



Clean Energy Plan (CEP) Engagement Series

August 2025 Meeting Notes

Wednesday, August 20, 2025, 9:00 - 12:00 pm Pacific Time

These notes were synthesized and summarized by E Source, PacifiCorp's meeting facilitation partner.

Executive Summary

There were 54 people in attendance, including members of the public and PacifiCorp representatives, at the third iteration of the Clean Energy Plan Engagement Series meeting this year. The virtual meeting, which was hosted via the Zoom platform, aims to provide an integrated lens on clean energy planning with expanded learning opportunities to foster a deeper understanding of programs and outreach while gathering public input.

To maximize accessibility, the meeting was recorded for those who could not attend and Spanish and ASL interpretation/translation were provided.

The following is a summary of the content and feedback received during the 3-hour public meeting.

Purpose

PacifiCorp's Oregon Clean Energy Plan Engagement Series provides a space for joint consultation among various Oregon interested parties and members of the public. Participants have the opportunity to provide input on PacifiCorp's developing Clean Energy Plan (CEP), CEP process, as well as other supporting topics. This addition aims to help foster shared understanding of complex clean energy planning topics as well as provide pathways for meaningful engagement and input.

Policy Updates

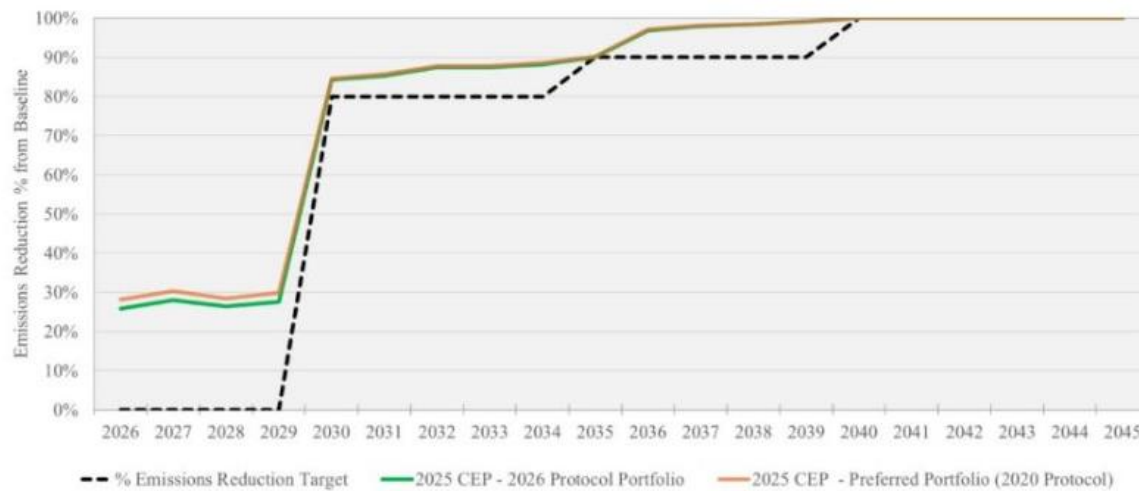
Dr. Rohini Ghosh, Director of Clean Energy Planning, highlighted recent policy updates including the One Big Beautiful Bill Act, a commission notice, and Docket UM 2401. On July 4, 2025, the One Big Beautiful Bill Act was passed, causing impact to costs and benefits of certain renewable and storage resources. This new federal tax policy shifts previous assumptions, changes tax credits and qualifications, and increases uncertainty and risk. For example, while preparing the 2025 IRP and CEP, PacifiCorp operated under current laws that included federal tax credits for new renewable or non-emitting resources which are now outdated. The OBBBA phases out and repeals tax credits, meaning there is a narrow window of time in which new projects can qualify, and new Foreign Entity of Concern (FEOC) restrictions could potentially further limit the ability for a project to qualify. During the preparation of the 2025 CEP,

PacifiCorp ran a sensitivity where the proxy resources selected in the preferred portfolio did not qualify for any new tax credits – increasing Oregon-allocated costs by over \$7 billion over the 21-year planning horizon.

On May 27, 2025, Oregon Public Utility Commission of Oregon gave notice that the Commission was seeking comments on a draft order prepared by the Administrative Hearings Division addressing the cost cap provisions set forth in Section 10 of House Bill 2021. The Commission identified key issues to address, asked for input on development of a “counterfactual portfolio” and proposed a hypothetical scenario. Key issues identified include investments and costs eligible for cost cap inclusion, forecasted costs, interaction with Renewable Portfolio Standard (RPS) cost cap, and time period for cost cap application. PacifiCorp and other parties submitted comments on August 12, 2025.

On July 1, 2025, PacifiCorp filed an application for approval of the 2026 Inter-Jurisdictional Allocation Protocol (2026 Protocol) in [Docket UM 2401](#). If approved, the 2026 Protocol will replace the expiring 2020 Protocol as the multi-state cost allocation methodology applied to allocating resource costs and benefits for Oregon rate-making, realign resources in light of state disallowances of carbon costs, comply with Oregon state law (and other states’ laws), and set the stage for future costs allocation changes that support diverging state policies. From a planning perspective the 2026 Protocol is expected to drive minimal changes to Oregon’s forecast of allocated capacity and energy and is not expected to impact 2030 compliance with HB 2021’s greenhouse gas reduction targets.

The graph below illustrates the percentage of greenhouse gas emissions reductions from baseline defined under HB2021 per the 2026 Protocol. This change does not disrupt the current planning trajectory nor what the company is seeking in the RFP.



Meeting Discussion

- Nick Pappas, Renewable Northwest, expressed concern that the framing around the MSP and 2026 Protocol seems very disconnected from the IRP docket. Is it correct that the 2025 IRP seeks to build on the existing MSP, which then builds on the 2026 Protocol, which also builds on the MSP?
 - While Mr. Pappa’s understanding is correct, Dr. Ghosh clarified that the 2025 IRP and CEP used a new process around the jurisdictional portfolios and integration process. The approach is built upon what is allowed by the existing 2020 Protocol and will flow into the 2026 Protocol which designates resources as either a system resource or state specific, which was set up by the 2020 Protocol and adopted by the 2026 Protocol. In the 2025 IRP process, through the jurisdictional portfolio integration process, the team has realized that there is no way to meet six different sets of state obligations and share all the resources when the boundaries are very different. So, the current allocation allows PacifiCorp to clearly delineate a resource as serving everyone or serving one specific state need. The IRP only allocates resources as system or SITUS with all new resources as SITUS, which is the basis of the 2026 Protocol.
 - Mr. Pappas added that it can be a bit controversial to say the IRP and 2026 Protocol follow the precedent in the MSP for those who participate in the IRP process where reliability and energy costs are allocated as SITUS and do not seem to be policy driven based on the transmission constraint.
 - Samuel Zacharia, Resource Planning and Valuation Analyst, noted that the IRP team has seen similar concerns in the comments of LC-85 and are working to address those in reply comments.
 - Dr. Ghosh pointed out that the 2026 protocol is not reshaping the current cost allocation protocol. However, the successor cost allocation methodology is likely going

to look different as a result of the reality of meeting state objectives, and the IRP will follow suit to align with the allocation protocol.

