BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
08/10/26
03:49 PM
R2506019

Order Instituting Rulemaking to Continue Oversight of Electric Integrated Resource Planning and Related Procurement Processes.	Rulemaking 25-06-019 (Filed June 26, 2025)

INTEGRATED RESOURCE PLAN OF PACIFICORP (U 901-E) FOR 2026

Joseph Dallas
Assistant General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Tel: (503) 813-5701
Email: joseph.dallas@pacificorp.com

Jedediah J. Gibson
Downey Brand LLP
621 Capitol Mall, 18th Floor
Sacramento, CA 95814
Tel: (916) 520-5280
Email: jgibson@downeybrand.com

Attorneys for PacifiCorp

August 10, 2026

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Continue Oversight of Electric Integrated Resource Planning and Related Procurement Processes.	Rulemaking 25-06-019 (Filed June 26, 2025)

INTEGRATED RESOURCE PLAN OF PACIFICORP (U 901-E) FOR 2026

In accordance with California Public Utilities Code Sections 454.51 and 454.52, Decision (D.) 18-02-018, the Decision Setting Requirements for Load Serving Entities Filing Integrated Resource Plans, and the Administrative Law Judge's Ruling Setting Requirements for Individual Integrated Resource Plans Due June 1, 2026, issued January 16, 2026, in Rulemaking (R.) 25-06-019 (Ruling),[1] PacifiCorp (U 901-E), d/b/a Pacific Power (PacifiCorp) hereby submits its 2025 Integrated Resource Plan Update (2025 IRP Update) to meet the requirements set forth for the non-standard Load-Serving Entity (LSE) plan. The 2025 IRP Update is available electronically on PacifiCorp's website at https://www.pacificorp.com/energy/integrated-resource-plan.html.

PacifiCorp provided a Notice of Availability to the California Public Utilities Commission (Commission) that its 2025 IRP was filed on March 31, 2025.[2] Following the 2025 IRP, PacifiCorp completed its 2025 IRP Update. PacifiCorp's 2025 IRP Update included significant updates since the filing of the 2025 IRP, including changes to federal tax credits for new resources, resulting in an updated preferred portfolio. The 2025 IRP Update was posted to

[1] Note that a subsequent ruling, the Administrative Law Judge's Email Ruling Granting Joint Request for Extension of Load Serving Entity (LSE) Integrated Resource Plan (IRP) Filings, R.25-06-019 (Mar. 9, 2026), extended the deadline for individual LSE IRP filings to August 10, 2026.

[2] PacifiCorp's 2025 IRP may be viewed and downloaded at the following URL: https://www.pacificorp.com/energy/integrated-resource-plan.html.

PacifiCorp's IRP website on March 31, 2026, and filed where required.[3] The 2025 IRP Update included Appendix F – California Update which presented PacifiCorp's California allocated greenhouse gas (GHG) emissions and performance against GHG benchmarks resulting from the 2025 IRP Update preferred portfolio.

I. Introduction and Background

PacifiCorp serves more than 2 million customers in six western states (California, Idaho, Oregon, Utah, Washington, and Wyoming) and operates two balancing authority areas (BAAs), PacifiCorp East (PACE) and PacifiCorp West (PACW) which encompass its six-state service territory. Of those customers, about 46,000 are in Del Norte, Modoc, Shasta, and Siskiyou counties in northern California. These customers currently comprise less than 1.5 percent of PacifiCorp's total retail electric sales. PacifiCorp is uniquely situated in comparison to the other LSEs in California because of its load-service obligations in six states and multi-state cost allocation considerations. PacifiCorp operates its entire six-state service territory as a single system, allowing the company to keep costs low for all customers. On the planning side, PacifiCorp identifies both system and state-specific needs based on the requirements of each state it serves. PacifiCorp may issue system or state-specific requests for proposals (RFPs) to market if a resource need is identified for the system or a single state.

As part of the process of planning for and managing its six-state system, PacifiCorp files its IRP on a biennial basis with each of the state utility commissions in its service area. In the years between biennial IRP filings, PacifiCorp completes a comprehensive IRP Update to ensure its long-term resource planning reflects the most current information available. As described in

[3] Oregon is the only state PacifiCorp serves which requires an IRP Update to be filed (see Oregon rule OAR 860-027-0400(11)). The 2025 IRP Update is available on the company's IRP website: https://www.pacificorp.com/energy/integrated-resource-plan.html.

detail in its 2025 IRP Update, PacifiCorp optimizes its system and procurement to provide reliable service in a cost-effective manner.

