorp suggests precipitated the removal of the B2H from the 2025 IRP. However, Pacificorp did not provide any documentation of this exchange. Moreover, several months later in March of 2023, BPA committed to executing contracts with PacifiCorp to facilitate the redirect of its existing transmission rights.²³ And, following these exchanges in 2022 and 2023, PacifiCorp continued

¹⁹ PacifiCorp Response to RNW Stakeholder Feedback Form, (submitted Feb. 6, 2025) https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025-irp-comments/2025.060_RNW_2-6-2025_with_response.pdf.

²⁰ April 15, 2025 OPUC Public Meeting, starting at 1:07:00, available at https://oregonpuc.granicus.com/player/clip/1484?view_id=2&redirect=true.

²¹ See Docket No. UM 2383, PacifiCorp’s Response to Sierra Club Data Request 2b (“BPA has never communicated that they would not complete the necessary studies. The redirect requests that were submitted by PacifiCorp continue to remain in ‘study’ status, and it is not known when these studies will be completed.”).

²² B2H Term Sheet at 3 (“As part of the PTP service evaluation, PAC and BPA will also explore options to combine an offer of PTP service with the modification to points of receipt and points of delivery in PAC’s existing PTP service tables (“redirect”) within the Long Term Firm Point-to-Point Service Agreement (No. 04TX-11722) between PAC and BPA, subject to BPA’s Tariff and related business practices including available transfer capability (“ATC”), with a goal to optimize PAC’s transmission service over the Federal transmission system to serve its central Oregon loads (e.g., using a single wheel from a network point of receipt to PAC’s load at Ponderosa 230 or Pilot Butte 230). BPA will apply its long-standing practice to evaluate the ATC impacts of the new PTP service against the ATC impacts of existing service, to include the bidirectional scheduling rights and redirected service.”), available at: <https://boardman2hemingway.blob.core.windows.net/media/Default/documents/B2H%20-%20Term%20Sheet%20-%20BPA%20PAC%20IPC%20Signed-IP.pdf>.

²³ BPA, *Closeout Letter with Final Decision for B2H with Transfer Service*, Attachment A at 7 (Mar. 23, 2023) (“BPA will also execute PTP agreements with PacifiCorp reflecting the redirect of existing transmission service

touting B2H as a key element of its plans as recently as late February 2025, as discussed above in Section II(G).

Effectively, PacifiCorp is blaming BPA for its own retreat from B2H while providing no documentation suggesting that BPA cannot complete the studies on time. In reality, there seems to be little if any change from previous planning cycles. B2H could not deliver to west side loads in prior planning cycles either, since BPA was always planning to evaluate PacifiCorp's redirect request pursuant to the B2H Term sheet.²⁴

PacifiCorp's removal of B2H as a system resource is premature. B2H is not expected to be in service until the end of 2027, which leaves PacifiCorp two and half years to receive the redirect it requested. If the redirect has always been essential to PacifiCorp's business case for B2H, one would expect the Company to have documented this more thoroughly in past IRPs, raised it as a potential concern to the Commission and stakeholders, and actively engaged with BPA to resolve the matter.²⁵ Unless and until PacifiCorp provides documentation explicitly stating that BPA cannot complete the redirect request by the time B2H is energized, the decision to remove the line remains unwarranted.

Given that PacifiCorp has not adequately justified its removal of B2H, RNW recommends that the Commission take the following actions:

- Affirmatively reject PacifiCorp's unilateral removal of B2H from the preferred portfolio, and direct PacifiCorp to continue efforts to bring B2H forward as a network resource for bundled customer needs.
- Direct PacifiCorp to immediately engage with BPA regarding the status of its redirect requests, provide regular updates to the Commission and stakeholders on these conversations, and take all necessary steps to secure the redirect of its existing transmission rights.

These actions are essential to protect Oregon customers from the costly and risky strategy that PacifiCorp is currently pursuing - one that effectively isolates its two balancing areas and prevents future east side resources from serving Oregon load.

paired with the conversion to OATT service of PacifiCorp's legacy scheduling rights in central Oregon.”)
<https://www.bpa.gov/-/media/Aep/projects/southeast-idaho-load-service/b2h-closeout-letter-with-final-decision.pdf>.

²⁴ B2H Term Sheet at 3.