- Tim Lynch, Multnomah County Office of Sustainability, asked of the resources needed to meet 2030 compliance, what percentage is resource reallocations from existing projects and about what percent will be from new builds?
 - Dr. Ghosh explained that this approach is built on all new resources optimized for each jurisdiction. For Oregon’s jurisdictional need, per the 2020 Protocol, there is no change to the existing resource mix except for getting out of coal as required by law. All new capacity and energy needed to ensure emissions decrease will be filled by new resources. The IRP is not the appropriate place to determine whether resources should or should not be reallocated, however, in the last CEP cycle, the team proposed reducing Oregon’s share of emitting resources.

2025 Clean Energy Plan

Kimberly Alejandro, Regulatory Manager of Clean Energy Planning, shared regulatory updates on the 2025 CEP filing. On June 30, 2025, PacifiCorp filed its 2025 Clean Energy Plan with the Public Utility Commission of Oregon in [Docket LC-85](#). PacifiCorp’s 2025 Clean Energy Plan includes a near-term set of action items, a plan to reach near-term greenhouse gas emission reductions targets, and a discussion of key considerations regarding the longer-term compliance trajectory. There are potentially significant operational and financial impacts and risks associated with compliance over the next two decades.

PacifiCorp provided an informational presentation of its recently filed 2025 Clean Energy Plan to the Public Utility Commission of Oregon at the July 8, 2025, [Regular Public Meeting](#).

The timeline of Docket LC-85 is as follows:

- March 31, 2025: PacifiCorp 2025 Integrated Resource Plan filed
- Tuesday, April 15, 2025: PacifiCorp presentation to the Commission
- Monday, June 30, 2025: PacifiCorp 2025 Clean Energy Plan filed
- Tuesday, July 8, 2025: PacifiCorp 2025 Clean Energy Plan presentation
- Tuesday, July 29, 2025: Staff & Parties Opening Comments
- Tuesday, August 26, 2025: Utility reply comments
- Thursday, October 9, 2025: Staff & Parties Round 2 Comments
- Thursday, October 16, 2025: Special Public Meeting for Commission Workshop
- Thursday, November 6, 2025: Utility Round 2 Reply Comments
- Tuesday, December 23, 2025: Staff Report / Memo filed
- Monday, January 26, 2026: All Parties' Comments on Staff Report filed
- Thursday, February 5, 2026: Special Public Meeting for feedback and Commissioner discussion
- Thursday, February 12, 2026: Special Public Meeting for Acknowledgement Decision

Interested parties can use this link to follow the procedural schedule: [lc85hao336392026.pdf](#).

PacifiCorp’s 2025 Clean Energy Plan covers continual progress, community engagement, community benefit indicators, resiliency, community based renewable energy, resource planning, resources, costs, emissions reductions, and an action plan.

Key findings of the 2025 CEP include:

- To meet ambitious HB 2021 decarbonization targets, the 2025 CEP preferred portfolio includes 11,837 megawatts (MW) of new proxy resources to serve Oregon over the 21-year planning period, including: 2,491 MW of wind; 2,152 MW of utility-scale solar; 1,032 MW of small-scale solar; 3,835 MW of storage resources; 2,045 MW of energy efficiency; and 153 MW of demand response.
- In the near-term, Oregon will require 153 MW of new renewable resources and 186 MW of storage resources before 2030. Between 2030 and 2034, there is an additional need of 2,694 MW of new utility-scale renewable resources, 326 MW of new small-scale renewables and 757 MW of new storage resources.
- In 2030, there is an additional need of 146 MW of small-scale renewables to meet the SSR mandate. By 2045, this need grows to 339 MW.
- The CEP preferred portfolio forecasts Oregon-allocated greenhouse gas emissions to fall 84.6 percent from baseline levels by 2030, 90.2 percent by 2035 and 100 percent by 2040.
- If compliance with HB 2021 requires Oregon load to be served on an hourly, as opposed to annual basis, Oregon might require an additional 12 GW of non-emitting and storage resources over the planning horizon to comply with HB 2021.
- Depending on whether compliance is measured annually or hourly, Oregon’s HB 2021 greenhouse gas emissions reductions targets could, conservatively, cost between \$14.63 and \$45.59 billion over the next two decades. Federal tax credits for renewables and storage resources are eliminated, or a change is made to how incremental transmission resources are allocated to Oregon customers, these costs could increase substantially.

The table below captures average annual nominal costs (shown in millions) over the 21-year planning horizon, averaged over 21 years to indicate what annual impacts to revenue requirement could look like.

	Annual Cost with System Transmission	Annual Cost with Situs Transmission	Annual Cost with System Transmission (No PTCs/ITCs)	Annual Cost with Situs Transmission (No PTCs/ITCs)
CEP Preferred Portfolio (Annual Clean)	\$135 (10%)	\$161 (11%)	\$214 (12%)	\$241 (14%)
Hourly Clean Portfolio	\$1,609 (91%)	\$1,800 (101%)	\$2,287 (129%)	\$2,479 (140%)

\$135 million is based off the resource selections for Oregon in the CEP preferred portfolio and is considered incremental under HB 2021. Please note that instead of present value, nominal costs are used to better understand what the actual rate impact will look like. For reference, \$135 million is about 10% of the current Oregon revenue requirement which exceeds the 6% cost cap prescribed by Section 10 of HB 2021. The annual cost with SITUS transmission would be \$161 million if additional transmission lines are added, without tax credits this increases to \$241 million. The annual cost with system transmission without tax credits is estimated to be \$214 million.

Meeting Discussion

- Nick Pappas, Renewable Northwest, asked for more clarity on the counterfactual portfolio. There seems to be a large resource gap for Oregon with or without policy constraints given the upcoming RAP requirements and limitations on market purchases for a liability.
 - Dr. Ghosh noted that the only difference between the preferred portfolio and the counterfactual is the assumption that there are greenhouse gas reduction goals. Additionally, the counterfactual includes the exit from coal-fired resources, RPS small scale renewable, and resource adequacy requirements.
 - Mr. Zacharia linked Figure 11 on page 78 of the 2025 CEP which compares resource selection between the CEP preferred portfolio and HB 2021 counterfactual: [2025 Oregon Clean Energy Plan.pdf](#).
 - Mr. Pappas is curious if the counterfactual builds new gas in Oregon or if it assumes there are cost effective merchant resources to meet the reliability requirements.
 - Dr. Ghosh explained that the counterfactual is slightly limiting as PacifiCorp does not have the ability to build new gas for the west side.
 - Mr. Pappas would like a similar graphic for 2030. A large distinction between now and 2030 is that the displacement of key resources is much higher than in the future.
- Benedikt Springer, Oregon Public Utilities Commission, questioned what exactly is different in the counterfactual? If PacifiCorp is not building any different resources, where does that energy come from?
 - Mr. Zacharia explained that in the CEP preferred portfolio, it is assumed that PacifiCorp has to meet all the compliance targets set by HB 2021, on the contrary, the counterfactual, does not make this assumption. Without this assumption, there is still energy in the portfolio and there are still resource additions to make Oregon WRAP compliant. Some of the additional resources that would be needed to ensure PacifiCorp reaches the 80% emissions reduction target are not added.
 - Mr. Springer asked if it is a fair assumption that this would come down to how much the gas plants run.
 - Mr. Zacharia added that there are lots of resources that are in the portfolio that are being added. When thinking about HB 2021 compliance, it matters which resources are Oregon allocated, however, in terms of serving the load in the portfolio, any resources can serve the load.