PacifiCorp produces a single IRP for its multi-state system that satisfies the requirements of each of its state utility commissions, as well as other regulatory policies and mandates. Each state utility commission has specific IRP standards and guidelines that influence PacifiCorp's IRP by establishing requirements for filing and update frequency, public input, the planning horizon and other fundamental elements of long-term resource planning. At the most basic level, PacifiCorp's IRP presents a preferred portfolio of resources over a twenty-year planning horizon. The IRP identifies the optimal type, timing, and location of future resource needs over the planning horizon. The preferred portfolio is determined on a least-cost, least-risk basis, chosen from a range of eligible resource portfolios. The IRP also produces an action plan that identifies the specific steps PacifiCorp will implement over the near-term (the first two to four years of the planning horizon) to deliver on the proxy resources identified in the preferred portfolio.

In addition to the detailed information provided in its IRP, PacifiCorp provides supplemental information in the sections below to ensure that all required aspects of Senate Bill (SB) 350, D.18-02-018, D.19-04-040, and other Commission requirements, including those outlined in the Ruling, are addressed. First, in D.18-02-018, the Commission directed the company to provide "supplemental information about disadvantaged communities or any other required aspect of SB 350 required in this decision that is not already covered in their IRP filing prepared for those other jurisdictions."[4] Thus, this IRP filing includes a supplemental discussion of disadvantaged communities and PacifiCorp's plans to address the GHG emissions benchmarks adopted in D.18-02-018 and updated by the Ruling.[5]

[4] D.18-02-018, p. 131.
[5] The ALJ Ruling from January 16, 2026, in R.25-06-019, identifies a 2030 GHG benchmark for PacifiCorp of 0.209 million metric tons (MMT), as well as benchmarks for 2035, 2040, and 2045.

In approving the company's 2017 IRP in D.19-04-040, the Commission noted that the company is not required to use the Clean Net Short (CNS) Calculator for estimating its GHG emissions and directed PacifiCorp to "consult with Commission staff and describe an alternative methodology that addresses its share of the 2030 GHG emissions reduction responsibility."[6] The Ruling further notes how PacifiCorp is authorized to file a "non-standard plan"[7] and the Commission's IRP narrative template further outlines how PacifiCorp is not required to submit the Clean System Power (CSP) calculator tool or the Resource Data Template as part of its IRP.[8] The Commission updated 2030, 2035, 2040, and 2045 GHG target scenarios in the Ruling. PacifiCorp has consulted with Staff regarding proposed methodologies for demonstrating how the company's IRP portfolio will meet the updated 2030 GHG emissions benchmark of 0.209 million metric tons (MMT) under the statewide 30 MMT scenario, the 2035 GHG emissions benchmark of 0.175 MMT under the statewide 25 MMT scenario, the 2040 emissions benchmark of 0.126 MMT under the statewide 16.8 MMT scenario, and the 2045 emissions benchmark of 0.065 MMT under the statewide 8.68 MMT scenario. The methodology proposed by PacifiCorp is provided in Appendix A to the company's filing.

II. Consideration of Disadvantaged Communities

The Commission's IRP narrative template describes how "LSEs should also describe any analysis or activities targeted at minimizing criteria air pollutants in DACs and identifying feasible procurement opportunities to reduce reliance on fossil-fueled power plants located

[6] D.19-04-040, p. 74.

[7] Ruling, p. 8.

[8] IRP Narrative Template, p. 3.

within disadvantaged communities."[9] In July 2026, CalEPA updated its designation of disadvantaged communities for the purpose of SB 535, defining disadvantaged communities as:

1. Census tracts with the highest 25 percent of CalEnviroScreen 5.0 overall scores.
2. Census tracts with the highest 5 percent of CalEnviroScreen 5.0 pollution burden scores.
3. Census tracts that overlap at least 25 percent with a 2022 DAC-designated census tract based on CalEnviroScreen 4.0.
4. Lands under the control of federally recognized tribes, with updated tribal boundaries data.[10]

