



1407 W. North Temple  
Salt Lake City, Utah 84116

January 26, 2022

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attn: Gary Widerburg  
Commission Administrator

Re: **Docket No. 21-035-52 - Application of Rocky Mountain Power for Approval of Solicitation Process for 2022 All Source Request for Proposals**

Rocky Mountain Power files its application and supporting pre-filed direct testimony and exhibits of Ms. Heather B. Eberhardt, seeking approval of the solicitation process for the 2022 All Source Request For Proposals ("2022AS RFP").

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding these filings be addressed to the following:

By E-mail (preferred)      [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[emily.wegener@pacificorp.com](mailto:emily.wegener@pacificorp.com)  
[stephanie.barber-renteria@pacificorp.com](mailto:stephanie.barber-renteria@pacificorp.com)

By Regular Mail              Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Jana Saba at (801) 220-2823.

Very truly yours,

A handwritten signature in blue ink that reads "Joelle Steward". The signature is fluid and cursive.

Joelle Steward  
Senior Vice President, Regulation

cc: Service List (Docket No. 21-035-52)

**CERTIFICATE OF SERVICE**

Docket No. 21-035-52

I hereby certify that on January 26, 2022, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

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**Rocky Mountain Power**

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*Attorneys for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of	)	Docket No. 21-035-52
Rocky Mountain Power for Approval of a	)	
Solicitation Process for 2022 All Source	)	
Request for Proposals	)	<b>APPLICATION FOR APPROVAL OF</b>
	)	<b>SOLICITATION PROCESS</b>
	)	
	)	

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In accordance with Utah Code Ann. § 54-17-201 and Utah Admin. Code R746-420, Rocky Mountain Power, a division of PacifiCorp (“Company”) submits this application (“Application”) to the Public Service Commission of Utah (“Commission”). The Company respectfully requests that the Commission issue an order approving the Company’s 2022 All-Source Request for Proposals (“2022AS RFP”), which seeks to procure resources confirmed by the 2021 Integrated Resource Plan (“IRP”) preferred portfolio. The 2021 IRP preferred portfolio identified a resource need for 1,345 megawatts (“MW”) of new renewable wind and solar resources by the end of 2026, including 600 MW of new storage resources. Consistent with the 2021 IRP action window, the 2022AS RFP has a required resource in-service date of December 31, 2026; however, the Company will accept certain long-lead time resource types in the 2022AS RFP, such as nuclear

and pumped storage hydro, which require a longer development and construction schedule, so long as those resources can reach commercial operations by a December 31, 2028, in-service date.

The Company has met the milestones, to date, required for approval of the 2022AS RFP. On August 31, 2021, the Company filed a motion to deviate from the 60-day notice of its intent to seek approval of a solicitation process under Part 2 of the Energy Resource Procurement Act, Utah Code Ann. Title 54, Chapter 17, which the Commission granted on October 4, 2021. On October 8, 2021, the Company filed an updated schedule allowing for the full required 60-day notice prior to issuing the RFP, and on December 14, 2022, filed a courtesy update to the RFP filing timing. On January 11, 2022, the Company held a pre-issuance bidders conference, in compliance with Utah Admin. Code R746-420-1(3)(b-c). In early January 2022, the Commission appointed an independent evaluator (“IE”) for the 2022AS RFP.

The Company respectfully requests an order from the Commission by April 22, 2022. The Company proposes a schedule for this docket that follows Utah Admin. Code R746-420-1(4)(a).<sup>1</sup> The Company proposes to issue the 2022S RFP to the market by May 1, 2022.

In support of its Application, Rocky Mountain Power states as follows:

1. The Company is a public utility that provides electric service to retail customers through its Rocky Mountain Power division in the States of Utah, Wyoming, and Idaho, and through its Pacific Power division in the states of Oregon, California and Washington. Rocky Mountain Power is subject to the Commission’s jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. The Company serves approximately

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<sup>1</sup> Under this rule, stakeholder comments are due within 45 days of the RFP filing date, and comments from the IE are due within 55 days of the RFP filing date. Reply comments from the Company, as necessary, are due within 65 days of the RFP filing date.

948,000 customers in Utah. Rocky Mountain Power's principal place of business in Utah is 1407 West North Temple Street, Salt Lake City, Utah 84116.

2. Communications regarding this Application should be addressed to:

Jana Saba  
Utah State Regulatory Affairs Manager  
Rocky Mountain Power  
1407 West North Temple, Suite 330  
Salt Lake City, Utah 84116  
Telephone: 801-220-2823  
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In addition, the Company requests that all data requests regarding this matter be addressed to:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah, Suite 2000  
Portland, OR 97232

Informal inquiries may be directed to Jana Saba by telephone at 801-220-2823.

## I. SUPPORTING TESTIMONY

1. This Application is supported by the pre-filed written direct testimony and exhibits of Ms. Heather B. Eberhardt, Sr. Commercial Services Power Marketer from the Resource and

Commercial Strategy Group. Ms. Eberhardt’s testimony describes the Company’s proposed solicitation process, the relationship between the solicitation process and the Company’s 2021 IRP. Ms. Eberhardt’s testimony also includes the information required by Utah Admin. Code R746-420-1(1), and demonstrates that the solicitation process will comply with Utah Admin. Code R746-420-1(2) and (3) and R746-420-3. As required by Utah Code Ann. § 54-17-201(2)(b)(ii) and Utah Admin. Code R746-420-1(1)(b), attached to Ms. Eberhardt’s testimony is the Company’s draft 2022AS RFP.

## II. BACKGROUND

2. PacifiCorp’s 2021 IRP was developed through comprehensive analysis and a public-input process spanning almost two years resulting in the selection of a least-cost, least-risk preferred portfolio. The 2021 IRP preferred portfolio includes accelerated coal retirements and investment in transmission infrastructure that will facilitate adding over 3,294 MW of new renewable resources with storage capacity by the end of 2024, with 1,345 MW of additional renewable resources and 600 MW of collocated storage by the end of 2026.<sup>2</sup>

3. PacifiCorp’s 2021 IRP was developed through an open and extensive public process, with input from an active and diverse group of stakeholders, including customer advocacy groups, community members, regulatory staff, and other interested parties. The public-input process began with the first public-input meeting in January 2020. Over the subsequent year and a half, PacifiCorp hosting 18 public-input meetings. Throughout this effort, PacifiCorp received

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<sup>2</sup> By the end of 2024, the 2021 IRP preferred portfolio includes the results of the 2020 All-Source Request for Proposals (RFP) final shortlist resources. These projects include 1,792 MW of wind, 1,302 MW of solar additions, and 697 MW of battery storage capacity—497 MW paired with solar and a 200 MW standalone battery. During this time, the preferred portfolio also includes the acquisition and repowering of Rock River I (49 MW) and Foote Creek II-IV (43 MW) wind projects located in Wyoming. Through the end of 2026, the 2021 IRP preferred portfolio includes an additional 745 MW of wind and an additional 600 MW solar collocated with storage.

valuable input from stakeholders and presented findings from a broad range of studies and technical analyses that shaped and informed the 2021 IRP.

4. The action plan in the 2021 IRP preferred portfolio reflects a resource plan that provides adequate and reliable electricity supply at a reasonable cost and in a manner consistent with the long-term public interest. The IRP identifies the preferred portfolio as the least-cost, least-risk portfolio that can be delivered through specific action items at a reasonable cost and with manageable risks, while ensuring compliance with state and federal regulatory obligations. In the 2021 IRP, PacifiCorp presents a preferred portfolio that builds on its vision to deliver energy affordably, reliably and responsibly through near-term investments in transmission infrastructure that will facilitate continued growth in new renewable resource capacity while supporting substantial investment in energy efficiency programs.