²⁵ According to PacifiCorp's Response to OPUC Data Request 52, BPA notified PacifiCorp in the fall of 2022 that BPA would need to study its redirect request in a cluster study process. In RNW's 5th Data Request to PacifiCorp, we asked whether “PacifiCorp communicate[d] this with the Oregon PUC at the time, or in any of the intervening time between fall 2022 and the publication of the 2025 IRP?” PacifiCorp's response was simply: “No.”

B. Additional analysis is necessary if PacifiCorp plans to pursue any future removal of B2H as a system resource

In prior IRPs, PacifiCorp conducted scenario analysis with and without B2H to compare portfolio builds and costs under these divergent futures. For example, in the 2023 IRP, PacifiCorp found that a portfolio without B2H was \$1.5 billion more expensive than the preferred portfolio, and that Oregon required a significantly larger resource buildout without the ability to access incremental resources additions from PACE.²⁶ Such counterfactual analysis is entirely absent from the 2025 IRP, making it impossible for stakeholders to fully understand the cost, reliability, and emissions impacts of PacifiCorp's removal of B2H.

PacifiCorp's treatment of B2H in a planning context is already having real world impacts. As previously discussed, the Company proposed a new deliverability requirement in its draft Oregon RFP, while removing the very transmission line that would facilitate delivery from PACE to PACW. Without B2H it will likely be far more expensive for PacifiCorp, and ultimately its Oregon customers, to reach compliance with HB 2021's emission reduction targets.

The importance of B2H in reducing system costs, connecting PacifiCorp's balancing areas, and meeting clean energy targets underscores the need for Commission action. A decision to remove B2H must be fully and adequately analyzed to ensure that the IRP results in the optimal blend of cost and risk for Oregon customers, as required by Oregon's statutes and IRP Guidelines. In addition to the recommendations outlined above, RNW also urges the Commission to take the following actions:

- Direct PacifiCorp to provide a detailed analysis that quantifies the impacts of removing B2H from the preferred portfolio from a cost, reliability, and emissions perspective. The Commission may require the Company to conduct this analysis in the current docket or, alternatively, initiate a new proceeding to investigate the removal of B2H.

IV. The Commission Should Direct Immediate Action to Address Unacceptable Cost and Reliability Risks Resulting from PacifiCorp's Insufficient and Delayed Procurement Action

Renewable Northwest remains deeply concerned with PacifiCorp's continued inaction on the significant resource needs of its customers, particularly the acute needs of the Western system articulated in Sections II and III. While the resource imbalance between the PACE and PACW systems and corresponding PACW deficiency has been documented extensively over multiple

²⁶ 2023 IRP at 291.

planning cycles²⁷, almost no new resources have been contracted to address the acute reliability needs of the western system. In contrast to the handful of small-scale resources being developed in PACW, PacifiCorp has brought forward contracts for over a gigawatt each of solar and storage resources located in PACE supported by needs identified in the 2023 IRP²⁸ as well as the bilateral storage projects added since the 2023 IRP Update.²⁹ Regrettably, the only material update on reliability actions for PACW in the 2025 IRP appears to be regress – the proposed elimination of the B2H transmission project discussed in Section III.

In addition to creating material reliability risk for the western system, PacifiCorp’s inaction in planning and procuring for Oregon customer needs has, in the wake of recent federal policy changes, missed the opportunity to achieve billions of dollars in customer savings in tax credits for much-needed solar and wind resources.

In this section, RNW identifies the significant risk exposure now facing PacifiCorp’s customers, especially customers on the western system. These include reliability risks, spanning both physical reliability concerns and the financial impacts of policy non-compliance, as well as environmental concerns driven by PacifiCorp’s continual failure to make progress toward its clean energy policy requirements in Oregon and other western states.³⁰ We conclude this section with an analysis of the incremental costs now facing PacifiCorp customers resulting from the sunset of the Inflation Reduction Act (“IRA”) tax credits, and recommend a pathway to contract for projects within the narrowing window available to safe harbor solar and wind projects.

A. Inaction on Reliability Resource Needs Risks Both Rotating Outages and Financial Penalties

PacifiCorp has identified reliance on market purchases as a significant risk across multiple IRP cycles. In the 2021 IRP, PacifiCorp reduced assumed market purchase availability, noting the increased risk of reliance on import resources as market dynamics evolve following the 2020 western reliability events³¹. By the time of the 2023 IRP filing in March 2023, the Federal Energy Regulatory Committee (“FERC”) had approved a WRAP tariff prohibiting the use of

²⁷ *In re PacifiCorp 2021 IRP*, PacifiCorp’s 2021 IRP at 154-161 (Sept. 1, 2021), available at: <https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2021-irp/Volume%201%20-%209.15.2021%20Final.pdf> (hereinafter “2021 IRP”); 2023 IRP at 165-172.

