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.	RENEWABLE NORTHWEST COMMENTS ON SUPPLEMENTAL FILING

I. INTRODUCTION

Renewable Northwest ("RNW") appreciates the opportunity to comment on PacifiCorp's (PacifiCorp or "the Company") June 30, 2026 Supplemental Filing ("Supplemental Filing") following the Company's 2025 Integrated Resource Plan ("IRP"). The Supplemental Filing appears to represent a shift from PacifiCorp's recent Oregon planning documents, particularly its 2023 IRP Update and Oregon Planning Supplement and its 2025 IRP and Clean Energy Plan ("CEP"). This shift corresponds to recent direction from the Oregon Public Utility Commission ("Commission") that incorporated advocacy by RNW and others. As such, RNW appreciates several components of the Supplemental Filing.

In these comments, RNW first briefly outlines the Supplemental Filing's background before addressing several substantive topics. First, RNW offers conditional support for a Commission determination of continual progress, subject to similar caveats that we raised in our prior comments regarding the ongoing pace and scale of procurement and attendant decarbonization.[1] The Supplemental Filing demonstrates that if PacifiCorp executes contracts with most, but not all of the resources selected to the Final Shortlist of its 2025 Oregon Situs Request for Proposals ("RFP") then it will achieve its mandatory 2030 emissions-reduction target. Accordingly, continual progress should be conditioned on PacifiCorp's good-faith efforts to execute contracts with enough resources that it will meet its 2030 target. Outside of continual progress, RNW offers brief comments on PacifiCorp's overall procurement strategy, the implications of procurement for the HB 2021 cost cap, PacifiCorp's loop modeling methodology, and its efforts

[1] Renewable Northwest Comments on Staff Report at 4-5 (Jan. 26, 2026) ("[W]hat constitutes continual progress in this procurement cycle does not necessarily mean that a similar procurement volume will constitute continual progress in the future. As we close in on HB 2021's binding mandates, the utility will have to do more and more to demonstrate continual progress has been met.").

to align DEQ emissions accounting rules with regional markets. Overall, RNW appreciates PacifiCorp's efforts reflected in the Supplemental Filing and the opportunity to submit these comments to the Commission.

II. BACKGROUND

On March 31, 2025, PacifiCorp filed its 2025 IRP, with its CEP following on June 30.[2] Although the IRP and CEP indicated PacifiCorp's plans to undertake procurement efforts to align with Oregon policy, RNW identified three overarching concerns with the IRP and CEP.[3] First, RNW was concerned that PacifiCorp's modeling approach did not sufficiently account for physical reliability needs on the west side of PacifiCorp's system, and potentially improperly proposed situs assignment of resources to Oregon. Second, this concern was exacerbated by PacifiCorp's removal of the Boardman-to-Hemingway transmission line as a system resource. And third, PacifiCorp had demonstrated a past unwillingness to follow through on procurement needs, so RNW lacked confidence in its procurement plans.[4] RNW stressed that continued procurement delays would not only threaten PacifiCorp's ability to comply with Oregon policy but also cost customers billions of dollars in lost tax credits.

RNW was not alone in expressing these concerns. On February 24, 2026, the Commission issued Order No. 26-054, acknowledging portions of the 2025 IRP, declining to acknowledge other portions, and conditionally acknowledging still other portions. Among other things, Order No. 26-054 required PacifiCorp, before July 2026, to:

> i. Present a resource acquisition plan that addresses system reliability as well as state-specific needs and includes annual targets and important milestone (Recommendation 2), and
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> ii. For HB 2021 compliance, provide a structured execution strategy with time-bound deliverables regarding procurement, allocation of existing resources, clean market purchase, and gas dispatch (Recommendation 10).[5]

The Commission also deferred decision on continual progress,

> direct[ing] Staff to bring a recommendation on whether the company has demonstrated continual progress towards meeting HB 2021 emissions goals to a future public meeting to allow consideration of the information directed in part 3a

[2] 2025 IRP and CEP (Mar. 31, 2025).
[3] *See* Redacted Comments of RNW (July 29, 2025).
[4] *Id.*
[5] Order No. 26-054 at 2 (Feb. 24, 2026).

> (Recommendations 2 and 10), to be filed in either the company's IRP Update or a separate filing before July 2026.[6]

Thus, the Commission was clear that a finding of continual progress would likely require procurement, among other actions.