5. The 2021 IRP established an action item to conduct an all-source RFP in 2022. The 2022AS RFP is designed to meet this action item, and is an all-source RFP including renewable and non-renewable resources as well as energy storage, capable of interconnecting with or delivering to PacifiCorp's transmission system in its east or west balancing authority areas.

### **III. APPROVAL REQUIREMENTS**

6. The Company designed the 2022AS RFP to meet each of the requirements of the Energy Resource Procurement Act, Utah Code Ann. §§ 54-17-1 *et seq.*, and all corresponding requirements under the Commission's rules.

7. Utah Admin. Code R746-420-1(a) requires the Company to provide a description of the solicitation process. This Application and Ms. Eberhardt's testimony generally describe the purpose and details of the solicitation process.

8. Utah Admin. Code R746-420-1(b) requires the Company to provide with its application a copy of the complete proposed Solicitation with appendices, attachments and draft pro forma contracts. Exhibit RMP\_\_\_(HBE-1) to this Application is the draft 2022AS RFP with associated appendices, which include pro forma agreements or term sheets to accommodate resource types and bid structures including forms of power purchase agreement (“PPA”), tolling agreements for battery storage proposals, and a term sheet for build-transfer agreements (“BTA”), plus required bidder forms and instructions, and other technical information.

9. Utah Admin. Code R746-420-1(d) requires, “[d]escriptions of the criteria and the methodology, including any weighting and ranking factors, to be used to evaluate bids...” In the draft 2022AS RFP, included as Exhibit RMP\_\_\_(HBE-1), Section 6, the bid evaluation process is described in detail.

10. As required by R746-420-1(e), the draft 2022AS RFP (*see*, Exhibit RMP\_\_\_(HBE-1), Section 3.D) directs interested parties to the Company’s RFP website<sup>3</sup> where they may direct all questions and answers regarding the solicitation and solicitation process.

11. Utah Admin. Code R746-420-1(f) requires the Company to provide interested parties “[i]nformation on how participants in the pre-issuance Bidders’ conference should submit advance written questions to the Soliciting Utility that are to be addressed at the pre-issuance Bidder's conference.” The pre-issuance Bidders’ conference was held on January 11, 2022. In advance of that conference the Company posted information about the conference and how to participate on its 2022AS RFP webpage. In addition, the Company included an email address where written questions could be submitted in advance of the conference. The presentation the Company provided is provided in Exhibit RMP\_\_\_(HBE-2), and Ms. Eberhardt’s testimony

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<sup>3</sup> [www.pacificorp.com/suppliers/rfps/2022-all-source-rfp](http://www.pacificorp.com/suppliers/rfps/2022-all-source-rfp)



confirms that the Company has complied with the other rule requirements for the pre-issuance conference.

12. The “list of potentially interested parties to whom the Soliciting Utility has sent or will send notices of the filing of the request for approval of the proposed solicitation with the Commission” required by Utah Admin. Code R746-420-1(g), is included with this Application as Exhibit RMP\_\_\_(HBE-3). The notice identifies the timeline for providing comments and other input about the draft 2022AS RFP.

13. The proposed timeline for the 2022AS RFP is as follows:

<b>Milestone</b>	<b>Date</b>
RFP Issued to market	04/26/2022
First Bidders Conference	05/06/2022
PacifiCorp Transmission Cluster Study - request window closes	05/16/2022
Second Bidders Conference	10/20/2022
Last day for RFP questions to IEs for Q&A	11/01/2022
PacifiCorp Transmission Cluster Study – cluster study results available	11/12/2022
Notice of Intent to Bid due	11/17/2022
Benchmark Resource bids due	11/21/2022
Benchmark Resource evaluations complete	01/13/2023
RFP market bids due	01/16/2023
Bid eligibility screening completed	02/15/2023
Capacity factor and BESS evaluation complete	02/23/2023
Performance optimization modeling (PLEXOS) generates Final Shortlist (FSL)	04/14/2023
Final Shortlist (FSL) selected	04/24/2023
IEs' review of FSL Completed	05/05/2023
Complete negotiation of T&Cs for resource agreements	10/13/2023
Execute Agreements	11/21/2023
Winning Bid Guaranteed COD	12/31/2026

14. To ensure a transparent and fair process, the proposed RFP will be conducted under the oversight of the IE approved by the Commission as well as two other IEs approved by Oregon and Washington commissions. An IE was approved by the Public Utility Commission of Oregon (“OPUC”) to oversee the RFP to ensure the process is consistent with the OPUC’s competitive

bidding guidelines as well as transparent and fair to all involved.<sup>4</sup> An IE was also approved by the Washington Utilities and Transportation Commission (“WUTC”) to oversee the RFP to ensure the process is consistent with WUTC’s purchases of resources for electric companies rules and conducted fairly, transparently, and properly.<sup>5</sup>

15. The Company intends to propose site-specific, self-build and purchase resource options, referred to as Benchmark Options, into the 2022AS RFP. *See* Utah Code Ann. § 54-17-102(2) and Utah Admin. Code R746-420-3(4). The Benchmark Options will ensure there is a sufficient amount of new wind and solar resource capacity available in the solicitation process, as required to deliver customer benefits identified in the 2021 IRP. This Application, Ms. Eberhardt’s testimony, and the draft 2022AS RFP demonstrate that the solicitation meets the Benchmark rules. The proposed 2022 RFP includes a description of the Benchmark facility(ies). All proposals will be evaluated using the same assumptions, modeling, and scoring as bids from the market. Evaluations will be fair and non-preferential to Benchmark Options. The IE will have access to review the reasonableness of all scores, including scores assigned to Benchmark Options. Benchmark Option bid evaluation scores will be validated by IE and will not be subject to change unless updates are allowed for all bids.

16. The Commission’s RFP rules require that the IE “blind” all bids for the evaluation process. Utah Admin. Code R746-420-3(10)(a). The Company requests a waiver of this requirement, consistent with prior waivers granted by the Commission.<sup>6</sup> As with prior processes,

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<sup>4</sup> See, In the Matter of PacifiCorp, dba Pacific Power, , For an Order Approving its Application for Approval of an Independent Evaluator in 2022 All-Source Request for Proposals, Docket No. UM 2193, Order No. 21-351.

<sup>5</sup> See, In the Matter of the Petition of PacifiCorp, d/b/a Pacific Power & Light Company, For an Order Approving its Recommended Independent Evaluator, Docket No. UE-210779, Order 01 (Nov. 12, 2021)

<sup>6</sup> See, e.g., *Application of Rocky Mountain Power for Approval of Solicitation Process for 2020 All Source Request for Proposals*, Docket No. 20-035-05, Order Approving 2020 All Source RFP at 18 (July 17, 2020); *Application of Rocky Mountain Power for Approval of Solicitation Process for Wind Resources*, Docket No. 17-035-23, Order Approving RFP With Suggested Modification at 12 (September 22, 2017); *In the Matter of the Application of*

blinding bids in the 2022AS RFP will provide limited value because the detailed project information included in each bid (e.g., the proposed location of the resource) will effectively identify the bidder. Blinding bids imposes additional burdens on the IE and the Company that will have no impact on the overall fairness of the solicitation process.

14. To approve a solicitation process, the Commission must determine that it is in the public interest, after considering the following:

- whether the decision will most likely result in the acquisition, production, and delivery of utility services at the lowest reasonable cost to the retail customers of the utility;
- long-term and short-term impacts;
- risk;
- reliability;
- financial impacts on the utility; and
- other factors determined by the Commission to be relevant.