PacifiCorp does not own or contract with any emitting generation resources in California, so there are no criteria air pollutants attributable to PacifiCorp's emitting generation resources impacting DACs in California. As may be seen in Figure 7.16 of PacifiCorp's 2025 IRP Update (p. 106), PacifiCorp's 2025 IRP Update preferred portfolio presents a downward trend in PacifiCorp's system carbon dioxide equivalent (CO_2e) emissions trajectory over the IRP planning horizon, providing benefits to all customers, including DACs, from reduced greenhouse gases. Declining system emissions are largely driven by significant new clean resource additions in the 2025 IRP Update preferred portfolio, particularly located in PACW, though the exact type, timing, size and location of new resources is not determined by the IRP. The selection of proxy clean resources on the west side of PacifiCorp's system is directly tied to the environmental policies of those west side states. Additionally, through expanded market participation, access to clean energy generation in the west is also expected to continue improve, allowing more clean generation across PacifiCorp's footprint and the Western interconnect to serve customers. Expanded generation from new clean resources and better connectivity across the west will

[9] IRP Narrative Template, p. 10.

[10] https://calepa.ca.gov/programs/dac2026/.

benefit all nearby communities where criteria air pollutants are offset, potentially including DACs in California.

While PacifiCorp does not serve any communities that fit the designation of disadvantaged communities under definitions one through three above, land under the control of federally recognized Tribes is part of PacifiCorp's California service territory in northern California. Federally recognized Tribes within PacifiCorp's California service territory include the Karuk Tribe, Yurok Tribe, Tolowa Dee-Ni Nation, Elk Valley Rancheria, Quartz Valley Indian Reservation, Alturas Rancheria, Fort Bidwell Indian Community and Pit River Tribe. PacifiCorp addresses the impacts on disadvantaged communities in various ways. The company's ongoing efforts to collaborate and partner with Tribal Nations has led to successful disposition of a Pacific Power "Parcel A" property, which was purchased by the Klamath Indigenous Land Trust (KILT)[11] in 2025 for use and management by the Tribes of the Klamath Basin. That transaction represented the first land purchase by KILT. Additionally, PacifiCorp Regulatory and Real Estate staff ensure compliance with California's Tribal Land Transfer Policy.

PacifiCorp has dedicated personnel to support consultation and coordination with Tribal Nations. The Regional Business Manager (RBM), based in Yreka, California, serves as the primary point of contact with Tribal leaders and staff and provides information regarding potential grant and funding opportunities for various energy projects. PacifiCorp's Tribal Liaison Representative supports the RBM and other employees involved in Tribal consultation and engagement activities. The company's California Wildfire Advisory Board includes representatives from Tribal Nations, local agencies, and a variety of other community partners.

[11] https://klamathtrust.org/

The Board convenes biannually to discuss the company's wildfire program and provides the company feedback on PacifiCorp's wildfire planning, coordination, communication, outreach, preparedness programs, and mitigation and response efforts. In 2026, the company's Emergency Management team collaborated with Tribes in Modoc, Siskiyou and Del Norte counties for a Public Safety Power Shutoff tabletop exercise and discussion on emergency planning. PacifiCorp is currently implementing a wildfire hardening project on the Quartz Valley Indian Reservation lands and has entered into a unique agreement that allowed the Tribe's cultural resource specialist to serve as a site monitor during that process. These programs and engagement efforts are just some of the ways PacifiCorp addresses impacts on disadvantaged communities.

III. GHG Emissions Benchmarks

In R.16-02-007, following the 2017-2018 IRP cycle, the Commission issued D.19-04-040 on April 25, 2019, approving PacifiCorp's 2017 IRP.[12] Regarding the CNS tool used to compare the LSE-specific GHG emissions benchmark to the forecasted emissions from the IRP, D.19-04-040 acknowledged that PacifiCorp was not required to submit a CNS calculator as part of its IRP filings, but recommended:

> While PacifiCorp is not required to use the CNS Calculator for estimating its GHG emissions, since it is not within the CAISO footprint, PacifiCorp should consult with Commission staff and describe an alternative methodology that addresses its share of the 2030 GHG emissions reduction responsibility.[13]

In 2020, the Commission updated the name of the CNS Calculator to the CSP Calculator.[14] Consistent with D.19-04-040, PacifiCorp has used an alternate emissions calculation methodology that mirrors the methodology the company uses under the California

[12] PacifiCorp also included its 2017 IRP Update in its filing in R.16-02-007 for the 2017-2018 IRP cycle.

[13] D.19-04-040, p. 74.

[14] See the filing requirements for 2020 IRP filings: R.20-05-003.

Air Resources Board's (CARB) Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (MRR).