- Jim Himelic, First Principles, asked if it is fair to assume that between now and 2030, the cost premiums are small? If the system has a reliability need and cannot build gas, what else is it building if it is not selecting non-emitting resources? Can the chart above be broken out by key HB 2021 milestone year?
 - Mr. Zacharia explained that if a resource is built in 2030, the costs are levelized over time so while it is possible to break out the chart, it will require altering the portfolio to only include resources built before 2031. Additionally, the CEP portfolio is allowed to select any resources deemed economic to serve WRAP, while those selections are locked, the portfolio does not allow any gas resources.
 - Mr. Himelic asked for additional clarification on the counterfactual as it sounds like in the CEP, the reliability costs are being assigned to Oregon and not system wide.
 - Mr. Zacharia further explained the WRAP Oregon constraint as an indication that each state will still have to pay for some amount of resources that corresponds to the demand that their load places on the system. More details will be available in LC-85.
- Nick Pappas requested more clarity on how energy gaps are getting filled if gas is not being built. It has been implied that the counterfactual does not include the physical transmission constraint and that resources on the east side were not pursued even though they could potentially serve the significant energy gap on the west side.
 - Mr. Zacharia replied that some have conflated the specific requirement that new proxy resources built for Oregon and Washington energy compliance have to be built on the west and the question of which resource serves the load on the west. It is also important to remember that the portfolio already has over a GW of resources that are built on the west because of Washington. In the absence of compliance, there are still a lot of new resources being built on the west, HB 2021 just requires more than would otherwise be built.
 - Mr. Pappas noted that his question was about the limitation on what market purchases may be available in the west and the fact that many of the resources are likely energy limited, meaning there is significant need for energy generation in the west. In the IRP, that energy need is met through new clean energy resources which are non-emitting that are then tagged as HB 2021 driven costs. The concern is that a similar conflation is happening in the CEP.
 - Mr. Zacharia reiterated that the IRP and CEP models have a significant volume of market purchases that are available in the west in every hour except for peak hours on the top five load days in summer months. In the model, there are market purchases that can be used. Using the UIWC jurisdictional portfolio as an example, that portfolio does not have any drivers to build resources on the west for Oregon and Washington compliance. This portfolio shows what the model thinks is needed to build a reliable system on the west. Then, Oregon and Washington needs are layered on top.

Dr. Ghosh highlighted the continual progress the 2025 CEP will take to reduce the greenhouse gas emissions allocated to Oregon customers and to progress towards HB 2021. In 2024, PacifiCorp has reduced emissions by 18.68% from the HB 2021-defined baseline. PacifiCorp has brought online or contracted 6.263 GW of HB-2021 supporting resources since 2019, contributing to actual and planned reductions in emissions. PacifiCorp’s 2025 Oregon-situs request for proposals (RFP) and 2025 SSR RFP are the first steps to begin procuring these resources. PacifiCorp plans to evaluate opportunities to accelerate procurement of resources identified in the preferred portfolio in 2030 when evaluating proposals from both resource solicitations.

The chart below details past and current emissions trajectory. Please note that there are different categories because prior to HB 2021, the emissions reporting methodology to the Department of Environmental Quality looked different than the current methodology.

Year	Non-HB 2021 Emissions (MTCO _{2e})	HB 2021 Emissions (MTCO _{2e})	HB 2021 Emissions (% Reduction from Baseline)
2010	9,248,689		
2011	8,880,884		
2012	9,137,084		
2013	9,626,625		
2014	9,582,985		
2015	9,701,719		
2016	8,422,662		
2017	8,628,965		
2018	8,696,220		
2019	9,042,557		
2020	8,433,448		
2021	8,257,701		
2022	7,953,132	7,851,150	12.71
2023	7,653,943	7,570,127	15.84
2024*	7,318,603	7,314,573	18.68

*Preliminary estimates, subject to additional verification and review during the annual agency emissions reporting and verification processes.

Meeting Discussion

- Jim Himelic asked if the solar selected in the Oregon IRP is getting removed in the CEP? Also, there is an incremental 500 megawatts of wind added on top of the 900 megawatts that was selected in the IRP, which is an 80% emission reduction by 2030.
 - Dr. Ghosh informed the group that this question will be answered shortly in the upcoming slides.

PacifiCorp submitted a report on CEP engagement in [docket LC-82](#) at the end of 2024. This report serves as a guide to show past efforts and to stir future planning. Community engagement will continue to foster a greater understanding of our communities and how we serve them. PacifiCorp's engagement opportunities include:

- Community Benefits and Impacts Advisory Group (CBIAG)
- Tribal Nations Community and Impacts Advisory Group (TN CBIAG)
- Clean Energy Plan (CEP) Engagement Series
- Integrated Resource Planning Public-Input Meetings
- Distribution System Planning (DSP) Workshops
- Transportation Electrification (TE) Engagement

Building from the 2023 CEP and the proposed interim CBIs, PacifiCorp proposed an updated CBI framework in its 2025 CEP that includes 14 CBIs and 18 metrics categorized under one of four categories, each of which are in alignment with the broader concept of energy equity:

- Resilience (System & Community)
- Health and Community Well-Being
- Environmental Impacts
- Economic Impacts

In the 2025 CEP, PacifiCorp developed and presented baseline metrics in the CEP and supporting work papers for all its CBIs, utilizing internal data and data from reliable external sources such as the American Community Survey (ACS), National Risk Index (NRI), and CDC PLACES. PacifiCorp also included a preliminary discussion on an environmental justice community framework to geographically define environmental justice communities in its service area at the census tract level. The framework is a work in progress and expected to be complete by the time the company files its 2027 CEP. The group can expect updates in November 2025.

Meeting Discussion

- Kate Ayres, Oregon Public Utility Commission, asked for a description on how the adjustments to the CBIs have affected the action plan for the CEP?
 - Dr. Ghosh explained that the team is still thinking about that. The CBI framework and metrics were adjusted based on what PacifiCorp can track and have impacts. There are

still a few CBIs flagged that are hard to measure and drive. On the contrary, there are some obvious areas in which the CBIs and metrics are already being utilized and will impact the 2025 Oregon Situs and small-scale RFPs.

- Cara Glennon-Olsen, CBI Advisor, added that there is only so much PacifiCorp can influence as a business, partners make their own decisions, that are out of the company's control.