*See Utah Code Ann. § 54-17-201(2)(c)(ii). See also Utah Admin. Code R746-420-3(1)(b)(ii) (setting forth same standard).*

15. This Application, Ms. Eberhardt's testimony, and the draft 2022AS RFP demonstrate that the solicitation is designed to procure resources that will meet the Company's least-cost, least-risk criteria. The Company's 2021 IRP demonstrates that the resources identified in the preferred portfolio are likely to deliver substantial reliability benefits. As Section 6 of the 2022AS RFP states, the portfolio optimization tools (PLEXOS) used for the 2021 IRP are the same

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*PacifiCorp, by and through its Rocky Mountain Power Division, for Approval of a Solicitation Process for a Flexible Resource for the 2012-2017 Time Period, and for Approval of a Significant Energy Resource Decision, Docket No. 07-035-94, Commission's Suggested Modifications and Order at 18 (May 23, 2008) (granting waiver of blinding requirement after noting that both the IE and the Division of Public Utilities "question the value of blinding bids" because "while the blinding of names of bidders was valuable during the question and answer period, the specific blinding of bids did not have commensurate value given the level of effort.").*

that will be used to evaluate 2022AS resources and guide prudent resource acquisition paths that maintain system reliability at a reasonable cost. Moreover, the analysis of bids using PLEXOS, the performance optimizations tool, will allow the Company to determine whether any bids received are expected to deliver customer benefits over the long and short term. The terms of RFP do not require the Company to select any winning bidders, and therefore will not commit the Company to moving forward with any projects that do not meet the public interest criteria in Utah Code Ann. § 54-17-201(2)(c)(ii) and the Commission's rules. Ms. Eberhardt's testimony also demonstrates that the Company has access to a variety of funding sources to acquire the resources sought in the 2022AS RFP, and the Company is capable of accessing those funding sources without negative financial impacts.

16. The proposed solicitation process is fair, reasonable and in the public interest. Utah Admin. Code R746-420-3(1)(a). The 2022AS RFP will be conducted in accordance with the Commission's rules, as described in Ms. Eberhardt's testimony. The Commission has approved the selection of the IE. The IE will ensure that the process is transparent, ensure that all bids are treated fairly and scored consistent with the Commission's rules, oversee the bid scoring and evaluation process, independently score and evaluate the Benchmark Resources, and report its findings and conclusions to the Commission. The 2022AS RFP will include robust participation by the IE and stakeholder involvement. These facts, coupled with the approvals provided by the Commission throughout the process, will ensure that the 2022AS RFP is fair and reasonable.

17. The proposed RFP process will also be "sufficiently flexible to permit the evaluation and selection of those resources or combination of resources determined by the Commission to be in the public interest," and designed to solicit a robust set of bids. Utah Admin. Code R746-420-3(1)(b)(iii)-(iv). The process will be open to bids offering PPAs, BTA, stand-

alone storage via tolling agreements, and bidder proposed alternative ownership structures. While the Company will be submitting Benchmark Options, the process is designed to ensure that those resources are not given an unfair advantage and that every bid is evaluated on the same terms. The RFP also does not commit the Company to move forward with particular bidders and ensures that the Commission will have the ability to influence final selections in accordance with its determinations of the public interest.

18. The process must also be “commenced sufficiently in advance of the time of the projected resource need to permit and facilitate compliance with the Act and the Commission rules and a reasonable evaluation of the resource options that can be available to fill the projected need” and satisfy the “Commission’s criteria for approving a significant energy resource decision.” Utah Admin. Code R746-420-3(1)(b)(v). The Company is seeking approval of this solicitation process nearly six months after it submitted the 2021 IRP to the Commission on September 1, 2021. The Commission and other parties to this proceeding will have had sufficient time to review that IRP before any final selections in the 2022AS RFP will be made, which will allow the Commission a meaningful opportunity to reasonably evaluate the resource options and the need.

19. This Application and Ms. Eberhardt’s testimony demonstrates that the Company’s proposed solicitation process satisfies the requirements of the Energy Resource Procurement Act, Utah Code Ann. § 54-17-201 *et seq.* Specifically, Ms. Eberhardt’s testimony includes the material required by Utah Admin. Code R746-420-1(1) and Utah Code Ann. § 54-17-201(2)(b)(iii). Ms. Eberhardt’s testimony also describes the pre-bid-issuance process, demonstrating that the Company complied with the requirements of Utah Admin. Code R746-420-1(3). Ms. Eberhardt’s testimony also demonstrates that the solicitation process conforms to the requirements in Utah Admin. Code R746-420-3.

### III. CONCLUSION

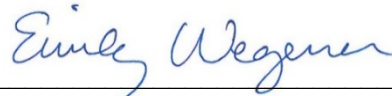
WHEREFORE, based on the foregoing and by this application, the Company respectfully requests that the Commission:

- a) Set a schedule in this matter that is consistent with R746-420-1(4)(a);
- b) Issue an order approving the 2022AS RFP by April 22, 2022;
- c) Waive the Utah Admin. Code R746-420-3(10)(a) requirement for “blinding” bids for the reasons stated herein; and
- d) Grant such other relief it deems just and reasonable and in the public interest.

DATED this 26<sup>th</sup> day of January, 2022.

Respectfully submitted,

ROCKY MOUNTAIN POWER



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Emily Wegener

Stephanie Barber-Renteria

*Attorneys for Rocky Mountain Power*

Rocky Mountain Power  
Docket No. 21-035-52  
Witness: Heather B. Eberhardt

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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Direct Testimony of Heather B. Eberhardt

January 2022

1 **Q. Please state your name, business address, and present position with PacifiCorp**  
2 **d/b/a Rocky Mountain Power (“PacifiCorp” or “the Company”).**

3 A. My name is Heather B. Eberhardt. My business address is 825 NE Multnomah Street,  
4 Suite 600, Portland, Oregon 97232. I am employed by PacifiCorp in Resource and  
5 Commercial Strategy, as Sr. Commercial Services Power Marketer.

6 **Q. Briefly describe your education and business experience.**

7 A. I have a B.A. in economics from Colby College and a masters of international  
8 management from Thunderbird, the Global School of International Management. I  
9 have been employed by the Company for over four years and previously worked for  
10 ten years in various positions of project development, procurement, project finance,  
11 mergers and acquisitions for renewable energy developers EDF Renewable Energy and  
12 NextEra Energy Resources.

13 My current responsibilities as Sr. Commercial Services Power Marketer include  
14 the negotiation and management of wholesale power supply and resource acquisition  
15 through requests for proposals (“RFP”) as well as Public Utility Regulatory Policies  
16 Act (“PURPA”) requests from qualifying facilities. Most relevant to this docket, I am  
17 responsible for procuring generation resources and new power purchase agreements  
18 (“PPA”) through implementation of competitive solicitation processes consistent with  
19 applicable state procurement rules and guidelines.

20 **Overview of Testimony**

21 **Q. What is the purpose of your testimony?**

22 A. My testimony supports the Application of Rocky Mountain Power for approval of the  
23 solicitation process proposed in PacifiCorp’s 2022 All-Source Request for Proposals



24 (“2022AS RFP”). This Application is filed under the Utah Energy Resource  
25 Procurement Act (“Act”), in accordance with Utah Code § 54-17-201 *et seq.* and Utah  
26 Admin. Code R746-420-1 *et seq.*

27 **2022AS RFP Background and Procedural History**

28 **Q. Please explain the scope of the 2022AS RFP.**

29 A. PacifiCorp established an action item out of its 2021 Integrated Resource Plan  
30 (“IRP”) to conduct an all-source RFP in 2022. The 2022AS RFP is an all-source RFP  
31 including renewable and non-renewable resources as well as energy storage, capable  
32 of interconnecting with or delivering to PacifiCorp’s transmission system in its east  
33 or west balancing authority areas (“PACE” and “PACW”, respectively). The 2022AS  
34 RFP is seeking resources consistent with its 2021 IRP preferred portfolio which  
35 identified 1,345 megawatts (“MW”) of new proxy wind and solar energy resources  
36 collocated with 600 MW of new proxy battery energy storage system (“BESS”)  
37 capacity by the end of 2026.<sup>1</sup> In addition, PacifiCorp will accept certain long-lead  
38 time resource types such as nuclear and pumped storage hydro in the 2022AS RFP,  
39 which require a longer development and construction schedule, so long as those types  
40 can achieve a December 31, 2028 in-service date.