²⁸ 2025 IRP at 77, Table 3.6.

²⁹ 2025 IRP at 19-20, 122.

³⁰ See Docket No. LC 82, Order 24-297 at 1 (Aug. 8, 2024) (the Commission found that PacifiCorp’s 2023 CEP had not demonstrated continual progress towards HB 2021’s emission reduction targets), available at: <https://apps.puc.state.or.us/orders/2024ords/24-297.pdf>.

³¹ 2021 IRP at 115.

non-resource specific FOTs for WRAP compliance, adding further risk to PacifiCorp’s short position on the western system.

Regardless of this long-documented deficiency and need for action, RNW is not aware of any new or contracted utility-scale resources for PACW since the 2023 IRP. While PacifiCorp has included new-build clean energy and storage resources in the 2023 and 2025 IRPs, these appear to be almost exclusively located in PACE with the exception of a handful of very small projects located in PACW. PacifiCorp’s Oregon and Washington solicitations seek commercial online dates of December 31, 2029³², too late to close the significant gap necessary to achieve reliability compliance for PACW. PacifiCorp needs to be on a more aggressive schedule to close what RNW believes to be its deficient PACW WRAP position, much of which will need to be filled by new resources as the market for short-term contracts (and associated firm transmission) is likely to be very limited.

As discussed in Section II, PacifiCorp’s reliability deficiencies have major implications for both the operational reliability of the western Balancing Authority (“BA”) as well as PacifiCorp’s compliance with the forthcoming requirements of the WRAP. In turn, these risks translate into significant risks for Oregon – in the form of possible rotating outages that could be both economically costly and directly harmful to vulnerable individuals – and PacifiCorp’s broader portfolio – in the form of possible deficiency payments to remain in good standing within the WRAP program, which, as discussed in Section II, PacifiCorp appears poised to propose for situs allocation to Oregon customers.

B. Inaction on Clean Energy Fails State Policy Objectives While Amplifying Reliability and Economic Risk

Following the disappointing termination of the 2022 RFP last year, RNW held some hope that PacifiCorp would return in the 2025 IRP with a renewed vigor toward meeting its clean energy targets in Oregon and Washington with a new RFP. Instead, PacifiCorp’s 2025 IRP appears to further dampen its clean energy ambitions, as seen in Figure 7, pushing planned solar and wind resources even further out than the delays of the 2023 IRP Update.

In light of the early sunset of IRA tax credits, this delayed procurement timeline could cost ratepayers up to \$3.6 billion in lost tax credits. While PacifiCorp’s 2023 IRP included plans to procure 4,476 MW of solar and 2,231 MW wind by 2027, it has contracted for only 300 MW of solar and 0 MW of wind. These solar and wind resources remain needed for both clean energy and reliability requirements. HB 2021 establishes a significant procurement need for clean energy to achieve ramping decarbonization targets for PacifiCorp, beginning with an 80%

³² Schedules for Oregon and Washington Situs RFPs: <https://www.pacificorp.com/suppliers/rfps/2025-oregon-situs-rfp.html>; <https://www.pacificorp.com/suppliers/rfps/2025-washington-situs-rfp.html>.

reduction by 2030 relative to the 2010-2012 baseline. PacifiCorp’s 2025 IRP identifies 3,450 MW of new solar and wind resources and 2,716 MW of storage resources by 2030. Looking strictly at PacifiCorp’s 2023 IRP plans for 2027, resources which would almost certainly have made sufficient progress now to capture the expiring federal tax credits, would translate into \$2.2 billion in missed savings for solar resources and \$1.4 billion in missed savings for wind resources, totaling \$3.6 billion across the portfolio³³. RNW appreciates the limited progress PacifiCorp has made toward achieving these needs, but is seriously concerned that the slow pace of clean energy procurement has risked billions in potential tax savings and may risk compliance as we rapidly approach 2030.