PacifiCorp's proposed methodology to compare its California allocated emissions to its 2030, 2035, 2040, and 2045 GHG benchmarks identified by the Commission in this proceeding,[15] uses forecasted generation and emissions from a new conforming portfolio developed based on its 2025 IRP Update preferred portfolio to calculate PacifiCorp's California allocated emission intensity rate. The California allocated emission intensity rate is then multiplied by California retail sales (less California in-state generation) to derive the level of California allocated GHG emissions to meet PacifiCorp's 2030, 2035, 2040, and 2045 GHG benchmarks of 0.209 MMT, 0.175 MMT, 0.126 MMT, and 0.065 MMT, respectively. A detailed explanation of this methodology and the results across four planning scenarios are provided in Appendix A.

As noted in the introduction, PacifiCorp serves over 2 million customers and operates two BAAs across six states to serve all of its customers, including the approximately 46,000 retail customers located in California. In developing the MRR for GHG emissions and the Cap-and-Invest Program, CARB recognized that PacifiCorp cannot attribute particular resources or transactions to its California customers. The MRR includes provisions that are unique for "multi-jurisdictional retail providers" and requires that the company determine a weighted emissions rate for all the resources allocated to California and located outside the state. For PacifiCorp, the Cap-and-Invest compliance obligation is then calculated by subtracting in-state generation from the company's California retail sales and applying the California allocated system rate to the remainder of its California load.[16] Additionally, PacifiCorp plans for other California GHG

[15] See the January 16, 2026 ALJ Ruling.

[16] *See* Cal. Code Reg. Section 95111.

related targets – e.g., the renewables portfolio standard (RPS) and other state environmental goals, and PacifiCorp procures Cap-and-Invest allowances to ensure that all emissions apportioned to its California service territory are accounted for in the state's primary carbon compliance mechanism.

In its 2025 IRP Update, PacifiCorp assessed its compliance with the GHG targets identified in R.25-06-019. PacifiCorp calculated its GHG benchmark position based on the 2025 IRP Update preferred portfolio; the GHG benchmark position is presented in the 2025 IRP Update, Appendix F "California Update", Table F.1. In this filing, PacifiCorp updated Table F.1 from the 2025 IRP Update incorporating updates to existing resource contracts since the 2025 IRP Update. Specifically, PacifiCorp updated the California in-state generation to include Fall Creek - Klamath Falls, a resource that is physically located in the state of California. The updated version of Table F.1 from PacifiCorp's 2025 IRP Update is presented in Appendix A, Table A.1. As seen in Table A.1, PacifiCorp's California share of emissions in 2030 is projected to be 0.297 MMT which does not achieve the 0.209 MMT GHG benchmark for 2030. Table A.1 also shows that the 2025 IRP Update preferred portfolio does not achieve the GHG benchmarks for 2035, 2040, or 2045.

A. Conforming Portfolio GHG Emission Benchmarks

PacifiCorp created a new conforming portfolio to meet the California GHG benchmarks for this filing. PacifiCorp's new conforming portfolio is largely unchanged from the 2025 IRP Update preferred portfolio, with one significant addition. After considering multiple compliance pathways to achieve the GHG benchmarks identified in R.25-06-019, PacifiCorp determined the optimal way to achieve the GHG benchmarks, assuming current information, is to add a new clean generation resource in California. To achieve the 2030, 2035, 2040, and 2045 GHG benchmarks of 0.209 MMT, 0.175 MMT, 0.126 MMT, and 0.065 MMT, respectively, the new

conforming portfolio includes an 80.25 megawatt (MW) nameplate capacity proxy solar resource to be added in California by 2030 producing a minimum of 205,890 megawatt-hours (MWh) in 2030, assuming no line losses, no curtailment, and a minimum capacity factor of 29.29%.[17] A slightly larger nameplate capacity solar resource may need to be added in California to account for these risks, and additional clean capacity would be required in California to comply with the declining GHG benchmarks in 2035, 2040 and 2045. While the conforming portfolio includes a new solar resource, other clean energy resources located in California, which may differ in size from the new solar resource included in the conforming portfolio, could generate the minimum amount of megawatt hours needed to achieve the GHG benchmarks.[18] The California allocated GHG emissions resulting from the conforming portfolio are presented in Appendix A, Table A.2.