The current CBI framework is as follows:

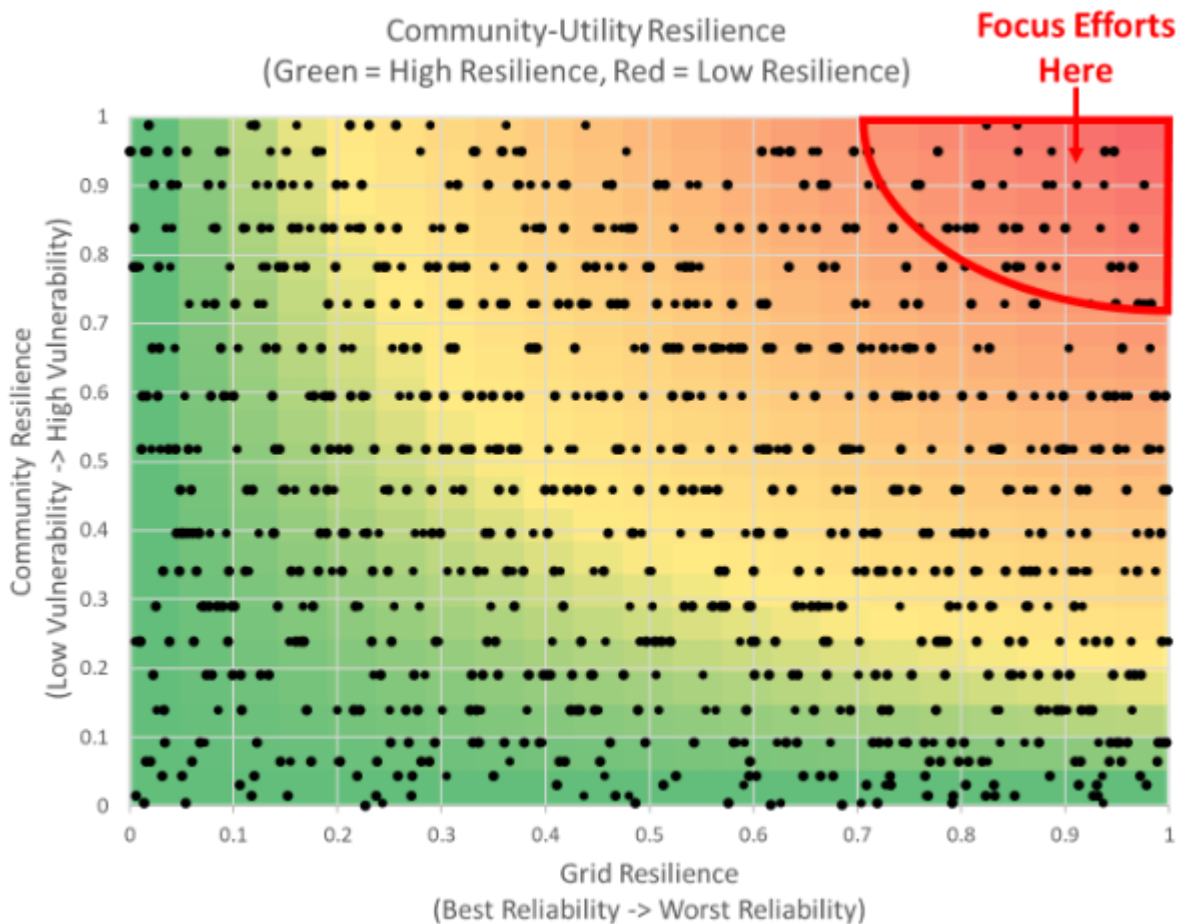
No.	Category	CBI	Metric(s)
1a	Resilience	Improve resilience of vulnerable communities during long duration outages	SAIDI at area level including major events
1b	Resilience	Improve resilience of vulnerable communities during long duration outages	SAIFI including major events
1c	Resilience	Improve resilience of vulnerable communities during long duration outages	CAIDI including major events
2	Resilience	Reduce frequency and duration of energy outages	Energy Not Served (ENS)
3	Environmental Impacts	Increase energy from non-emitting and renewable resources	Amount of Oregon-allocated renewable and non-emitting energy (MWh)
4	Environmental Impacts	Reduce CO2 equivalent emissions	Amount of Oregon CO2 equivalent emissions, MT CO2e
5	Environmental Impacts	Reduce NOx and SO ₂ emissions	Amount of NOx and SO ₂ emissions produced ²⁰
6	Health & Community Well-Being	Decrease residential disconnections	Number of residential disconnections and arrearages by census tract
7a	Health & Community Well-Being	Decrease proportion of households experiencing high energy burden	Average energy burden by census tract.

No.	Category	CBI	Metric(s)
7b	Health & Community Well-Being	Decrease proportion of households experiencing high energy burden	Average energy burden for customers residing in census tracts identified as underserved or vulnerable.
7c	Health & Community Well-Being	Decrease proportion of households experiencing high energy burden	Low-Income Discount (LID) program participation
8	Health & Community Well-Being	Increase residential and small business energy efficiency for vulnerable communities	Count of customer participation in business and residential incentive programs by census tract
9	Health & Community Well-Being	Reduce barriers to participation in energy efficiency programs for vulnerable communities	Low-income energy efficiency program participation
10	Economic Impacts	DSM program delivery staff and grants	Headcount of DSM program delivery staff and grants awarded
11	Economic Impacts	Public charging station installations	Count of public charging stations installed in PacifiCorp territory
12	Economic Impacts	Pre-apprenticeship and educational program participation	Headcount of participants in pre-apprenticeship programs
13	Economic Impacts	Local workforce development	Headcount of local and state workers during facility construction
14	Economic Impacts	Diverse business expenditures	Spend on Disadvantaged Business Enterprise (DBE), tribal, women, minority, and/ or veteran-owned resources during facility construction

PacifiCorp defines resilience as the combined ability of a community and the electric grid to withstand, respond to, and recover from events that result in long-duration power disruptions.

- Resiliency Analysis Framework:
- PacifiCorp has developed a community-utility resiliency scoring methodology
- The score captures both the vulnerability of a community and the historical reliability of the electric grid serving it
- The score enables the company to prioritize outreach, guide resilience investments and support applications for grant opportunities where they may have a greater relative impact

The graph below charts the community resilience and grid resilience scores.



The communities in the top right have the worst combined reliability scores and are more vulnerable, PacifiCorp will focus efforts and investments there. Community-Based Renewable Energy (CBRE) projects are an example of those efforts. CBRE projects are defined as energy systems that interconnect to utility distribution or transmission assets, and may be combined with microgrids, storage systems, demand response measures, or energy-related infrastructure that promotes climate resiliency. An updated review of CBRE potential inventory shows an estimated 95.59 MW of CBRE capacity by the end of 2029, including 71.69 MW of potential capacity from current CBRE programs and 23.9 MW from new pathways. PacifiCorp's CBRE Resiliency-Hub Pilot kicked off early 2025, developed with stakeholder engagement, provides much-needed support for development and implementation of local, community-led resilience opportunities. Outreach was prioritized based on community-resilience scores. The Pilot is designed to uncover benefits to both ratepayers and critical facilities.

