

DOCKETED

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21-OIR-01 PacifiCorp comments 7 3 24

Additional submitted attachment is included below.

July 3, 2024

VIA ELECTRONIC FILING

California Energy Commission
Docket Unit, MS-4
Re: Docket No. 21-OIR-01
715 P Street
Sacramento, CA 95814-5512

Re: Docket 21-OIR-01 — Power Source Disclosure Pre-Rulemaking Amendments

PacifiCorp d/b/a Pacific Power (PacifiCorp or Company) respectfully submits the following comments in response to the California Energy Commission’s (Commission) May 17, 2024, Notice of Proposed Action amend regulations governing the Power Source Disclosure Program.

I. PacifiCorp appreciates the hourly reporting exemption for small, multijurisdictional electrical corporations

PacifiCorp appreciates the Commission’s inclusion of 1393(h)(3). As stated in previous comments, PacifiCorp’s unique multistate service area shares load across six states, including Washington, Oregon and California. Any oversupply or undersupply calculation would not truly reflect how the company assigns costs and emissions or be indicative of how electricity is transferred between the company and other load serving entities that may or may not be located in the California ISO. Further, the Company’s generation resources are spread as far as Wyoming and Washington state so any proxy resource calculations would not reflect operating conditions in the company’s vast service territory.

II. PacifiCorp supports a minor clarification and a special template for companies reporting under 1393(h)(3) given the complexities of multijurisdictional electrical corporations

PacifiCorp allocates resources and costs based on an agreed upon cost allocation methodology approved by its six state utility commissions. The company would like the new Power Source Disclosure to clearly state this is acceptable, as it is the most accurate reflection of the resources allocated to serve California customers. The Company supports inclusion of the following in the rule:

“Multijurisdictional electrical corporations may report resources based on a cost allocation methodology approved by the California Public Utilities Commission.”

Also, the Company recommends the CEC publish templates that can accommodate up to 400 resources for the 2025 reporting template and publish a separate template for small multijurisdictional electrical corporations exempt from hourly reporting requirements under 1393(h)(3) for 2028 reporting.

California Energy Commission

July 3, 2024

Page 2

Lastly, the company is interested in how unspecified electricity should be reported in the template. The proposed 2025 template requires all unspecified power to be allocated to a portfolio or an error message pops up requesting additional MWh be attributed to an end use. However, unspecified power does not have an EIA ID and is not a listed fuel type in the drop down list. The company would appreciate clarification on whether unspecified electricity should be reported under Facility Name to balance the portfolios and avoid submitting data with error message.

Sincerely,

/s/

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