41 **Q. Why is PacifiCorp proposing to issue the 2022AS RFP?**

42 A. There are two major reasons. First, PacifiCorp’s 2021 IRP evaluated the long-term  
43 resource needs of PacifiCorp, including transmission projects that would be required  
44 to support those identified proxy resources. PacifiCorp is initiating the 2022AS RFP  
45 now consistent with the action item window identified in the 2021 IRP.

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<sup>1</sup> The figures for solar and wind exclude resource capacity added to meet assumed customer preference targets that are included in the 2021 IRP preferred portfolio.

46                   Second, the 2021 IRP identified the need for additional firm capacity in 2026  
47                   of over 2,000 MW after accounting for expected incremental procurement of energy  
48                   efficiency and planned early retirements. The amount of “firm” capacity from new  
49                   generating resources being contemplated in the RFP, based on preferred portfolio  
50                   resource selections, totals just over 1,345 MW. The 2022AS RFP will procure  
51                   resources to reduce PacifiCorp’s capacity deficit during the action plan timeframe. If  
52                   the Company does not acquire additional resources through the 2022AS RFP it risks  
53                   not meeting its reliability obligations.

54                   **Compliance with Utah Statutes and Rules**

55                   **Q.     Has PacifiCorp provided the 60-day notice required by Utah Admin. Code**  
56                   **R746-420-1(3)(a)?**

57                   A.     Yes. On October 8, 2021, PacifiCorp provided the required 60-day notice to allow  
58                   the Commission to promptly retain an Independent Evaluator (“IE”) to monitor the  
59                   2022AS RFP, as required by Utah Code § 54-17-203.

60                   **Q.     Has PacifiCorp held a pre-issuance bidders conference in Utah, either in-person**  
61                   **or by teleconference, with those who might be interested in participating in the**  
62                   **2022AS RFP?**

63                   A.     Yes; as required by Utah Admin. Code R746-420-1(3), PacifiCorp held a pre-  
64                   issuance bidders conference on January 11, 2022; the presentation provided at that  
65                   conference is attached as Exhibit RMP\_\_\_(HBE-2).

66 **Q. At the conference, did PacifiCorp describe the timeline for the Commission’s**  
67 **review of the draft 2022AS RFP and opportunities for providing input,**  
68 **including sending comments and questions to the IE, as required by Utah**  
69 **Admin. Code R746-420-1(3)(c)?**

70 A. Yes. PacifiCorp advised bidders and stakeholders of its plan to file the draft 2022AS  
71 RFP by January 26, 2022, reviewed the draft schedule with conference participants,  
72 including the timeline for regulatory review by the Commission, and notified  
73 potential bidders and stakeholders of opportunities to provide input and comments on  
74 the draft 2022AS RFP.

75 **Q. Will PacifiCorp provide bidders the opportunity to submit questions and receive**  
76 **responses from PacifiCorp regarding the 2022AS RFP, as required by Utah**  
77 **Admin. Code R746-420-1(1)(e)?**

78 A. Yes; PacifiCorp will track and review bidder questions and the Company will provide  
79 bidders a direct response and post such responses on its 2022AS RFP webpage.  
80 Bidders and stakeholders can also submit questions directly to the IE who will  
81 coordinate with PacifiCorp to secure a response. I discuss the IE’s involvement in  
82 this process in more detail later in my testimony.

83 **Q. Have you attached a copy of the proposed solicitation with appendices and draft**  
84 **pro forma contracts, as required by Utah Code § 54-17-201(2)(b)(ii) and Utah**  
85 **Admin. Code R746-420-1(1)(b)?**

86 A. Yes. Exhibit RMP\_\_\_(HBE-1) is the draft 2022AS RFP with associated appendices,  
87 which include pro forma agreements or term sheets to accommodate resource types  
88 and bid structures including two forms of PPA, a tolling agreement for standalone

89 energy storage, a term sheet for build-transfer agreements (“BTA”), and a  
90 professional services agreement for demand-side bidders plus required bidder forms  
91 and instructions, and other technical information. In general, the 2022AS RFP  
92 describes: (1) the organization and administration of the 2022AS RFP including the  
93 schedule, the IE’s involvement throughout the RFP process, the RFP teams  
94 participating in the process, bid eligibility requirements, bid forms and evaluation  
95 fees, and information about how to submit questions; (2) RFP content including a  
96 description of bid proposal structures or variations of those structures, proposal  
97 instructions, and pro forma agreements; (3) resource information including pricing,  
98 resource characteristics and performance, bid eligibility, tax credits and project  
99 incentives, and interconnection, integration and transmission service requirements;  
100 (4) bid evaluation and selection process; and (5) awarding of contracts.

101 **Q. Does the draft 2022AS RFP provide a description of the solicitation process, as**  
102 **required by Utah Code § 54-17-201(2)(b)(i)?**

103 A. Yes. The draft 2022AS RFP provides a description of the solicitation process. The  
104 draft 2022AS RFP also contains numerous appendices that provide additional  
105 information and instructions to potential bidders regarding the nature of the  
106 solicitation process.

107 **Q. Has PacifiCorp provided a list of potentially interested parties to whom it sent**  
108 **notices of the filing for approval of the 2022AS RFP?**

109 A. Yes. PacifiCorp sent notices of the filing for approval of the 2022AS RFP to all  
110 parties identified in Exhibit RMP\_\_\_\_(HBE-3).

111 **Q. Please provide an overview of the solicitation process in the draft 2022AS RFP.**

112 A. The draft 2022AS RFP is tailored to procure renewable and non-renewable resources  
113 and battery storage consistent with the 2021 IRP preferred portfolio. Accordingly,  
114 the 2022AS RFP is seeking approximately 1,345 MWs of new proxy solar and wind  
115 resources collocated with 600 MWs of new energy storage capacity. Proposals must  
116 demonstrate that projects will achieve commercial operation no later than  
117 December 31, 2026, recognizing that long lead-time resources are eligible so long as  
118 they can demonstrate ability to achieve commercial operation by December 31, 2028.  
119 Bidders are encouraged to offer four different structures. The first is a PPA with a  
120 term up to thirty (30) years for generating resources with exclusive ownership by  
121 PacifiCorp of all capacity and environmental attributes associated with all energy  
122 generated. The Company will also include a form of PPA that contemplates a  
123 generating resource with collocated battery energy storage, and a form of PPA that  
124 contemplates a traditional generating resource only. The second is a tolling agreement  
125 where the bidder is proposing a stand-alone battery energy storage system. The third  
126 structure is a BTA where the bidder develops the project, assumes responsibility for  
127 construction, and ultimately transfers the asset to PacifiCorp before, or upon, the in-  
128 service date, in accordance with additional terms in the BTA. Finally, PacifiCorp will  
129 also accept demand-side resource bids offering a professional services agreement. As  
130 an all-source RFP, PacifiCorp recognizes that the pro forma agreements in the RFP  
131 may not fit every resource type and will consider variations of a PPA, tolling  
132 agreement, or BTA at its sole discretion, and it reserves the right to reject any non-  
133 compliant bids.

134 **Q. Does the draft 2022AS RFP provide descriptions of the proposed screening and**  
135 **evaluation criteria and the methodology, including any weighting and ranking**  
136 **factors to be used to evaluate bids, as required by Utah Admin. Code R746-420-**  
137 **3(2) and (5)?**

138 A. Yes. Section 6 (Bid Evaluation and Selection) of the draft 2022AS RFP provides a  
139 detailed description of the bid scoring, modeling and selection process including  
140 assumptions, criteria and methodology that will be used to evaluate, rank, and  
141 shortlist bids. As described in the draft 2022AS RFP, the screening and evaluation  
142 criteria meet the requirements of the Commission’s rule.