B. Alternative GHG Emission Benchmark Compliance Pathways

In addition to the conforming portfolio, PacifiCorp considered two other pathways to achieve its GHG benchmarks: 1) adding new, clean generation outside California and, 2) adjusting the allocation of PacifiCorp's system resources to California. As seen in Table A.3 PacifiCorp estimated that, to achieve the GHG benchmarks by adding resources only located outside of California, assuming a capacity factor of 30%, PacifiCorp would need to add approximately 7,905 MW of clean system nameplate capacity, or 20,774,014 MWh of clean

[17] Note that these values are proxy-based and it should not be inferred that this is a plan for specific procurement. The integrated planning process is one part of a larger process which includes procurement planning in downstream processes. Leading up to year 2030 there will be fundamental updates to integrated resource planning data and assumptions which will drive the timing, type, volume and location of indicative proxy resources.

[18] While specific proxy resource types are selected in specific locations and years in IRP planning, real-world solicitations may diverge from the proxy resource selections identified in an IRP portfolio given the availability and economics of real-world resource opportunities. For example, in reality the 80.25 MW proxy solar resource indicated in the conforming portfolio could materialize as eight 10 MW solar facilities, one 40 MW enhanced geothermal facility with a higher capacity factor, or a combination of various clean resource types of various sizes, including options reducing California retail sales such as energy efficiency.

system generation by 2030, and 65,390 MW of clean system nameplate capacity, or 171,846,086 MWh of clean system generation by 2045, to reduce PacifiCorp's system emissions factor enough to meet the GHG benchmarks. Adding such a significant volume of system resources would not be economic.

Table A.4 presents the final alternative compliance pathway PacifiCorp considered, reallocating system resources such that no system coal-fired resources are included in California's allocated resource portfolio. Under this approach where California no longer shares system coal-fired resources, California's assigned share of system emissions would decline significantly, reducing California-allocated emissions to approximately 0.123 MMT in 2030 and achieving compliance with the 0.209 MMT 2030 GHG benchmark, as well as the 0.175 MMT 2035 GHG benchmark, without the addition of new clean resources. However, reallocating coal resources to other PacifiCorp customers does not eliminate the need for California customers to pay for their proportionate share of system resources. To continue to allocate costs on an equitable basis across PacifiCorp's customer base, PacifiCorp's California customers would need to be allocated an increased share in other system resources to replace their vacated share of coal-fired resources that would likely increase costs for California customers.

In addition to the mathematical challenge presented by reallocating system resources, resource reallocation presents significant implementation challenges given PacifiCorp's multi-jurisdictional service territory. PacifiCorp serves customers across six western states and allocates the benefits and costs of system resources among jurisdictions pursuant to established allocation methodologies. Reallocating a substantial portion of existing resources among states would introduce additional regulatory and operational complexity and require approval in all six states PacifiCorp serves. For these reasons, PacifiCorp selected the option which adds only a

small quantity of clean generation resources physically located in California as its conforming portfolio.

IV. Conclusion

PacifiCorp respectfully submits its IRP in accordance with California Public Utilities Code Sections 454.51 and 454.52, D.18-02-018, and applicable Commission requirements including those outlined in the Ruling.

Dated: August 10, 2026

Respectfully submitted,

/s/ Joseph Dallas

Joseph Dallas
Assistant General Counsel
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
Tel: (503) 813-5701
Email: joseph.dallas@pacificorp.com

Jedediah J. Gibson
Downey Brand LLP
621 Capitol Mall, 18th Floor
Sacramento, CA 95814
Tel: (916) 520-5280
Email: jgibson@downeybrand.com

Attorneys for PacifiCorp

OFFICER VERIFICATION

I am an officer of the reporting organization herein and am authorized to make this verification on its behalf. The statements in the foregoing document are true of my own knowledge, except as to matters which are therein stated on information or belief, and as to those matters, I believe them to be true.

Executed on August 10, 2026, in Portland, Oregon.

/s/ Rick Link

Rick Link

Senior Vice President, Regulation and Resource Planning

APPENDIX A

PACIFICORP CLEAN SYSTEM POWER ALTERNATIVE METHODOLOGY

PacifiCorp Clean System Power Alternative Methodology

As part of the 2017-2018 Integrated Resource Plan (IRP) cycle in R.16-02-007, the Commission issued Decision 19-04-040 (Decision) on April 25, 2019, approving PacifiCorp's 2017 IRP. Regarding the Clean Net Short (CNS) Calculator tool of the IRP, the Decision acknowledged that PacifiCorp was not required to submit a CNS Calculator as part of its IRP filings, but recommended:

> While PacifiCorp is not required to use the CNS Calculator for estimating its GHG emissions, since it is not within the CAISO footprint, PacifiCorp should consult with Commission staff and describe an alternative methodology that addresses its share of the 2030 GHG emissions reduction responsibility.[19]

The CNS Calculator is now named the Clean System Power (CSP) Calculator but is still inapplicable to PacifiCorp and not required to be provided by PacifiCorp as part of its IRP filing. PacifiCorp proposes the below methodology for demonstrating how the company's IRP portfolio will meet the 2030, 2035, 2040, and 2045 greenhouse gas (GHG) benchmarks of 0.209 million metric tons (MMT), 0.175 MMT, 0.126 MMT, and 0.065 MMT, respectively.

This alternative methodology is based on the preferred portfolio published in PacifiCorp's 2025 IRP Update, PacifiCorp's most recent IRP preferred portfolio analysis. The IRP is a comprehensive decision support tool and roadmap for meeting the company's objective of providing reliable and low-cost electric service to all of its customers. The plan is developed through a robust public process with input from state utility commission staff, state agencies, consumers, environmental and industry advocacy groups, project developers, and other interested parties. The IRP uses system modeling tools as part of its analytical framework to determine the long-run economic and operational performance of an array of resource portfolios. These models simulate the integration of new resource alternatives with PacifiCorp's existing assets, thereby informing the selection of a preferred portfolio judged to be the most cost-effective resource mix considering risk, supply reliability, uncertainty, government energy resource policies, and the various regulatory requirements of its multiple jurisdictions.

[19] See D.19-04-040 at 74. It should also be noted that the CNS Calculator is now referred to as the Clean System Power (CSP) calculator.

For the 2025 IRP Update, PacifiCorp used PLEXOS, a power system optimization model to determine the least-cost, least-risk portfolio of resources based on then-current assumptions. PacifiCorp uses two PLEXOS models: the long-term (LT) capacity expansion model and the short-term (ST) hourly dispatch model. The LT model is run according to the parameters and constraints of each particular study. This results in an expansion plan of selected resources, retirement decisions, and transmission option selections. Collectively these selections result in a unique "portfolio." The portfolio produced by the LT model is fed into the ST model which performs an hourly dispatch of the portfolio, forecasting system generation and emissions over a 20-year planning horizon. The ST model also reports shortfalls indicating the reliability of a given portfolio.

The ST model provides a forecast for how resources will be dispatched under expected conditions. While the IRP reflects the best available forecast, many factors ultimately drive PacifiCorp's emissions intensity. Gas prices and hydroelectric power variability are leading drivers of emissions and changes in these factors can cause significant deviations in actuals versus the forecast. While PacifiCorp is confident in the overall GHG reduction trend reflected in the 20-year emissions forecast, year-to-year actuals can fluctuate.

A. Methodology and Assumptions

In its 2025 IRP Update, PacifiCorp calculated emissions for its system using unit-specific emission factors. PacifiCorp included emissions for market purchases and proxy resources. While the 2025 IRP Update included state-allocated emissions for Oregon, the 2025 IRP Update did not include state-allocated emissions for PacifiCorp's other states. PacifiCorp's methodology to allocate emissions to California is generally based on the CARB methodology PacifiCorp uses for reporting under the Cap-and-Invest program.

PacifiCorp's California allocated system emissions factor is calculated by dividing the sum of total California allocated system emissions and market purchases emissions by the sum of total California allocated system generation and generation from market purchases. California allocated emissions are calculated by multiplying the California allocated system emissions factor by the difference between California retail sales post-Demand-Side Management (DSM) and generation from PacifiCorp's resources located within California. A couple of important components of PacifiCorp's California allocated emissions methodology include:

- PacifiCorp's California GHG methodology only considers resources cost allocated to California. PacifiCorp resources not cost allocated to California do not impact PacifiCorp's California GHG position.
- CO2 emissions for market purchases are calculated using the CARB default emissions factor (0.428 MT CO2e/MWh or 0.471 ST CO2e/MWh).
- The methodology does not account for a reduction in emissions attributed to sales.
- 2% transmission line losses are applied to California retail sales.

PacifiCorp believes this to be the soundest approach to meeting the intent and goals of the CSP tool of the IRP. As policy changes take place and modeling enhancements occur, PacifiCorp will continue to assess and improve its methodology.