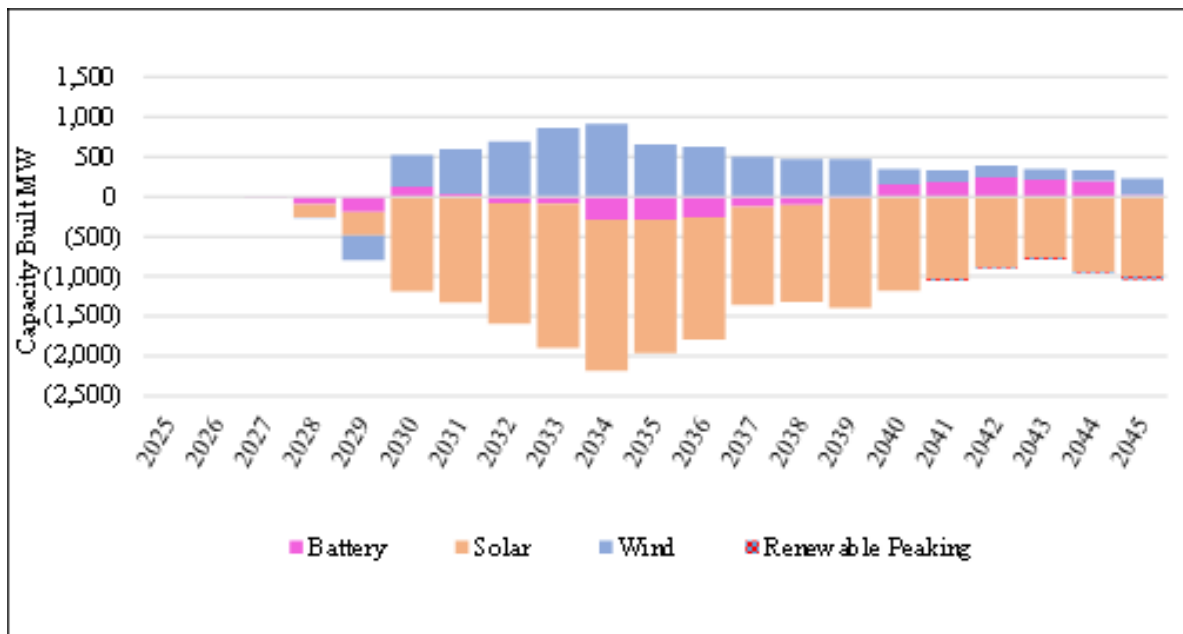
Meeting Discussion

- Pat DeLaquil, MCAT, asked for a definition of critical facilities.

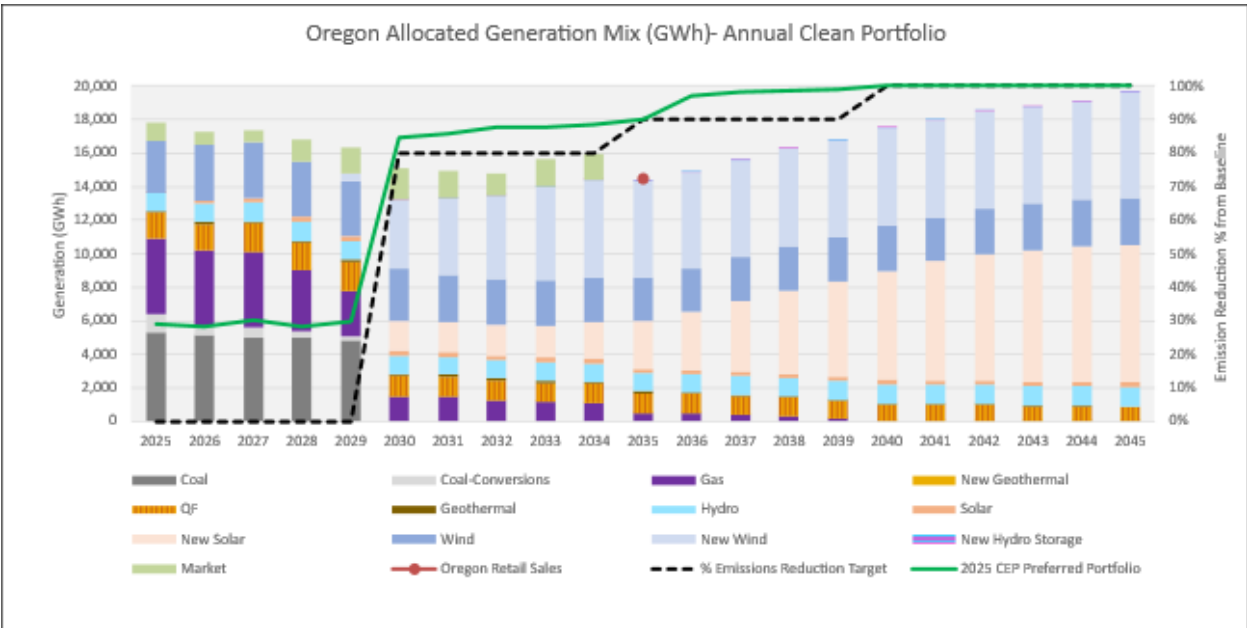
- Dr. Ghosh defined critical facilities as fire departments, community centers, schools and other buildings alike. These facilities would act as relief centers during outage events and provide the opportunity for cooling, device charging, and medication refrigeration.
- Dante Means asked if the CBRE Purchase Power Agreement is structured for small or midscale projects.
 - Dr. Ghosh offered to circle back after connecting with the appropriate CBRE SME.

While the 2025 IRP served as a starting point for resource planning, there have been several updates to the model since the filing which has influenced changes in the CEP preferred portfolio. The CEP portfolio is still based on a unified portfolio, incorporating all system and state specific requirements, however, there is a locked portfolio for non-Oregon jurisdictions. Those jurisdictional selections have not changed from the 2025 IRP.

The chart below shows the changes to the 2025 CEP preferred portfolio from the 2025 IRP. Positive numbers indicate that more of a given resource was selected in the 2025 CEP.



