

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF ROCKY MOUNTAIN)	CASE NO. PAC-E-19-01
POWER'S PETITION FOR AN EXTENSION)	
TO FILE ITS 2019 INTEGRATED)	
RESOURCE PLAN)	ORDER NO. 34275

On January 28, 2019, Rocky Mountain Power ("Company") filed a Petition seeking to extend the March 29, 2019 filing date for the Company's 2019 Integrated Resource Plan ("IRP").

BACKGROUND

The IRP is "a status report on the utility's ongoing, changing plans to adequately and reliably serve its customers at the lowest system cost and least risk over the next 20 years." Order No. 34018. The Commission has required the Company to file a planning document biennially since 1987 when the Commission ordered the Company to file its Resource Management Report—a precursor to the IRP—beginning in March of 1989. Order No. 22299. The Company's 2019 IRP will be its 15th comprehensive planning document submitted to the Commission.

THE PETITION

The Company requests an extension of its March 29, 2019 IRP filing deadline to a date no later than August 1, 2019. The Company, through its economic analysis of its coal units, has identified potential reliability challenges that must be resolved before the Company's coal studies can be completed. The coal studies will inform the Company's preferred resource portfolio put forth in its IRP. According to the Company, "This extension will enable PacifiCorp to complete its economic analysis of coal units, appropriately accounting for system reliability, and necessary additional portfolio analysis." Petition at 2. The Company states that if the Commission approves the extension, the Company will continue to hold monthly public-input meetings up to the extended filing date. The Company also states it communicated to stakeholders its intent to file this request for an extension.

COMMENTS

Staff and the Idaho Conservation League ("ICL") filed the only comments, and recommended that the Commission grant the Petition.

A. Commission Staff.

Staff recommended the Commission approve the Company's request to delay submission of its 2019 IRP. Staff stated its belief that providing the Company more time would allow the Company to better evaluate how its reduced operating reserves from coal plants could affect system reliability. Further, Staff indicated that a better understanding of the system reliability effects of coal plant closures might inform negotiations taking place around the Company's Multi-State Protocol ("MSP"). The MSP is being revised to remove coal-fired generation from rates in jurisdictions where removal is required by state law. Staff also stated its belief that follow-on delays from a delay to the IRP filing, such as updates to capacity deficiency dates under the Public Utility Regulatory Policies Act of 1978, or impacts to the Company's ongoing depreciation case, PAC-E-18-08, would be minimal.

B. Idaho Conservation League.

ICL filed comments in support of the Company's request to delay the filing date of its 2019 IRP. ICL suggested the Commission not set a filing date for the 2019 IRP, but direct the Company to file its IRP when it contains a complete analysis of relevant issues.

COMMISSION FINDINGS AND DECISION

The Company is an electrical corporation and public utility as defined in *Idaho Code* §§ 61-119, 61-129. The Commission has jurisdiction over the Company and the issues in this case under Title 61 of the Idaho Code, including *Idaho Code* § 61-501.

The Commission has reviewed the Company's Petition and the comments of Commission Staff and ICL. Based on our review of the record, we find it reasonable to approve the Company's request for an extension of its IRP filing deadline until a date no later than August 1, 2019. We believe the additional time will provide the Company better opportunity to analyze potential reliability impacts associated with the findings of its coal economic analysis and to integrate its reliability analysis into its preferred resource portfolio.

We decline to adopt ICL's recommendation to not set a deadline and allow the Company to file its IRP when its analysis is complete. IRP analyses are never truly complete. It is an iterative process. As we have stated previously, "We realize that integrated resource planning is an ongoing, changing process. Thus, we consider the [IRP] to be similar to an accounting balance sheet, i.e., a 'freeze-frame' look at a utility's fluid process." Order No. 22299. We have also stated that "an IRP is a working document that incorporates many assumptions and projections

at a specific point in time. It is a plan, not a blueprint.” Order No. 34018. In keeping with our longstanding conception of an IRP as a freeze-frame look at a fluid process, we find it useful to set a deadline. If the Company requires more time to conduct a thorough analysis based on the results of its studies, it can request another extension. Conversely, if the Company completes a thorough analysis before August 1, 2019, it can submit its IRP upon completion.

ORDER

IT IS HEREBY ORDERED that the Company’s Petition for Extension of Time is granted. The Company shall file its IRP no later than August 1, 2019.

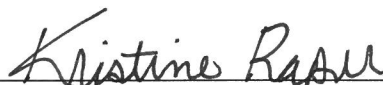
THIS IS A FINAL ORDER. Any person interested in this Order may petition for reconsideration within twenty-one (21) days of the service date of this Order with regard to any matter decided in this Order. Within seven (7) days after any person has petitioned for reconsideration, any other person may cross-petition for reconsideration. *See Idaho Code* § 61-626.

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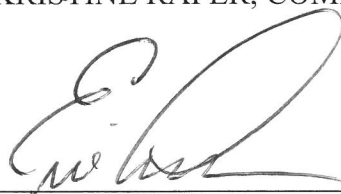
DONE by Order of the Idaho Public Utilities Commission at Boise, Idaho this
day of March 2019.



PAUL KJELLANDER, PRESIDENT



KRISTINE RAPER, COMMISSIONER



ERIC ANDERSON, COMMISSIONER

ATTEST:



Diane M. Hanian
Commission Secretary

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