B. Results of Proposed Modeling

As shown in Table A.1 below, PacifiCorp's 2025 IRP Update preferred portfolio does not meet the GHG benchmarks of 0.209 MMT in 2030, 0.175 MMT in 2035, 0.126 MMT in 2040, and 0.065 MMT in 2045 under the 30 MMT target for 2030 established in R.25-06-019 for the 2026 IRP cycle, as well as the 25 MMT target for 2035, 16.8 MMT target for 2040, and 8.68 MMT target for 2045.[20,21]

[20] PacifiCorp updated its California GHG calculation based on the 2025 IRP Update preferred portfolio. Specifically, PacifiCorp updated its California in-state generation to include Fall Creek - Klamath Falls, a resource that is physically located in the state of California that was not included in the 2025 IRP Update.

[21] SB 100 established California's requirement to achieve 60% renewable retail electricity sales by 2030 and a policy of 100% zero-carbon retail electricity by 2045. Subsequent CPUC Integrated Resource Planning proceedings adopted electric-sector greenhouse gas planning benchmarks, including a 46 MMT 2030 benchmark established in R.16-02-007. This benchmark was updated to 30 MMT for 2030 in R.25-06-019.

Table A.1 - 2025 IRP Update Preferred California Allocated GHG and Performance Against GHG Benchmarks

System Emissions from Resources Cost-Allocated to California											
2025 IRP Update - System Generation (GWh), 2027-2035											
Ln.#	Data		2027	2028	2029	2030	2031	2032	2033	2034	2035
1	Existing + Proxy System Resources	Generation (GWh)	57,510	56,587	55,438	45,166	44,779	43,083	43,379	43,816	43,453
2		Emissions (MMT CO2e)	26.391	25.195	24.760	19.379	16.847	15.655	15.948	16.089	16.004
3	Market Purchases	Volume (GWh)	2,334	2,134	2,856	3,992	4,020	3,611	3,813	3,696	4,022
4		Emissions (MMT CO2e)	0.999	0.913	1.222	1.708	1.721	1.545	1.632	1.582	1.721
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.4577	0.4446	0.4457	0.4290	0.3805	0.3684	0.3725	0.3719	0.3734
6		Retail Sales - Post DSM (GWh)	748	744	736	729	723	719	711	704	698
7		Retail Sale + 2% Transmission Loss (GWh)	763	759	750	744	738	733	726	718	712
8		California In-State Generation (GWh)	61	61	61	51	51	51	51	48	48
10		California Allocated Emissions (MMT CO2e)	**0.322**	**0.310**	**0.307**	**0.297**	**0.261**	**0.251**	**0.251**	**0.249**	**0.248**
11	**GHG Emission Target (MMT)**					0.209					0.175
2025 IRP Update - System Generation (GWh), 2036-2045											
Ln.#	Data		2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
1	Existing + Proxy System Resources	Generation (GWh)	44,377	45,235	46,172	44,731	45,487	45,369	46,994	45,834	46,583	48,611
2		Emissions (MMT CO2e)	15.470	16.444	16.058	15.368	14.957	16.027	17.022	18.056	18.222	19.579
3	Market Purchases	Volume (GWh)	3,994	4,298	4,383	4,521	4,816	6,080	6,177	6,502	7,296	6,852
4		Emissions (MMT CO2e)	1.710	1.840	1.876	1.935	2.061	2.602	2.644	2.783	3.123	2.933
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.3552	0.3691	0.3547	0.3513	0.3383	0.3621	0.3699	0.3982	0.3962	0.4059
6		Retail Sales - Post DSM (GWh)	695	693	692	690	692	689	690	690	692	691
7		Retail Sale + 2% Transmission Loss (GWh)	709	707	705	704	706	703	704	703	706	705
8		California In-State Generation (GWh)	48	48	48	48	48	48	48	48	48	48
10		California Allocated Emissions (MMT CO2e)	**0.235**	**0.243**	**0.233**	**0.230**	**0.222**	**0.237**	**0.243**	**0.261**	**0.260**	**0.266**
11	**GHG Emission Target (MMT)**						0.126					0.065

Because PacifiCorp's 2025 IRP Update preferred portfolio did not achieve the GHG benchmarks identified in R.25-06-019, PacifiCorp created its new "conforming portfolio" by adding a new proxy solar resource in northern California to increase California in-state generation. California's allocated emissions resulting from this new conforming portfolio are presented in Table A.2 below. As may be seen, adding a new solar resource in California to increase California in-state generation achieves the GHG benchmarks outlined in all years.