143 **Q. Does the 2022AS RFP contemplate oversight by an IE?**

144 A. Yes. The 2022AS RFP will be conducted under the oversight of an IE. In response to  
145 PacifiCorp’s notices, filed on August 21, 2021, and October 8, 2021, I understand  
146 that the Commission has already retained the IE who is responsible for evaluating  
147 and overseeing the 2022AS RFP.

148 In addition, in accordance with competitive bidding rules adopted by the  
149 Public Utility Commission of Oregon (“OPUC”) in Order 21-3451, the 2022AS RFP  
150 will be conducted under the oversight of an IE approved by the OPUC. Finally, in  
151 accordance with the purchases of resources rules for electric utilities adopted by  
152 Washington Utilities and Transportation Commission (“WUTC”) Order 01 to Docket  
153 No. UE-210779, the 2022AS RFP will be conducted under the oversight of an IE  
154 approved by the WUTC. On behalf of both the Commission, the OPUC and the  
155 WUTC, IEs will be involved in overseeing the 2022AS RFP process to ensure it is  
156 conducted fairly and properly.

157 **Q. Does the draft 2022AS RFP include Benchmark Options?**

158 A. Yes. The Company anticipates that the 2022AS RFP will include resources that are  
159 Benchmark Options, as defined by Utah Code § 54-17-102(2). The Company will  
160 propose Benchmark Options that are both Owned Benchmark Resources, where  
161 PacifiCorp owns and self-develops the resource, and Market Benchmark Resources,  
162 whereby PacifiCorp has a purchase option to acquire the resource upon selection to  
163 a final shortlist, as those terms are described in Utah Admin. Code R746-420-3(4)(a).  
164 Owned Benchmark Resources will be for property either leased by PacifiCorp or on  
165 property for which PacifiCorp has acquired development rights, whereas Market  
166 Benchmark Resources will be for property secured by a third-party market developer  
167 who may also be bidding the resource separately into the 2022AS RFP as a market  
168 bid. PacifiCorp has included a list of Benchmark Options under consideration as part  
169 of the draft RFP, including a description of the resource capacity, technology type,  
170 and location of each proposed resource.

171 PacifiCorp has proposed a schedule by which both PacifiCorp and the IE  
172 receive, score, and file all Benchmark Option scores prior to the receipt and opening  
173 of market bids. The IE will review the reasonableness of the scores for the Benchmark  
174 Options. The scores of the Benchmark Options will be assigned using the same bid  
175 scoring and evaluation criteria that will be used to score market bids. If bidder updates  
176 are allowed during the RFP, as determined by PacifiCorp, with input from the IE,  
177 PacifiCorp may update the costs and score for the Benchmark Options.

178 **Q. Will the bids be “blinded” as required under Utah Admin. Code R746-420-**  
179 **3(10)(a)?**

180 A. PacifiCorp is requesting that bids not be “blinded.” PacifiCorp is requesting a waiver  
181 of this requirement, consistent with similar requests in past RFPs. My understanding  
182 is that the Commission has approved such requests based, in part, on  
183 recommendations by the IE and the Utah Division of Public Utilities, who have  
184 questioned the value of blinding the bids in prior RFPs. As in past solicitation  
185 processes, blinding bids will provide limited value because the detailed information  
186 that will be included in each bid will effectively disclose the bidder’s identity.  
187 Therefore, blinding bids will create an administrative burden on the IE and the  
188 Company, with no commensurate value.

189 **Q. Do you believe that the 2022AS RFP is in the public interest?**

190 A. Yes. It is my understanding that Utah Code § 54-17-201(2)(c) provides that the  
191 Commission must determine that the proposed solicitation process is in the public  
192 interest, after taking into consideration the following factors:

- 193 • whether the decision will most likely result in the acquisition, production,  
194 and delivery of utility services at the lowest reasonable cost to the retail  
195 customers of the utility;
- 196 • long-term and short-term impacts;
- 197 • risk;
- 198 • reliability;
- 199 • financial impacts on the utility; and
- 200 • other factors determined by the Commission to be relevant.

201 Based on these factors, the 2022AS RFP is in the public interest. First, as described  
202 above and in the 2021 IRP, the winning resources (inclusive of energy storage) selected  
203 as a result of the 2022AS RFP will be least-cost, least-risk and will produce near- and



204 long-term customer benefits. The winning resources will be chosen out of a robust  
205 solicitation process. Second, PacifiCorp is financially capable of acquiring the winning  
206 resources. It has a variety of funding sources to finance these projects including cash  
207 from operations. PacifiCorp currently has access to the capital markets and expects to  
208 have the ability to borrow any funds necessary to help with the financing. Also,  
209 PacifiCorp has received cash equity contributions from its parent company in the past  
210 and, if necessary, may again in the future. Third, transmission system upgrades that  
211 may ultimately be necessary to support the winning resources will relieve existing  
212 congestion and will enable interconnection and integration of the proposed resources  
213 into PacifiCorp's transmission system, adding to PacifiCorp's overall system  
214 reliability. Thus, I believe that the 2022AS RFP is in the public interest and should be  
215 approved.

216 **Q. Does this conclude your direct testimony?**

217 A. Yes.

Rocky Mountain Power  
Exhibit RMP\_\_ (HBE-1)  
Docket No. 21-035-52  
Witness: Heather B. Eberhardt

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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Exhibit Accompanying Direct Testimony of Heather B. Eberhardt  
PacifiCorp's Proposed 2022 All Source Request for Proposals (2022AS RFP)

January 2022

**THIS EXHIBIT IS VOLUMINOUS  
AND IS PROVIDED  
ELECTRONICALLY**

Rocky Mountain Power  
Exhibit RMP\_\_ (HBE-2)  
Docket No. 21-035-52  
Witness: Heather B. Eberhardt

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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Exhibit Accompanying Direct Testimony of Heather B. Eberhardt

2022AS RFP Pre-Issuance Bidders Conference Presentation Held

January 11, 2022

January 2022

# PacifiCorp 2022 All-Source Request for Proposals

Pre-Issuance Bidders Conference

January 11, 2022





## Logistics

- Conference Date and Time
  - January 11, 2022
  - 1:00 – 3:00 PM (Mountain Time)
- Location
  - Microsoft Teams meeting  
Join on your computer or mobile app  
[Click here to join the meeting](#)
  - Or call in (audio only)  
Phone Number: (563) 275-5003 or 563-275-5003  
Phone Conference ID: 767 205 280#
  - [+1 563-275-5003,,767205280#](#)



## Agenda

- Purpose and Scope
- Resource Types
- Bid Structures
- Interconnection Requirements
- Proposed RFP Schedule
- Evaluation and Selection Methodology
- Role of Independent Evaluators (IEs)
- Next Steps
- Questions and Comments

## Purpose and Scope of 2022AS RFP

- Action item out of PacifiCorp's 2021 Integrated Resource Plan (IRP) established an all-source RFP in 2022 (2022AS RFP), driven by the IRP preferred portfolio, targeting approximately 1,345 megawatts (MW) of new renewable wind and solar resources, 600 MW of new co-located battery energy storage system (BESS) capacity, and 274 MW of new demand-side resources (demand response) by the end of 2026.
- Eligible bids will not be limited by location, technology or capacity; however, bidders should be cognizant of existing requests in higher positioned PacifiCorp's interconnection queues, signed interconnection agreement reservations and cluster studies.
- RFP will consider bids that can achieve commercial operation by December 31, 2026.
  - PacifiCorp will also consider bids from pumped storage hydro and nuclear resources requiring longer lead time to develop and construct so long as they can demonstrate their ability to be commercially operational by December 31, 2028.
- Proposals must be capable of interconnecting with or delivering to PacifiCorp's transmission system in its east or west balancing authority areas (PACE and PACW, respectively).
- PacifiCorp is planning to submit several self-build ownership proposals (benchmark resources).
- Two independent evaluator (IEs) have been retained by PacifiCorp on behalf of Public Utility Commission of Oregon and Washington Utilities and Transportation Commission. An IE will also be retained by Utah Public Service Commission.
- Bid fee(s) of \$15,000 will be required for each bid proposal greater than 5 MW. Bid proposals 5MW and smaller will be subject to a sliding scale bid fee of \$1,000 per MW up to \$5,000. A single free bid alternative will be allowed if bidders wish to bid an alternative diversity strategy.
- Intent to bid form and bidder credit information are requested prior to bid submittal(s).