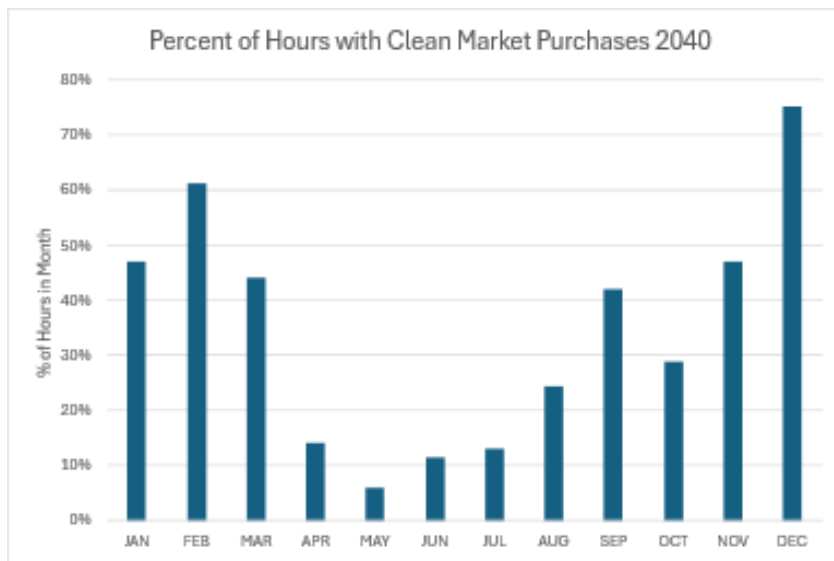
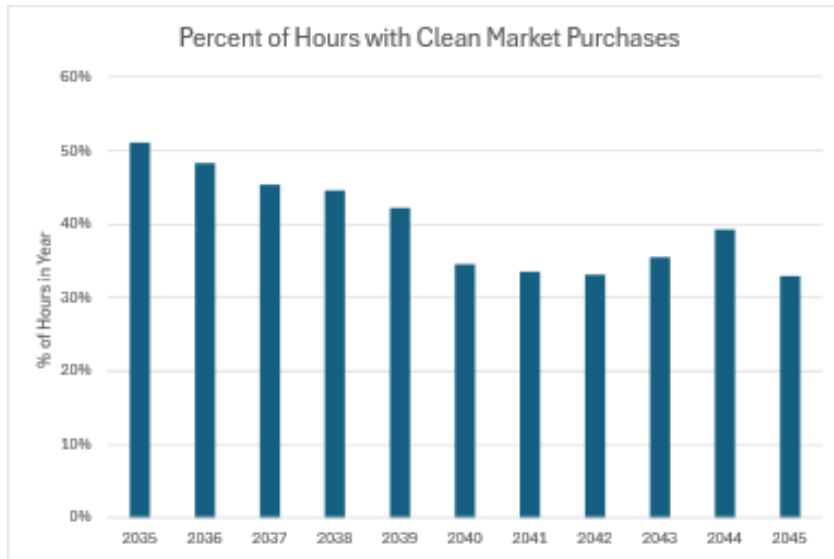
The graph below captures the forecast energy mix and GHG reductions in the portfolio Oregon allocated over time. At the end of 2029, all coal fire generation drops off and is no longer serving Oregon which will drive significant progress towards the emissions reduction goals. In 2035, Oregon generates just enough energy on an annual basis to cover retail sales.



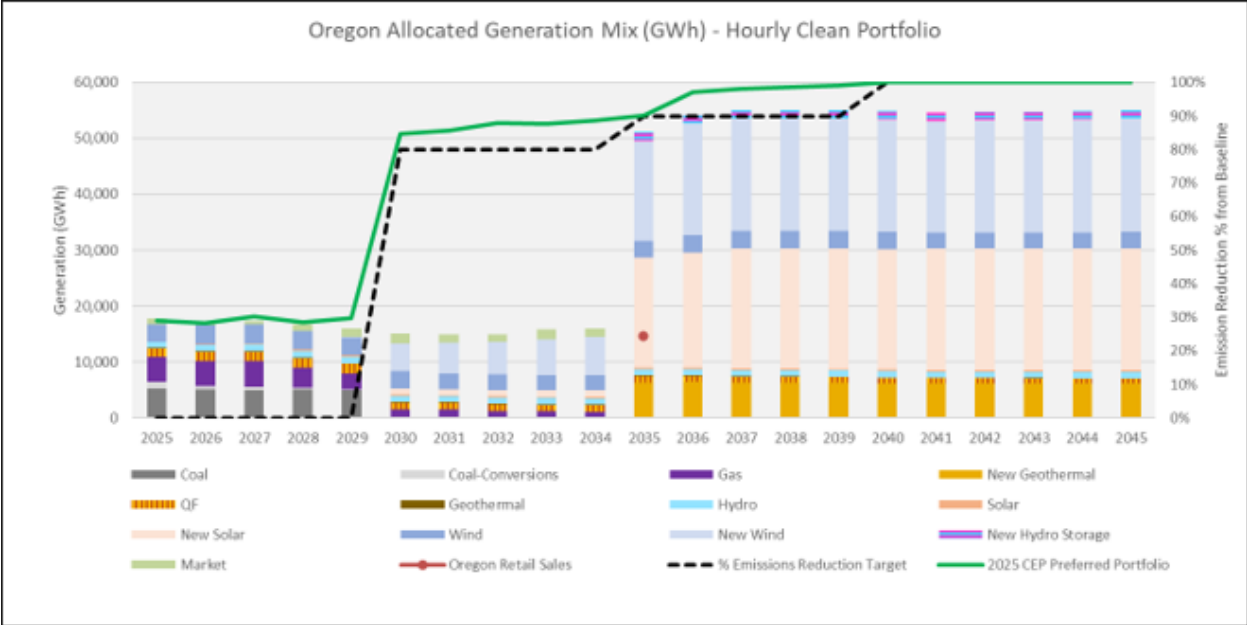
Meeting Discussion

- Nick Pappas questioned if the swing from a dominant solar portfolio in the IRP to a wind dominant profile in the CEP. What is driving the significant overbuild in the IRP versus the CEP?
 - Samuel Zacharia directed attention to the emissions reduction target in the 2025 IRP which is well over the minimum standard required in 2030, which is partially responsible for the reduction seen. There is not significant overbuild in the IRP, the difference is about 600 megawatts in 2030. It is important to remember that the model can tell the solar resource produces a different number of megawatt hours than a wind resource that is the same capacity.
- Pat DeLaquil noted that one of the key assumptions is the lack of a clean energy market that the team could rely on after 2035. It would be useful to see a scenario where PacifiCorp assumes the creation of that kind of market since it seems the capacity driven solar needs are based on that assumption.
 - Mr. Zacharia has seen similar feedback in the comments of LC-85 and a clean market is being considered for the 2025 IRP Update and future modeling.
- Jim Himelic asked PacifiCorp to address any concerns around procurement volume and the need to procure the amount of wind generation by 2030 to achieve the significant reduction in GHG needed for the 80% target.
 - Dr. Ghosh explained that the IRP prescribes specific technology types based on the costs it knows and timing, it is imperfect because it is proxy information. In comparison, an RFP will be analyzed based on actual bids and resources, and technology types and costs. It is a significant volume of megawatt hours and megawatts of firm capacity that is needed to serve Oregon customers in 2030. As the team moves through the RFP process, the reality of cost impacts and volume available will become clearer. There will be ample opportunities to weigh in on all things resource planning.

The CEP preferred portfolio achieves annual compliance consistent with the current Oregon DEQ methodology but has many individual hours in which Oregon’s load is higher than its resource allocation. Access to a clean market or additional resources would be required. The charts below illustrate the percentage of hours from 2035 – 2045 with an additional lens on 2040 to highlight seasonal patterns.



In 2035, Oregon generates a large excess of energy in most hours to achieve hourly clean compliance, far above forecasted retail sales on an annual basis. The chart below illustrates the resources needed to have enough energy available at every hour. The red dot represents forecasted Oregon retail sales for 2035.