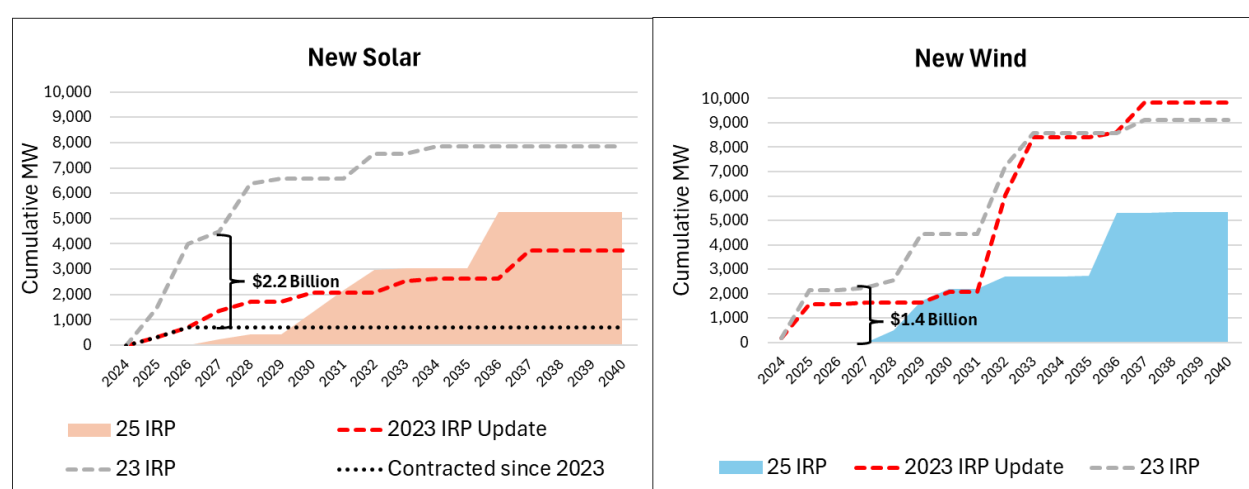


Figure 7: Tax Incentives at Risk Based on Inaction Following 2023 IRP³⁴

While the specific needs identified differ between the IRP and recently published 2025 Clean Energy Plan (“CEP”), the general direction and magnitude of the conclusion is likely to be similar. While RNW looks forward to deeper review and discussion of these issues in our second round of comments on both the IRP and the CEP³⁵, the significantly different resource mix conclusions between the two parallel analyses raises some concern.

Specifically, while the IRP and CEP align directionally on need, perplexingly, these parallel analyses arrive at starkly different conclusions on the portfolio makeup of the resources needed

³³Potential savings are estimated using the Production Tax Credit values from 2025 IRP Table 7.10 and capacity factors from (P)_ST Cost Summary -251.LP.ST.r21.Base.MN.2409MR.Integrated.155766 (LT. 155766 - 175096) v105.9.xlsb

³⁴ PacifiCorp, 2025 IRP Supporting Documents: 2025 IRP Workpapers - Part 1, (P)_Fig 1.3-1.7, 9.2-9.5, 9.7, 9.9 - Resource Capacity by Type 25IRP vs recent IRPs.xlsx, <https://www.pacificorp.com/energy/integrated-resource-plan/support.html>.

³⁵ See PacifiCorp’s 2025 Clean Energy Plan (CEP) (June 30, 2025), available at: <https://edocs.puc.state.or.us/efdocs/HAQ/lc85haq337820115.pdf> (hereinafter “2025 CEP”).

through 2030³⁶, with the IRP emphasizing solar resource development and the CEP emphasizing wind resource development. While solar and wind have comparable capacity factors, they have markedly different production attributes. Given the acuteness of PacifiCorp’s reliability needs, which reflect their own unique hourly and seasonal needs, it is unclear how these two resources could so meaningfully shift between analyses. These contrasting results raise concerns that there are material limitations within PacifiCorp’s model that fail to assess the unique production profiles of the resources and capture their interactivities with the unique reliability dynamics of the system in a meaningful way. This concern is discussed further in Highly Confidential Attachment A.

C. PacifiCorp Must Act Urgently to Realize Expiring Federal Tax Credits

Since the filing of the 2023 IRP, PacifiCorp has largely delayed action on procurement, citing its own financial uncertainty as a rationale for inaction.³⁷ In parallel, the window for realizing billions of dollars in federal tax credits is closing - but not yet closed. With the passage of House Resolution 1 (“HR 1”), the Investment Tax Credit (“ITC”) and Production Tax Credit (“PTC”) will sunset in coming years, with project eligibility limited to those achieving safe harbor status by July 4, 2026 or entering service by December 31, 2027.