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<u><b>Resource Types</b></u>	<b>Bid Structure Accepted</b>				
	<b>Bench- mark</b>	<b>PPA</b>	<b>Tolling Agreement</b>	<b>BTA</b>	<b>Professional Services Agreement</b>
Renewable	X	X		X	
Renewable plus Battery Storage	X	X		X	
Non-Renewable		X		X	
Standalone Battery Storage	X		X	X	
Pumped Hydro Storage / Nuclear	X	X	X	X	
Demand-side Resource / Other		X	X	X	X

- Bids will be accepted for both new and existing operating facilities.
- All renewable capacity, energy, and associated environmental attributes go to PacifiCorp.
- BTA bids MUST directly interconnect to PacifiCorp’s transmission system.
- BTA projects must be constructed to PacifiCorp specifications.

# Bid Structures

- Benchmark** transaction whereby PacifiCorp proposes to develop, construct, own and operate a bid project. Under this transaction structure, PacifiCorp will be responsible for all required development, design, equipment supply, construction, commissioning, and performance testing.
- Build-transfer** transaction whereby the bidder develops the project, assumes responsibility for construction and ultimately transfers the completed asset to PacifiCorp in accordance with the terms of a build-transfer agreement (BTA).
  - PacifiCorp will ONLY accept BTA bids that are directly interconnected to PacifiCorp's transmission system.
  - Bidder responsible for all development, design, equipment supply, construction, commissioning, and performance testing, and will be required to design and construct the resource in conformance with PacifiCorp's specifications.
  - PacifiCorp will not accommodate BTAs that involve the ultimate transfer of a project company to PacifiCorp.
- Power-purchase agreement (PPA)** requires exclusive ownership by PacifiCorp of any and all capacity and environmental attributes associated with all energy generated.
  - Renewable resources bid with collocated storage will include a \$/MW-month tolling price for the right to dispatch the battery.
  - PacifiCorp will accept PPAs with 5 to 30-year contractual term lengths. Collocated renewable resource with storage must offer the same term length for the energy storage as the renewable resource.
- Tolling agreement** requires exclusive rights by PacifiCorp to dispatch standalone storage or pumped-hydro storage on a \$/MW-month basis over the proposed 5 to 30-year term.
  - Collocated resource and battery storage must have agreements that are the same term length.
- Professional services agreement** whereby bidder offers demand-side resources to PacifiCorp.

# Interconnection and Transmission

1. Eligible bidders must have a completed interconnection study demonstrating the proposed resource's ability to reach commercial operation by December 31, 2026 as a result of:
  - Serial Queue: 5 queue positions accounting for 529 MW in capacity.<sup>1</sup>
  - LGIAs signed and not yet interconnected: 79 contractual agreements accounting for 7,253 MW in capacity.<sup>1</sup>
  - Transition Cluster Study: 23 active requests accounting for 1,588 MW in capacity.<sup>1</sup>
  - Cluster Study 1: 52 active requests accounting for 11,348 MW in capacity.<sup>1</sup>
  - Cluster Study 2: Cluster Study Window opens April 1, 2022 and closes 45 days later.<sup>1</sup>
  - Fast Track Process available to certain small generation interconnection customers
  - More information (up-to-date counts<sup>1</sup>) are available on Pac's Open Access Same-time Information System (OASIS).
  - For off-system projects, a completed system impact study from the third-party Interconnection Provider, and related sufficient transmission information (see below), demonstrating an ability to deliver firm energy to PacifiCorp at the requested point of delivery (POD).
2. Interconnection studies and agreements should be consistent with the bid proposal's technology, size, inclusion of BESS, etc.; otherwise, bidder will provide documentation from interconnection/transmission provider that a material modification to their interconnection documentation is not required.
3. On-system resources:
  - Bidders must include the Interconnection Provider's estimated direct interconnection cost in their bid price and provide the Interconnection Provider's estimated cost of network upgrades to PacifiCorp for consideration in the portfolio optimization models
  - Bidders are requested to have their interconnection requests studied by the Interconnection Provider for both network resource interconnection service (NRIS) and energy resource interconnection service (ERIS) as part of their interconnection study.
4. Off-system resources:
  - Bidders must provide evidence of availability of firm point-to-point transmission from the off-system point of interconnection (POI) to the requested POD on PAC's system and include wheeling costs in their bid price.

7 <sup>1</sup> The OASIS queue, LGIA and cluster study counts are as of December 28, 2021 and are all subject to change. **POWERING YOUR GREATNESS**

# Proposed RFP Schedule

Milestone	Date
2022AS RFP Issued to market	04/26/2022
First Bidder's Conference	05/06/2022
PacifiCorp Cluster Request Window closes – PacifiCorp OATT Section 39.2.1	05/16/2022
Notice of Intent to Bid due	06/16/2022
Demand-side targeted RFP Issued to Market	Q3 2022
Second Bidder's Conference	10/20/2022
Cluster study results posted to OASIS / bidders notified by PacifiCorp Transmission	11/12/2022
Benchmark bids due	11/21/2022
RFP bids due from market	01/16/2023
PacifiCorp and IE review of bid eligibility screening complete	02/22/2023
PacifiCorp completes bid preparation and provides supply-side and demand-side bid inputs to PLEXOS portfolio optimization modeling team	02/23/2023
Capacity factor and BESS evaluation of bids completed	02/23/2023
PacifiCorp completes due diligence and non-price scoring	03/15/2023
PLEXOS generates price score and list of preferred new resources	04/14/2023
PacifiCorp and IE review of FSL recommendation complete	05/05/2023
Execute contractual agreements	11/21/2023
Bid validity date	11/21/2023
Winning bid Guaranteed Commercial Operations Date	12/31/2026

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## Evaluation and Selection Criteria

PacifiCorp will evaluate proposals based on the following:

1. Conformance with the RFP minimum eligibility requirements.
2. Cost to customers, determined by PacifiCorp's portfolio optimization model (PLEXOS) associated with the bid submission.
3. Deliverability – or viability – of the resource including: ability to interconnect by the proposed COD, site control, development maturity (status of site studies (geotechnical/cultural/environmental/avian/wildlife/fish), permitting status, developer's experience, procurement and supply chain plan strategies, and demonstration that the project's COD will be achieved by December 31, 2026, or in the case of long-lead resources, the ability to issue notice to proceed for construction by 2023 and reach commercial operation by 2028.
4. Transmission access and interconnection status in conformance with RFP requirements.
5. Technical design, feasibility, and compliance with defined RFP specifications.
6. Ability to provide acceptable credit security as determined by bidder's credit information.
7. Conformance with the terms and conditions in the pro forma contracts including the PPA, BTA, tolling agreement, and professional services contract as applicable to the individual bid submissions.