Accordingly, PacifiCorp conducted its 2025 Oregon Situs RFP. This process resulted in a May 29, 2026 Request for Acknowledgement of a Final Shortlist ("FSL") that included approximately 1,600 MW of generating resources and 1,300 MW of storage resources.[7] The Commission acknowledged PacifiCorp's FSL on June 23, 2026.[8] RNW appreciates the collaborative approach PacifiCorp took to address many of RNW's concerns in the RFP.

The Supplemental Filing followed. The Supplemental Filing responded to the conditions and requirements the Commission established in Order No. 26-054. As to continual progress, PacifiCorp reported a 19.05% reduction in greenhouse gas ("GHG") emissions as of 2024 – its most recently reported year of emissions – but also projected "that resources procured from the 2025 Oregon Situs RFP will further reduce emissions to achieve an 81 percent reduction in baseline emissions by 2030."[9] Of the shortlisted resources that will drive that emissions reduction, the vast majority are expected to come online over the course of 2029.[10]

In furtherance of the Commission's direction, and cognizant of potential opportunities to expand its bid pool and conduct additional procurement in advance of its 2035 and 2040 targets, PacifiCorp also outlined in the Supplemental Filing its overall procurement efforts including a second phase of the 2025 Oregon Situs RFP and a general plan to issue "rolling or annual procurements, as required, to address capacity and energy needs over time."[11]

Finally, the Supplemental Filing discussed certain other topics including the nexus between HB 2021 compliance and regional market participation, and PacifiCorp's use of a new modeling technique to try to better understand the effects of different cost drivers on resource selection.

III. CONTINUAL PROGRESS

In the Supplemental Filing, PacifiCorp says:

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[6] Order No. 26-054 at 5 (Feb. 24, 2026).
[7] *In the Matter of 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, PA Consulting's IE Closing Report at 49 (May 29, 2026).
[8] Docket No. UM 2383, Order No. 26-215 at 1 & Appendix A at 22-23 (June 23, 2026).
[9] PacifiCorp's 2025 IRP and CEP Supplement ("Supplemental Filing") at 10 (June 30, 2026).
[10] *Id.*
[11] *Id.* at 29.

> [T]he company is making adequate continual progress to reduce greenhouse gas emissions … based on actual and forecasted performance, where PacifiCorp has reduced HB 2021 emissions by 19 percent compared to baseline emissions, based on 2024 verified emissions, and when combined with resources from the 2025 Oregon Situs RFP final shortlist and demand-side actions, are forecasted to reduce PacifiCorp's HB 2021-related emissions by 81 percent by 2030.[12]

Continual progress must be "towards meeting the clean energy targets" and depends on a "robust weighing of costs, risks, and forecasted emissions reduction trajectories."[13] Unlike past plans, PacifiCorp's CEP reflected a primary strategy of procuring clean resources including generation, storage, and demand-side resources to displace emitting generation. Since filing the CEP, PacifiCorp has taken steps to implement this strategy, gone to market for new clean resources, and identified a FSL that is projected to achieve an 81% emissions reduction by 2030.

Based on the FSL and Supplemental Filing, RNW offers conditional support for a Commission determination of continual progress. The Supplemental Filing demonstrates that if PacifiCorp executes contracts with most, but not all, of the resources selected to the Final Shortlist of its 2025 Oregon Situs RFP then it is likely to achieve its mandatory 2030 emissions-reduction target. Accordingly, continual progress should be conditioned on PacifiCorp's good-faith efforts to execute contracts with enough resources that it will meet its 2030 target and acknowledge that future procurement and other actions to reduce emissions on its system must scale in proportion to HB 2021's binding targets.

RNW's proposed solution is intended to be practical. It reflects PacifiCorp's past decision to abandon an in-process procurement that once served as the cornerstone of its HB 2021 compliance efforts, and ensures the Commission will retain an active role so it can step in quickly if PacifiCorp pivots from its current trajectory. However, by focusing on good-faith efforts, it also reflects the reality that PacifiCorp may not be able to execute contracts with all the resources necessary to achieve its projected 81% emissions reduction. Thus RNW's solution strikes a least-cost, least-risk balance between keeping *some* pressure on PacifiCorp to execute its strategy and avoiding *so much* pressure that PacifiCorp feels compelled to execute unreasonable contracts.

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[12] *Id.* at 4.
[13] ORS 469A.415(4)(e); 469A.415(6); *In the Matter of Commission Investigation Into House Bill 2021 Implementation Issues*, Docket No. 2273, Order No. 24-002 at 29 (Jan. 5, 2024).