PacifiCorp has a very narrow window to execute contracts which could capture hundreds of millions or billions of dollars in ratepayer savings for projects identified as necessary for Oregon customers. Based on RNW’s analysis, capturing the ITC or PTC benefits of solar and wind projects would carry \$400-650 million in savings per gigawatt of eligible solar and wind procurement. To take advantage of this opportunity, PacifiCorp could follow something akin to the process Portland General Electric (“PGE”) followed in 2021 when it paired its 2021 All-Source RFP with a search for bilateral capacity contracts.³⁸ Here, PacifiCorp should pair its ongoing 2025 RFPs with an open call for ITC- and PTC-eligible resources.

³⁶ 2025 CEP at 74

³⁷ See PacifiCorp’s 2023 IRP Update at 67, available at: https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023_IRP_Update.pdf; see also OPUC Special Public Meeting, May 30, 2024, starting at 1:33:00, available at https://oregonpuc.granicus.com/player/clip/1332?view_id=2&redirect=true.

³⁸ See Docket No. UM 2166, Order No. 21-320, Appendix A at 14 (Oct. 6, 2021) (discussing PGE’s concurrent pursuit of a bilateral power purchase agreement and an RFP subject to the competitive bidding rules); Docket No. UM 2176, Order No. 21-328 (Oct. 6, 2021) (approving a waiver of the competitive bidding rules for a power purchase agreement resulting from bilateral negotiations).

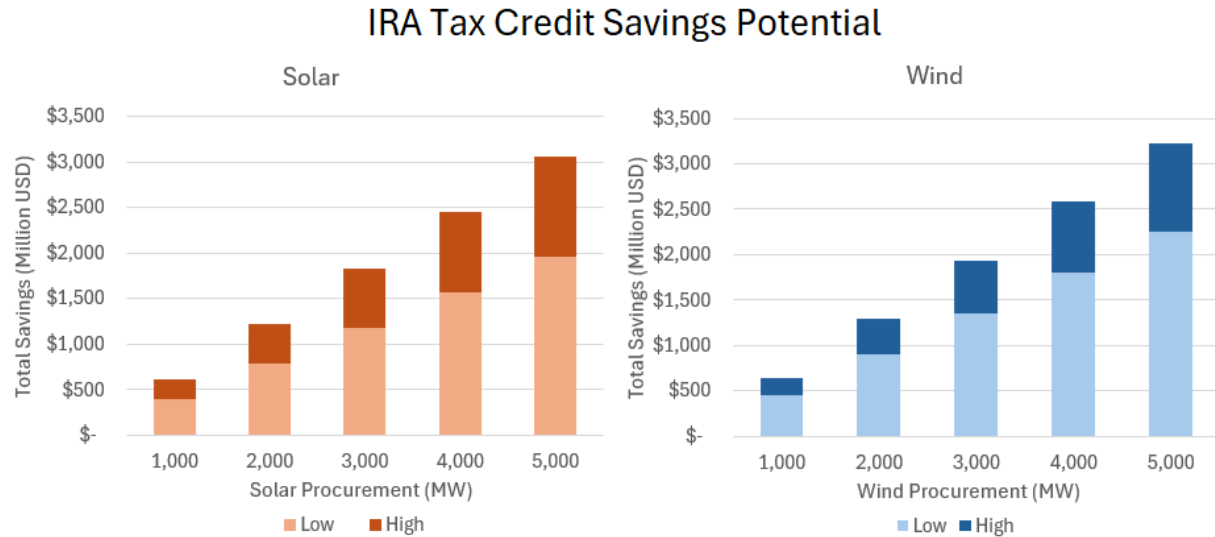


Figure 8: Potential Savings per Gigawatt of Solar and Wind Procured within IRA Window

While the timeline is tight, capturing tax credits for some projects is likely feasible - and would provide considerable benefits to PacifiCorp customers. PacifiCorp should proactively engage with developers of uncontracted projects from the 2022 RFP for bilateral contracts which should be executed as soon as possible to put these projects on the best foot forward to capture these tax incentives. While RNW does not have insights into what potential projects remain from the 2022 RFP, our review of PacifiCorp’s queue indicates substantial capacity in progress, including 14,995 MW of solar and 2,410 MW of wind with requested Commercial Online Dates (“COD”) between 2026 and 2028³⁹.