## **Evaluation and Selection Process Steps**

1. PacifiCorp Transmission posts interconnection cluster study results
2. Benchmark bid deadline for PacifiCorp and affiliate bids.
3. Evaluation and scoring of Benchmark bids with IE review.
4. Deadline for Market bids: PPA, BTA, Tolls, professional service agreements.
5. Eligibility determination: conformance to minimum requirements in RFP.
6. Input review:
  - a. Third-party engineer review of resource production and energy storage estimates.
  - b. Bid Preparation excel file prepares modeling inputs for PLEXOS and aligns bidder production estimates with modeled renewable output and load.
  - c. Due diligence to determine non-price score (up to 25 points).
7. Portfolio Modeling: PLEXOS selects portfolio of resources and provides price score inputs (up to 75 points), which are combined with non-price scores (up to 25 points).
8. Compare bid ranking to PLEXOS preferred resources and run additional PLEXOS iterations as needed to determine the final shortlist.
9. State compliance analysis.
10. Final shortlist notification by PacifiCorp.

# Non-Price Scoring

Non-Price Score Attribute	Points
Bid Submittal Completeness	5
Contracting Progress and Viability	5
Project Readiness and Deliverability	15
<b>Total Score</b>	<b>25</b>

## Consistent with OR 860-089-0400(2):

- Non-price factors converted to price factors where practicable.
- Non-price scores primarily relate to resource characteristics identified in 2021 IRP Action Plan and reflect standard form contracts.
- Criteria is objective and reasonably subject to self-scoring.
- Criteria which seek to identify minimum thresholds bid have been converted into minimum bidder requirements.

- Bid Completeness:
  - Bid submittals are thorough, comprehensive and consistent.
- Contracting Progress and Viability:
  - Ability to contract with the resource on terms and conditions consistent with the bid and the proforma agreements included in the RFP.
- Project Readiness and Deliverability:
  - Development status and maturity.
  - Viability with respect to site control, studies and entitlements (permits etc.), equipment and construction sourcing strategy, and other development and operational characteristics.
  - Likelihood of achieving commercial operation by December 31, 2026 (or 2028 for long-lead resources).

## Price Proposal – Bidder Inputs

Each Proposal is required to include a completed Appendix C-2, which provides PacifiCorp a “numbers based” overview of the bid offering:

Appendix C-2 Inputs – Required for Bid Submittal		Location
Project Input Data		Tab 1
A forecasted p50 first year 8760 generation profile (not including any storage/battery charging or discharging) including annual generation degradation		Tab 2
PPA Pricing <sup>1</sup> for each year		Tab 3
Storage/battery pricing and operational requirements: <ul style="list-style-type: none"> <li>▪ Rated Storage Capacity (augmented)</li> <li>▪ Storage Duration</li> <li>▪ Full Cycle Charges per Day</li> <li>▪ Calendar Year Degradation</li> <li>▪ Calendar Year Efficiency Degradation</li> <li>▪ Storage Ramp Rate</li> </ul>		Tab 4
Pump Storage Hydro (PSH) Pricing & Operations		Tab 5
BTA or Benchmark Pricing		Tab 6
Other bidder supplied information		Tab 10
<i>Not in use</i>		Tabs 7-9

<sup>1</sup>Bid prices are inclusive of direct interconnection costs. PacifiCorp separately includes the network upgrades from the interconnection studies in bid preparation model for use by PLEXOS to determine price scoring.



## Eligibility and Bid Input Requirements for Energy Storage

- Energy storage evaluated as to “toll” or “call option” to PacifiCorp
  - Pricing: \$/kW-month for right to charge and discharge (dispatch) the storage facility.
  - Bidders may not charge or discharge the storage facility without PacifiCorp’s approval.
  - Bidder must be able to follow four second Automated Generator Control (AGC) signal.
  - Bidders must contract separately with local electric provider for station service and auxiliary load.
- Collocated battery energy storage system (BESS) specifications
  - BESS must be AC coupled.
  - Collocated bids must be 50% or greater than generating resource with same term as generating resource. 50%, 75%, 100% bids accepted.
  - PacifiCorp understands most bidders will specify that battery is charged during first five years from collocated renewable generation due to federal tax incentive recapture risk.
  - PacifiCorp requests collocated batteries are designed with ability to grid charge after recapture period.
- Rated capacity
  - Must be consistent with interconnection study, or else have documentation from PacifiCorp Transmission that no material modification is required.
  - Lithium-based battery bids must assume and price-in augmentation to maintain capacity and duration throughout contract life and specify:
    - Round trip efficiency.
    - Allowable full charge cycles.
    - Annual degradation schedule.
    - Other technologies must maintain original capability of proposed storage resource.
- Storage Duration
  - Minimum of four (4) hours duration accepted.
- Long lead-time pumped hydro storage bids must demonstrate ability to be online by December 31, 2028.

# Price Scoring and Final Shortlist Determination

1. PLEXOS Upload of Bid Preparation Excel File Inputs
2. PLEXOS Modeling:
  - Recommends a least-cost, least-risk portfolio of new resources.
  - Provides a numeric net system benefit (value in dollars) for each bid evaluated, which will be used to establish a price score.
  - Runs sensitivities related to portfolio reliability, cost/risk, state-specific compliance.
3. Total Scoring and Ranking:
  - PLEXOS-based Price Scores (0-75 points) are added to Non-Price score for each bid (0-25 points) to yield a Total Score (0-100 points) for each bid. Total scores are then used to rank bids for final shortlist.
4. Final Shortlist Determination:
  - Should the top ranked bids conform with the PLEXOS portfolio of preferred new resources, then the final shortlist will be established.
  - If the bid ranking (inclusive of non-price scores) is inconsistent with the PLEXOS portfolio of preferred new resources, then PacifiCorp in coordination with the IEs may identify bid resources to add or subtract PLEXOS' recommended portfolio. PacifiCorp's Resource Planning team may test different iterations for system stability and reliability until it determines a final recommended portfolio of new resources consistent with both non-price scores and the PLEXOS portfolio optimization model.
  - Following the determination of the final shortlist, in coordination with the IEs, PacifiCorp will check for compliance with state regulations and may run state-specific sensitivities.



## **Role of the Independent Evaluator (IE)**

1. Consistent with R746-420-6 Functions of Independent Evaluator.
2. Review draft RFP document and stakeholder comments to facilitate final RFP for commission approval.
3. Review and validate the bid submittals and non-conforming bid decisions.
4. Facilitate and monitor communications between PacifiCorp and bidders.
5. Analyze, operate and validate models, assumptions and inputs used in the RFP process, including the evaluation of bids relative to price and non-price scoring.
6. Ensure that all the bids are treated in a fair and non-discriminatory manner.
7. Monitor, observe, validate and offer feedback to PacifiCorp and the state regulatory commissions (Oregon, Washington and Utah).
8. Solicit additional information on bids necessary for screening and evaluation purposes.
9. Perform other evaluations and tasks as directed by state regulatory commissions (Oregon HB2021 or Washington CETA, for example).

There will be three IEs overseeing the 2022AS RFP (Oregon, Washington and Utah).