The 2025 CEP includes an action plan that builds on the IRP with additional detail added. Notable updates are captured below:

	Action Item
Existing Resource Actions	<ul style="list-style-type: none"> • Natural Gas Emissions Compliance Strategies: dispatch and accounting considerations
New Resource Actions	<ul style="list-style-type: none"> • Small-scale renewables: 2025 OR SSR RFP was issued to market April 2025; PacifiCorp will evaluate and pursue bids • Utility-scale resources: 2025 OR Situs RFP draft was filed with Commission April 2025; upon approval will issue to market; PacifiCorp will evaluate and pursue bids with an online date before end 2029 • Transmission: continue to analyze and pursue projects; expand consideration of impacts to EJ communities
Demand-Side Management Actions	<ul style="list-style-type: none"> • Energy efficiency: continue to collaborate with ETO to review their proposed multi-year-plan for 2026-2030 • Demand response: continue to expand portfolio of DR programs by launching three new programs in 2025, looking to double total DR capacity by 2027
CBRE Actions	<ul style="list-style-type: none"> • Provide annual CBRE assessment, strengthen partnerships and consider a Blue-Sky Grant Program “Go-Back” Strategy
Community Engagement	<ul style="list-style-type: none"> • Continue with planned CBIAG and Tribal Nations CBIAG and CEP engagement meetings in 2025

Community Benefit Indicators	<ul style="list-style-type: none"> • Solidify newly proposed CBI metrics with advisory groups and any other revisions to the framework • Work collaboratively to develop a proposal for environmental justice community framework
Regulatory Actions	<ul style="list-style-type: none"> • Engage with regulatory agencies in relevant upcoming rulemakings regarding GHG methodology and HB 2021 cost cap implementation • Continue to work with Commission and stakeholders to seek clarification on SSR mandate • Continue to engage with CAISO, regulators and other stakeholders to develop a GHG accounting and reporting framework for market participation

Meeting Discussion

- Jim Himelic questioned why there is a need to do a reoptimization? If everything is locked down and Oregon is reoptimizing its territory, is the model not given full visibility in terms of how a true system wide optimization could be done to satisfy all PacifiCorp customer base at least cost least risk?
 - Dr. Ghosh explained that the IRP 2025 preferred portfolio was compliant with all Oregon requirements, including HB 2021 reductions of emissions goals. However, because the CEP was filed 90 days later, updated information was included. Information is constantly changing, and PacifiCorp is committed to sharing information as available.
 - Mr. Zacharia responded to the second question, noting that in the IRP and CEP, all the proxy resource selections that are in the entire portfolio are allocated to a particular jurisdiction. Every resource shows up as belonging to that jurisdiction, but this does not mean that it is restricted from system-wide procurement.
 - Randy Baker, Director of Resource Planning, noted that the team is looking for resources that can be used across the entire system, however, current constraints are limited in comparison to the past and requirements on each side of the system are different and are not always compatible. The team is always looking for the least cost, least risk solution that meets all requirements. There are new and important factors that must be considered now, that were not a factor in the past. There is a cadence in the planning that is impacted by the various jurisdictions, and it would not be wise to redefine Oregon's portfolio based on the requirements for other jurisdictions. The current strategy is based on a rolling succession of analysis.
 - Mr. Himelic still has some confusion around understanding how the IRP and CEP fit together.
- Nick Pappas asked how the model influences actual solicitations and procurement when resources have very different characteristics. How does a significant shift seeking to solve the same constraints come to such different conclusions? Does it imply that the fit is not important for resources bidding into the solicitation?

- Dr. Ghosh will follow up on these questions via email in more detail. It is important to note that the model is sensitive to the proxy resource dynamics and tries to balance the most valuable energy that it can get at a certain time to meet the various constraints.
- Mr. Baker noted that the prices for solar and wind changed moving into the CEP versus the IRP based on updated information. Solar and wind in combination with battery and under various circumstances, are very competitive which can influence large changes between the IRP and CEP.

Cara Glennon Olsen, Community Benefits and Impacts Advisor, reviewed the timeline around building out the environmental justice community framework through 2027. In quarters 2 and 3 of 2025, advisory groups were introduced to the EJ community framework, which is captured in the 2025 CEP, and given the opportunity to provide feedback through a series of listening sessions. By quarter 1 of 2026, the findings from the listening sessions will be presented at the CEP engagement and participants will have the opportunity to provide feedback once more. By quarter 2 of 2026, Mrs. Glennon-Olsen will build out the EJ community framework and finalize it by quarter 2 in time for the 2027 Oregon CEP filing.

Kimberly Alejandro, Regulatory Manager, reviewed the IRP Public Input Meeting Series calendar and updates on Utah Docket No. 23-035-10 and Washington WAC 480-100-625.

Utah Docket No. 23-035-10 September 24, 2024, Order:

- UT 3.3** For future IRP cycles, PacifiCorp shall, prior to ranking resource portfolios, present indicative resource portfolios to stakeholders at a PIM at least five months before the planned filing date of the PacifiCorp's (final) IRP.
- UT 3.4** For future IRP cycles, the deadline established, in the third ordering paragraph above (3.3), for presenting indicative resource portfolios shall also function as the Data Lockdown Date; PacifiCorp shall not further alter modeling inputs after presenting indicative resource portfolios as the third ordering paragraph above requires and must wait to incorporate any late-breaking data until, at least, the subsequent IRP update filing.
- UT 3.5** For future IRP cycles, PacifiCorp shall present updated modeling results, including final evaluations and preferred portfolio selections, to stakeholders at a PIM meeting to be held at least two months before the planned filing date of PacifiCorp's (final) IRP

Washington WAC 480-100-625:

WA (3) Draft IRP. No later than four months prior to the due date of the final IRP, the utility must file its draft IRP with the commission. At minimum, the draft IRP must include the preferred portfolio, CEAP, and supporting analysis, and to the extent practicable all scenarios, sensitivities, appendices, and attachments.

(a) The commission will hear public comments on the draft IRP at an open meeting scheduled after the utility files its draft IRP. The commission will accept

public comments electronically and in any other available formats, as outlined in the commission's notice for the open public meeting and opportunity to comment.

(b) The utility must file with the commission completed presentation materials concerning the draft IRP at least five business days prior to the open meeting.

The preliminary 2027 IRP Public Input Meeting schedule is as follows:

Preliminary 2027 IRP Public Input Meeting (PIM) Schedule		
	Event	Date
2025	Meeting #1	October 1, 2025,
	Meeting #2	November 12, 2025,
	Meeting #3	December 17, 2025,
2026	Meeting #4	January 28 – 29, 2026
	Meeting #5	March 11 – 12, 2026
	Meeting #6	April 22 – 23, 2026
	Meeting #7	June 3 – 4, 2026
	Meeting #8	July 15 – 16, 2026
	Input Review	July 15, 2026,
	Meeting #9	August 26 – 27, 2026
	Meeting #10	October 14 – 15, 2026
	Indicative Portfolios ^{UT 3.3, 3.4}	October 14, 2026,
	Meeting #11	November 18 – 19, 2026
	Draft 2027 IRP ^{WA (3)}	November 30, 2026,
2027	Meeting #12	January 28 – 29, 2027
	Present final evaluations ^{UT 3.5}	January 28, 2027,
	Meeting #13	February 25 – 26, 2027
	File 2027 IRP	March 31, 2027,

Oregon Regulatory Updates

Amira Streeter, State Regulatory Affairs Manager, shared regulatory updates on recent rate changes including Schedule 103 and Schedule 190. Schedule 103 is the Multnomah County Business Income Tax

Recovery, or the mechanism PacifiCorp uses to recover the costs of paying the tax assessed on operations in Multnomah County. This cost is passed on to local ratepayers and is not absorbed as a company cost. This rate change was submitted on June 6, 2025, with an effective date of July 9, 2025. The estimated return to customers is \$270,155 over one year, with a proposed rate of 0.12 percent. This change will affect approximately 89,000 customers in Multnomah County with an increase of 0.18 percent. The average residential customer using 900 kWh per month in Multnomah County will see a monthly bill increase of approximately \$0.29 per month.