³⁹ According to PacifiCorp Generation Interconnect Request data found at OATI OASIS (accessed July 21, 2025), available at: <https://www.oasis.oati.com/ppw/index.html/>.

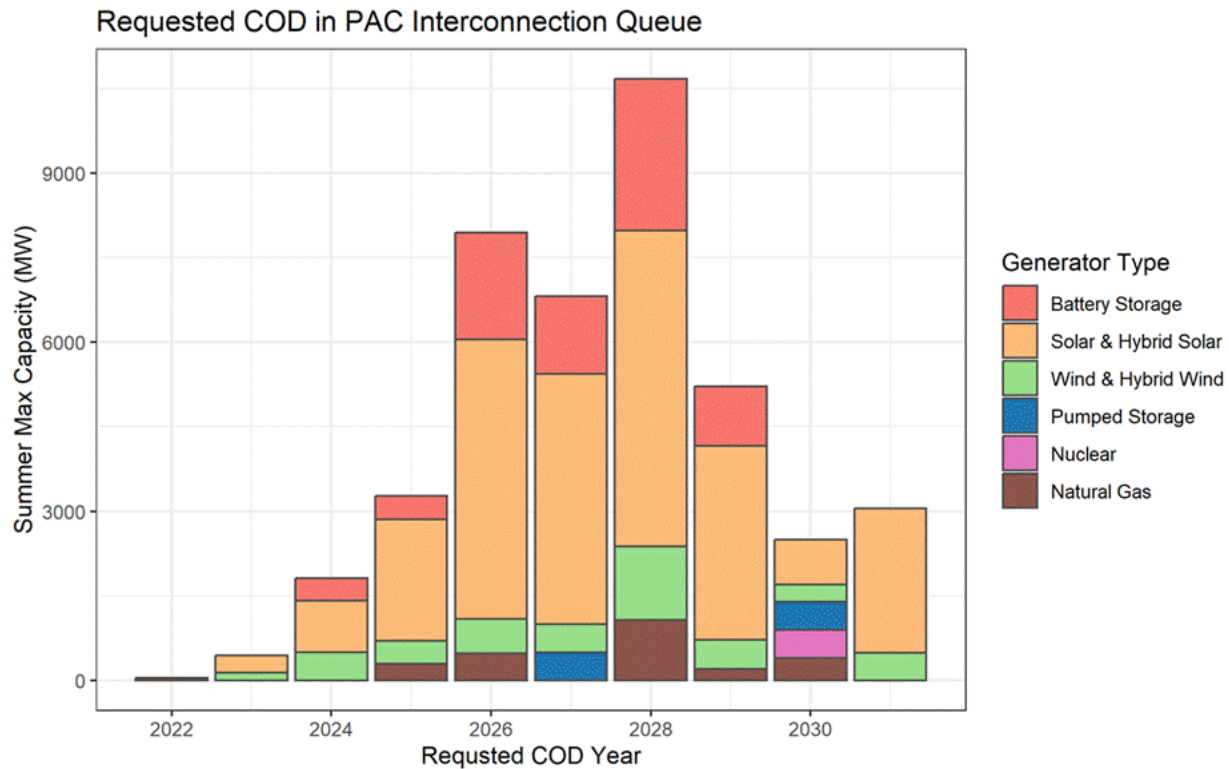


Figure 9: PacifiCorp Interconnection Queue Project Timelines

Currently, 9,393 MW of solar resources indicate requested CODs in 2026 and 2027 and may be viable for tax credit eligibility. Based on the 2025 IRP, PacifiCorp has no existing contract with any of these resources⁴⁰. If PacifiCorp could contract with even a third of the remaining solar resources and meet the HR 1 eligibility requirements, it could capture approximately \$1.7 billion⁴¹ in savings for its ratepayers, a significant share of which would be allocated to Oregon customers.

For the reasons detailed above, RNW urges PacifiCorp to issue an open call for resources across its six state footprint in order to capture the benefits of the ITC and PTC before they expire. PacifiCorp’s demonstrated resource needs, exacerbated by the cancellation of its 2022 RFP, and compounded by the expiration of federal tax credits, require immediate action. Running a system wide, open call for resources in short order will allow the Company to capture \$400-650 million in savings per gigawatt of eligible solar and wind procured - savings that will ultimately benefit PacifiCorp’s customers in Oregon and the rest of its service territory. Under existing procurement rules, PacifiCorp can propose an alternative resource acquisition strategy in an IRP to be subsequently acknowledged by the Commission under OAR 860-089-0100(2)(c). RNW

⁴⁰ 2025 IRP at 77, Table 3.6.