## Independent Evaluators

State	Independent Evaluator	Contact Email
Oregon	PA Consulting Group, Inc.	2022as_ie@paconsulting.com
Utah	TBD	TBD
Washington	Bates White, LLC	frank.mossburg@bateswhite.com

# Next Steps

## 1. Schedule for Approval of 2022AS RFP

Regulatory Schedule	Date
Final draft RFP was filed in Washington	12-29-2021
Final draft RFP to be filed in Oregon	01-14-2022
Final draft RFP to be filed in Utah	01-26-2022
PacifiCorp Transmission Cluster Request Window opens	05-16-2022
Commission approvals in three states	04-11-2022
RFP issued to market	04-26-2022
PacifiCorp Transmission Cluster Request Window closes	05-16-2022

2. Upon filing its RFP Application, PacifiCorp will notify its bidders list of the docket number. Per Utah Admin. Code 746-420 (4) (a) stakeholders and interested parties may file comments with the Utah Commission within 45 days after the filing of the Application.
3. Questions or comments regarding this pre-issuance bidders' conference should be sent to the following mailbox, even if an answer was provided verbally in today's meeting, to ensure all Bidders receive responses: [2022AS\\_RFP@pacificorp.com](mailto:2022AS_RFP@pacificorp.com)
4. Responses to questions received by January 20, 2022 will be posted on PacifiCorp's 2022AS RFP website by January 24, 2022.
5. 2022AS RFP information will be provided at [www.pacificorp.com](http://www.pacificorp.com), as information is developed. From website main page, go to Suppliers, then RFPs, then 2022AS RFP. <https://www.pacificorp.com/suppliers/rfps/2022-all-source-rfp.html>



# Supporting Materials

## PacifiCorp 2021 IRP Preferred Portfolio Selections

Project Name	Type	Location	Resource Size (MW)	Battery Size (MW)	Expected Online
Portland/N. Coast	Wind	NW Oregon	130	n/a	2025
Willamette	Wind	NW Oregon	615	n/a	2025
Borah Hemingway	Solar with Battery	Idaho	600	600	2025

- 1,345 MW new renewable generating resources, 600 MW energy storage resources enabled by area reinforcements and new transmission projects.

Year	Resource(s)	From	To	Description
2025	1,641 MW RFP Wind (2025)	Aeolus WY	Clover	Enables 1,930 MW of interconnection with 1700 MW of TTC; Energy Gateway South
2026	615 MW Wind (2026)	Within Willamette Valley OR Transmission Area		Enables 615 MW of interconnection; Albany OR area reinforcement
2026	130 MW Wind (2026)	Portland North Coast	Willamette Valley	Enables 2080 MW of interconnection with 1950 MW TTC; Portland Coast area reinforcement, Willamette Valley and Southern Oregon
	450 MW Wind (2032)		Southern Oregon	
	650 MW Battery (2037)			
2026	600 MW Solar-Storage (2026)	Borah-Populous	Hemingway	Enables 600 MW of interconnection with 600 MW of TTC; B2H Boardman-Hemingway

# PacifiCorp Transmission OASIS Interconnection Requests and Queues



Serial Queue	<a href="https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaq.htm">https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaq.htm</a>
Archive - Executed IA - Not in Service	<a href="https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaqenis.htm">https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaqenis.htm</a>
Transition Cluster	<a href="https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaq.htm">https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaq.htm</a>
Cluster Study 1	<a href="https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaq1.htm">https://www.oasis.oati.com/woa/docs/PPW/PPWdocs/pacifiorp giaq1.htm</a>



# Anticipated RFP Requirements

Main RFP Document	Informational
Appendix A-Q Umbrella Document	Both information and required. Includes (umbrella document for) appendices listed below.
App A-1 Technical Specifications (Wind, Solar, Storage, HV)	Required of BTAs, as applicable
App A-2 Interconnection Studies and Agreements	Required of all bids
App A-3 Permitting Matrix	Required of all bids
App A-4 Safety Requirements	Required of BTAs
App A-5 Project Single-Line Drawing and Layouts	Required of all bids
App A-6 Division of Responsibility	Required of BTAs
App A-7 General Owner Technical Specifications	Required of BTAs
App A-8 Real Estate Specifications	Required of BTAs
App A-9 Equipment Supply Matrix	Required of all bids
App A-10 Plant Performance Guarantee	Required of BTAs
App B-1 Notice of Intent to Bid	Requested of all bids
App B-2 Bid Proposal Instructions and Required Information	Required of all bids
App C-1 Bid Summary and Pricing Input Sheet Instructions	Informational
App C-2 Bid Summary and Pricing Input Sheet	Required of all bids
App C-3 Energy Performance Report	Required of all bids
Appendix D Bidder's Credit Information	Required of all bidders

## Anticipated RFP Requirements Continued

App E-1 PPA and Tolling Agreement Instructions	Informational
Appendix E-2 PPA Documents	Required of PPA bidders, as applicable
App E-3 Tolling Agreement Document	Required of Tolling Agreement bidders
App F-1 BTA Instructions	Informational
App F-2 BTA Documents	Required of BTAs
App G-1 Confidentiality Agreement	Required of all bidders
App G-2 Non-Reliance Letter	Informational (Required at final shortlist)
App H-1 2021 IRP Preferred Portfolio Transmission Upgrade Selections	Informational
App H-2 2021 PacifiCorp IRP Preferred Portfolio Proxy Resource Selections	Informational
App H-3 PacifiCorp Transmission: Summary of OASIS queue positions	Informational
App I Standards of Conduct; Separation of Functions	Informational
App J PacifiCorp Transmission Waiver	Requested of all bidders
App K Operations and Maintenance Services Agreement	Required of BTAs
App L Non-Price Scoring Matrix	Required of all bidders
App M Role of the Independent Evaluator	Informational
App N PacifiCorp's Organization for RFP Process	Informational
App O PacifiCorp's Company Alternative (Benchmark Resource)	Required of all bidders
App P Equity Questionnaire	Requested of all bidders
App Q 2021 Demand Response RFP – Requirements for Demand-side Bids	Informational
App Q-1 Professional Services Contract, including scope of work, etc.	Required of all demand-side bidders

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# Proposed RFP Regulatory Schedule

Circulate draft RFP to Oregon stakeholders	OR Docket	12/28/2021	
File final draft RFP with WA Commission	WA Docket	12/29/2021	WAC 480-107-017 (1)
Oregon workshop with IE stakeholders on RFP draft	OR Docket	01/07/2022	OR 860-089-0250 (1)
Pre-issuance bidders conference	UT Docket	01/11/2022	UT R746-420-1 (3)(b)
File final draft RFP with OR Commission	OR Docket	01/14/2022	
File final RFP application for UT	UT Docket	01/26/2022	
Oregon party comments on final draft RFP	OR Docket	02/11/2022	
RFP comments due from WA interested persons	WA Docket	02/14/2022	WAC 480-107-017 (3)
PacifiCorp reply comments on final draft RFP	OR Docket	02/25/2022	
Oregon IE files report on final draft RFP	OR Docket	03/04/2022	OR 860-090-0450 (3)
WA Commission approval of RFP	WA Docket	03/10/2022	WAC 480-107-017 (4)
UT stakeholder party comments on RFP draft	UT Docket	03/14/2022	UT R746-420-1 (4)(a)
UT IE comments on RFP due	UT Docket	03/22/2022	UT R746-420-1 (4)(a)
PacifiCorp comments on RFP due	UT Docket	03/22/2022	UT R746-420-1 (4)(a)
Oregon Commission Staff files memo on RFP	OR Docket	03/29/2022	
All party / PacifiCorp's reply comments due	UT Docket	04/01/2022	UT R746-420-1 (4)(a)
PacifiCorp OATT - Cluster Request Window opens	OATT	04/01/2022	OV11 Section 39.2.1
OR Commission Special Public Meeting approving RFP	OR Docket	04/07/2022	OR 860-089-0250 (6)
WA Procurement Rules - Deadline for issuing RFP	WA Docket	04/09/2022	WAC 480-107-017 (5)
UT Commission decision on RFP	UT Docket	04/11/2022	UT R746-420-1 (4)(a)
RFP Issued to market	2022 AS RFP	04/26/2022	
PacifiCorp OATT - Cluster Request Window closes	OATT	05/16/2022	OV11 Section 39.2.1

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# Question & Comments



Rocky Mountain Power  
Exhibit RMP\_\_ (HBE-3)  
Docket No. 21-035-52  
Witness: Heather B. Eberhardt

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

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Exhibit Accompanying Direct Testimony of Heather B. Eberhardt

2022AS RFP Bidder and Interested Party Email Contact List

January 2022

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