IV. PROCUREMENT

RNW offers brief comments on two aspects of PacifiCorp's procurement efforts reflected in the Supplemental Filing.

First, RNW notes PacifiCorp's defense of its just-in-time procurement strategy. PacifiCorp acknowledges that "the pace of HB 2021 procurement over the past several years has been influenced by PacifiCorp's financial condition and wildfire liabilities," but argues that "[b]y procuring resources later in the decade, PacifiCorp has postponed incremental HB 2021 compliance costs to later years, that corresponds closely to when coal resources will be removed from rates pursuant to Senate Bill 1547 (SB 1547)."[14] PacifiCorp continues that "[d]elayed procurement postpones these cost pressures, while still retaining valuable federal tax credit benefits, and allows for resources to come into rates near when coal resources will be removed."[15]

RNW appreciates PacifiCorp's acknowledgment that just-in-time procurement raises compliance concerns, but does not find PacifiCorp's defense of just-in-time procurement convincing on either a policy-compliance or an economic basis. For starters, PacifiCorp's own filings in other dockets suggest its deferred costs are not "incremental HB 2021 compliance costs."[16] Additionally, to RNW's knowledge there is no modeling that specifically indicates benefits from delayed procurements.[17] To the contrary, PacifiCorp's past modeling defended its procurement delays by using inflated clean-resource costs.[18] Although new resource additions would be timed with thermal generation rolling out of rates in PacifiCorp's proposal, customers will still experience rate shock related to a significant number of investments brought on in a short amount of time. A smoother glide path towards HB 2021 compliance would mitigate these impacts. Finally, PacifiCorp acknowledges that one of its shortlisted projects is not eligible for federal tax credits.[19] Given various disruptions to supply chains and federal policy, it is not improbable that the FSL resources would have been more cost-effective had they been procured earlier. RNW raises these responses not to call into question PacifiCorp's current procurement efforts, which we strongly support. Rather, RNW recommends the Commission bear these dynamics in mind when considering future procurement trajectories.

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[14] Supplemental Filing at 12.
[15] *Id.*
[16] *See* Docket No. UM 2383, Request for Acknowledgement of Final Shortlist of Bidders in 2025 Oregon RFP at 26, 31 (May 29, 2026) ("only a small fraction of final shortlist resources are 'for the purpose of,' or 'contribute to compliance with,' HB 2021").
[17] In fact, PGE specifically modeled early, just-in-time, and middle-of-the-road procurement approaches and found benefits from the middle-of-the-road approach. *See In the Matter of Portland General Electric Company ("PGE"), 2023 Clean Energy Plan and Integrated Resource Plan*, Docket No. LC 80.
[18] Docket No. LC 80, Comments of RNW on PGE's 2023 IRP/CEP Update (Aug. 11, 2025).
[19] Supplemental Filing at 12.

This leads to the second aspect of PacifiCorp's procurement efforts RNW would like to highlight. We specifically support PacifiCorp's efforts regarding a second phase of its 2025 Oregon Situs RFP. PacifiCorp says:

> The second phase of the RFP is aimed to potentially broaden the bidder pool, take advantage of potential clarity on the connection between Longhorn substation and PACW, or other opportunities to connect the Boardman-to-Hemingway (B2H) transmission project to PACW, and aligns with PacifiCorp Transmission transition cluster study which is also scheduled for 2026.[20]

This rationale follows RNW's in recommending a second phase, and the Commission's in directing one.[21] RNW appreciates PacifiCorp's follow-through and recognition that the connectivity provided by B2H will allow for a broader bidder pool. We look forward to seeing the draft Phase II RFP filed in August and released to market by the end of the year.

V. COST CAP

The Supplemental Filing generally "[p]ut[s] aside [HB 2021]'s cost cap and reliability exemptions."[22] However, RNW generally agrees with PacifiCorp's statement in another docket that "only a small fraction of final shortlist resources are 'for the purpose of,' or 'contribute to compliance with,' HB 2021."[23] RNW briefly observes, as we did in Docket No. UM 2383, that this is not the docket for *conclusions* regarding cost cap implications. We also recognize that HB 2021 constrains the resources that are available to meet PacifiCorp's needs driven by other policy and technical needs, but that constraint does not undermine the takeaway that those needs are real. However, we believe it is important to support PacifiCorp's general strategy in the Supplemental Filing of procuring new clean resources to meet those needs. At a high level, clean resources continue to be the most cost-effective resources.[24] However, related to our comments in the prior section, a more smooth procurement strategy that spreads out investments in clean energy resources is less likely to trigger the cost cap in an individual year than would a just-in-time procurement strategy. In order to further the spirit of HB 2021 and to smooth out