⁴¹ Assuming PTC of \$28.16 per MWh and 28% capacity factor.

requests that PacifiCorp propose such a strategy in its next round of comments to enable it to move efficiently to procure resources to capture expiring tax credits for the benefit of customers. Should PacifiCorp not put forward such a proposal, RNW asks Staff, the Commission, and other parties to this proceeding to consider such a proposal. If approved, the alternative resource acquisition strategy detailed in this IRP would enable PacifiCorp to bypass the traditional Competitive Bidding Requirements and move swiftly to capture value for Oregon customers.

D. Resource Procurement Recommendations

In light of both near-term urgency on expiring tax incentives and PacifiCorp's significant, longer-term resource gap in PACW, RNW recommends the Commission direct PacifiCorp to undertake procurement action on two parallel tracks:

- To capture expiring federal tax credits, PacifiCorp should immediately solicit offers for resources which may be capable of capturing federal tax credits. RNW recommends following an "open call" framework for projects with development and interconnection timelines aligned with federal constraints.
- To address longer-term needs, including binding reliability needs in 2028 under WRAP and binding clean energy needs in 2030 under HB 2021, the Commission should direct PacifiCorp to undertake procurement necessary to achieve compliance with both programs. PacifiCorp's initiation of a 2025 Oregon-situs RFP in UM 2383 will likely help fill some of this need. However, as RNW argued in the RFP proceeding, PacifiCorp should be prepared to undertake successive solicitations in order to fulfill its clean energy obligations.⁴²

V. Conclusion and Recommendations

While RNW recognizes that the IRP review process will continue until early 2026, the Commission should consider taking near-term actions—to address the more serious and time-sensitive issues identified here, pending further clarifications or resolution from PacifiCorp on these items.

First, the Commission should direct PacifiCorp under OAR 860-089-0100(2)(c) to initiate an expedited procurement effort to identify and execute on clean energy projects capable of capturing federal tax credits prior to the upcoming federal deadlines. Under the current, unique circumstances, RNW encourages PacifiCorp to follow an "open call" framework for projects with development and interconnection timelines aligned with federal constraints. While the

⁴² Docket No. UM 2383, Comments of Renewable Northwest at 5 (July 7, 2025), *available at*: <https://apps.puc.state.or.us/edockets/edocs.asp?FileType=HAC&FileName=um2383hac337973027.pdf&DocketID=24530&numSequence=30>.

solicitation should not be constrained to Oregon or PACW, resources' contributions to PACW's urgent reliability needs should be considered in weighing the merits of submitted bids.

Second, the Commission should direct PacifiCorp to undertake the procurement necessary to address reliability needs for PACW to meet 2028 WRAP compliance requirements and to achieve HB 2021's 2030 emissions target.

Third, the Commission should affirmatively reject PacifiCorp's unilateral removal of B2H from the preferred portfolio, and direct PacifiCorp to continue efforts to bring B2H forward as a network resource for bundled customer needs. The Commission should require PacifiCorp to present evidence regarding its decision to remove B2H, including any correspondence with Bonneville Power Administration regarding the redirect study for the Longhorn substation, or any other rationale upon which PacifiCorp relies to remove B2H. In this proceeding, the Commission should require PacifiCorp to bring B2H back into its planning to analyze the benefits it would bring for Oregon customers under a modeling run that includes the resource. Eliminating B2H from network service carries major risks and costs for Oregon customers which will result in an unjust and unreasonable outcome when they come before the Commission. The decision to remove B2H must be fully and adequately analyzed in this process to ensure that the IRP results in the optimal blend of cost and risk for Oregon customers, as required by Oregon's statutes and IRP Guidelines.

Fourth, the Commission should affirmatively reject PacifiCorp's proposed cost and resource allocation methodology and direct the development of a methodology which identifies the net cost of state policies while retaining the precedent that system reliability costs be allocated to all customers.

Respectfully submitted this 29th day of July, 2025,

/s/ Mike Goetz

/s/ Katie Chamberlain

/s/ Max Greene

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⁴³ Signatory as to redacted comments only.

⁴⁴ Signatory as to redacted comments only.

⁴⁵ Signatory as to redacted comments only.

Attachment A

PLEXOS Modeling Discussion

Redacted

Attachment A is highly confidential and is redacted in its entirety