Schedule 190 is the Wildfire Mitigation Plan Cost Recovery Adjustment which allows PacifiCorp to recover costs associated with the implementation of wildfire mitigation plans to ensure that funding will be available for wildfire prevention, safety measures, and system hardening. This adjustment was submitted on July 1, 2025, with an effective date of October 31, 2025 to recover \$18.8 million in capital costs from April 1, 2024, through March 31, 2025. The overall impact is an annual rate decrease of \$29.6 million or 1.5 percent. The average residential customer using 900 kWh per month would see a bill decrease of \$2.76 per month.

Schedule 94 is the Vegetation Management Cost Recovery Adjustment which is a tariff that allows PacifiCorp to recover costs specifically associated with activities like tree trimming and removal to help reduce wildfire risk and improve system reliability. This adjustment is applied as a surcharge on customer bills to ensure PacifiCorp can fund ongoing safety and reliability efforts. The change was submitted on May 5, 2025, with an effective date of October 31, 2025, and will return approximately \$4.7 million over one year with a proposed rate of 0.2 percent. Approximately 667,000 customers will be impacted with the average residential customer using 900 kWh per month will see a monthly bill increase of approximately \$0.33 per month.

The FAIR Act or HB 3179 was recently passed and as a result the following regulation changes for customers will be implemented: there will not be any increases for residential customers between November 1 and March 31, clear representation of residential cost breakdown by category, annual report that lists all expected rate adjustments for the next year, spread out rate requests increases every 3 years starting 2027. Additionally, the following utility operations will be implemented: economic impact analysis that weighs cumulative economic burden, submit multi-year rate plans, expanded low-cost financing options – issue bonds or use scrutinization for cost recovery, increased formal suspension period of a proposed rate or schedule by up to 10 months. More information on the FAIR Act can be found at:

<https://olis.oregonlegislature.gov/liz/2025R1/Downloads/MeasureDocument/HB3179/Enrolled>.

Oregon RFP Updates

Hannah Smith, Resource and Commercial Strategy, shared procurement updates including two Request for Proposals: 1) 2025 Oregon Small Scale Resource RFP and 2) 2025 Oregon Situs RFP.

2025 Oregon Small Scale Resource RFP – Reissue

- The 2025 OR SSR RFP is in support of the 2025 Integrated Resource Plan, House Bill 2021 requirements and as a first step in addressing a non-wire solution for grid needs per UM2005

- The small-scale renewable RFP was originally issued on April 23, 2025, and bid closed on July 2, 2025
- PacifiCorp has re-issued this RFP with the following changes:
- Resource nameplate capacity is now 100KW – 2MW
- 4-hour stand-alone battery is eligible up to 2MW
- Must be located on PacifiCorp’s system in Oregon
- Open to completed PacifiCorp Transmission Fast Track Process for interconnection only
- Removed the Transmission Consulting Agreement studies
- Removed the independent forecaster
- Reduction of bid fees to \$1,000 per MW per bid
- Bid close date has been moved to December 17, 2025

Questions or comments regarding this RFP can be submitted at email: 2025SSR_RFP@pacificorp.com
 For more information on Oregon RFP, please visit: [2025 Oregon Small-Scale Request for Proposals](#)

Next Steps:

- Continue responding to questions from potential bidders
- Continue moving forward with the process and published timelines for completion

2025 Oregon Situs RFP

- The PacifiCorp 2025 Integrated Resource Plan (IRP) established an action item to initiate a Request for Proposals (RFP) to procure resources for its Oregon customers that are aligned with the 2025 IRP preferred portfolio and that can achieve commercial operations by the end of December 2029.
- Based on current estimated projections, the 2025 IRP calls for:
 - 1,570 MW of utility scale solar resources,
 - 1,400 MW of utility-scale wind resources,
 - 320 MW of small-scale solar resources,
 - Energy storage resources, including 509 MW of lithium-ion batteries with four-hour duration, and
 - 272 MW of iron-air storage with 100-hour duration.
- In Order No. 25-098, the Oregon Commission provided a directive that PacifiCorp should issue an RFP by June 1, 2025,
- On April 16, PacifiCorp filed UM 2383, Expedited Application for Partial Waiver of OAR Chapter 860-089, Request to Engage Independent Evaluator, and Expedited Approval of 2025 Draft RFP to meet this June 1, 2025, directive.
- **PacifiCorp is awaiting a decision on this waiver from the Oregon Commission; all elements of the OR Situs RFP are pending**

Next Steps:

- **Awaiting decision from Oregon Commission before moving forward**

The proposed RFP schedule is noted below. This schedule is subject to change; any changes will be posted on the 2025 Oregon small scale renewable RFP website.

Event	Date
RFP issued to market and publicized	7/25/2025
Bidder workshop	7/30/2025
Last day for Bidder questions to PacifiCorp	11/19/2025
Bid submissions due	12/17/2025
Bid evaluations complete	1/14/2026
RFP final shortlist complete	1/28/2026
Contracts finalized and executed	6/30/2026
Guaranteed commercial operation date (GCOD)	12/31/2029

Meeting Discussion

- Kate Ayres, OPUC, noted there was a mention about using CBIs and metrics in the small scale and/or Oregon Situs RFPs. How have CBIs been included in the RFP process or scoring process?
 - Sarah Reed explained that both CBIs and metrics are included in the small-scale Oregon Situs RFP. There are about 19 questions that are weighted equally asking for information on how developers are considering their impacts to job, environments, local communities, etc. Overall, non-price scoring equals 20% of the overall score that is summed up with the 80% price scoring used for the ranking of bids.

Public Comment

- Pat DeLaquil requested a more detailed explanation of how resources are either allocated to the system or to specific states.
 - Mr. Zacharia distinguished existing resources from new resources. Existing resources are allocated across the entire system based on the existing factors. New resources are what the model selects. In chapter 9 of the 2025 IRP, there is a table that shows all of the resources that are being added in the IRP and which jurisdiction those resources are allocated to.

2025 Engagement Opportunities

Special Session on PacifiCorp's Oregon Environmental Justice Community Framework

When: November 19, 2025, 9:00am-12:00 pm PST

Registration Link: <https://esource.zoom.us/meeting/register/sXCsyIMJTb2b-BB6u4tjxg>

Community Benefits and Impacts Advisory Group Meeting

When: September 18, 2025, 1:00-4:00 pm PST

Meeting Link: <https://esource.zoom.us/j/82931051060?pwd=lWHpOMngBp6yzonAeBWAXdhkBkrdnW.1>