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[20] *Id.* at 29.
[21] *Id.*
[22] *Id.* at 12.
[23] Docket No. UM 2383, Request for Acknowledgement of Final Shortlist of Bidders in 2025 Oregon RFP at 26.
[24] Lazard's Levelized Cost of Energy+ (LCOE+) Analysis—Version 19.0 at 4 (July 13, 2026), available at: https://www.lazard.com/media/sdvdrvc5/lazards-lcoeplus_vf.pdf ("Unsubsidized renewable energy remains the most cost-competitive form of new-build generation on an LCOE basis . . . . [T]his year's analysis shows wind and solar LCOEs have continued to rise—reflecting higher capital costs, sustained interest rates, tariff pass-through and supply chain repricing—though they remain below conventional new-build alternatives. Renewables therefore maintain their relative cost advantage despite facing the same cost pressures affecting the rest of the generation stack.").

customer impacts, RNW continues to stress that a just-in-time procurement strategy increases costs and risks unnecessarily.

IV. MODELING

RNW reviewed with interest PacifiCorp's explanation of its loop methodology designed to test the effects of certain policies on resource selection within PacifiCorp's modeling framework. RNW agrees with PacifiCorp that the results were interesting but the methodology need not be carried forward to the 2027 IRP.[25]

RNW notes that, as we understand the loop methodology, it never tested the effects of HB 2021, SB 1547, and Oregon resource adequacy requirements on an individual basis, and instead combined all three resource-selection drivers together. RNW's comments on the 2025 IRP indicated a particular interest in better understanding the relative amount of resource need separately attributable to each *policy* – HB 2021 and SB 1547 – and *adequacy*. This analysis will be integral in assessing HB 2021's impact on customer rates in future potential cost cap proceedings.

While PacifiCorp's analysis concludes that the removal of coal under SB 1547 is the primary near-term driver of resource need,[26] IRP modeling should provide as much information as possible on policy-driven cost drivers. The IRP sets precedent and provides information for other proceedings, and understanding the costs associated with specific policies has planning implications that can inform the IRP process itself. As PacifiCorp faces procurement needs in the leadup to its 2035 and 2040 targets, teasing apart whether policy and/or adequacy drive resource selection will become increasingly valuable. To ensure transparency and to build a robust evidentiary foundation for planning, RNW remains particularly interested in understanding two key points:

1. What are the actual incremental resource requirements and associated cost and savings impacts directly attributable to HB 2021 compliance versus other state-specific drivers?
2. Do Oregon-specific policies create system-wide synergies that reduce incremental compliance costs driven by other state-specific policies?

RNW laid out a theoretical framework that could answer these questions in its comments on PacifiCorp's 2025 IRP,[27] and encourages PacifiCorp to continue refining its modeling capabilities to isolate these individual drivers and capture potential cross-system portfolio benefits in future IRPs.

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[25] Supplemental Filing at 25.
[26] *See* Docket No. UM 2383, Request for Acknowledgement of Final Shortlist of Bidders in 2025 Oregon RFP at 26.
[27] Docket No. LC 85, Round II Comments of RNW at 22-23 (Oct. 9, 2025).

V. EMISSIONS REPORTING

The Supplemental Filing explains a tension between the current Department of Environmental Quality ("DEQ") emissions-accounting rules and PacifiCorp's participation in regional markets. PacifiCorp reports that it "is actively engaged with DEQ, providing information about the value of market participation and advocating for the agency to amend its rules[.]"[28] RNW encourages PacifiCorp to continue to engage with DEQ and to keep the Commission and stakeholders informed about these efforts. We see significant value in PacifiCorp's participation in regional markets and are keenly interested in supporting market participation while ensuring that the power transacted in Western regional markets is increasingly, and eventually entirely, non-emitting.

VI. CONCLUSION

RNW recommends the Commission issue a finding that PacifiCorp has demonstrated continual progress, conditioned on PacifiCorp's good-faith negotiation for contracts with resources listed on the 2025 Oregon Situs RFP FSL. Aside from that specific recommendation, RNW offers general support for PacifiCorp's Supplemental Filing and appreciation for the opportunity to submit these comments.

Respectfully submitted this 28th day of July, 2026,

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[28] Supplemental Filing at 35.