Table A.2 - California Allocated GHG and Performance Against GHG Benchmarks, In-State Generation

System Emissions from Resources Cost-Allocated to California											
Coal Reallocation - System Generation (GWh), 2027-2035											
Ln.#	Data		2027	2028	2029	2030	2031	2032	2033	2034	2035
1	Existing + Proxy System Resources	Generation (GWh)	57,510	56,587	55,438	45,166	44,779	43,083	43,379	43,816	43,453
2		Emissions (MMT CO2e)	26.391	25.195	24.760	19.379	16.847	15.655	15.948	16.089	16.004
3	Market Purchases	Volume (GWh)	2,334	2,134	2,856	3,992	4,020	3,611	3,813	3,696	4,022
4		Emissions (MMT CO2e)	0.999	0.913	1.222	1.708	1.721	1.545	1.632	1.582	1.721
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.4577	0.4446	0.4457	0.4290	0.3805	0.3684	0.3725	0.3719	0.3734
6		Retail Sales - Post DSM (GWh)	748	744	736	729	723	719	711	704	698
7		Retail Sale + 2% Transmission Loss (GWh)	763	759	750	744	738	733	726	718	712
8		California In-State Generation (GWh)	61	61	61	257	207	204	218	229	243
10		California Allocated Emissions (MMT CO2e)	**0.322**	**0.310**	**0.307**	**0.209**	**0.202**	**0.195**	**0.189**	**0.182**	**0.175**
11	**GHG Emission Target (MMT)**					**0.209**					**0.175**
Coal Reallocation - System Generation (GWh), 2036-2045											
Ln.#	Data		2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
1	Existing + Proxy System Resources	Generation (GWh)	44,377	45,235	46,172	44,731	45,487	45,369	46,994	45,834	46,583	48,611
2		Emissions (MMT CO2e)	15.470	16.444	16.058	15.368	14.957	16.027	17.022	18.056	18.222	19.579
3	Market Purchases	Volume (GWh)	3,994	4,298	4,383	4,521	4,816	6,080	6,177	6,502	7,296	6,852
4		Emissions (MMT CO2e)	1.710	1.840	1.876	1.935	2.061	2.602	2.644	2.783	3.123	2.933
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.3552	0.3691	0.3547	0.3513	0.3383	0.3621	0.3699	0.3982	0.3962	0.4059
6		Retail Sales - Post DSM (GWh)	695	693	692	690	692	689	690	690	692	691
7		Retail Sale + 2% Transmission Loss (GWh)	709	707	705	704	706	703	704	703	706	705
8		California In-State Generation (GWh)	245	287	294	317	333	388	428	480	511	544
10		California Allocated Emissions (MMT CO2e)	**0.165**	**0.155**	**0.146**	**0.136**	**0.126**	**0.114**	**0.102**	**0.089**	**0.077**	**0.065**
11	**GHG Emission Target (MMT)**						**0.126**					**0.065**

In addition to the conforming portfolio, PacifiCorp considered an alternative pathway to achieve PacifiCorp's California GHG benchmarks by increasing system generation with new clean resources in order to reduce the system emissions factor. Because system emissions remain unchanged in this alternative pathway, a significant increase in system generation is required to dilute the system emissions factor enough to achieve PacifiCorp's California GHG benchmarks. Table A.3 reveals that while this approach achieves the GHG benchmarks in all years, system generation must increase by over 20 million MWh to meet the GHG benchmarks in 2030 and 2035, 38 million MWh to meet the GHG benchmark in 2040, and 170 million MWh to meet the GHG benchmark in 2045. In reality, investing in significant new renewable resources would likely reduce generation from emitting resources, reducing system emissions and requiring fewer new clean resources to be added to reduce the system emissions factor. Still, the point stands that achieving the GHG benchmarks by increasing system generation with new clean resources may significantly increase costs for customers, especially compared to the conforming portfolio

approach presented in Table A.2 which would achieve the GHG benchmarks in 2030, 2035, 2040, and 2045 by adding an only 80.25 MW new nameplate solar resource in 2030, increasing to 193.4 MW to meet the GHG benchmark in 2045.[22] The in-state solar resource addition presented in the conforming portfolio (Table A.2) is approximately 1% of the addition that would be required through the approach presented in Table A.3 of increasing system generation with new clean resources.

Table A.3 - California Allocated GHG and Performance Against GHG Benchmarks, System Generation

System Emissions from Resources Cost-Allocated to California											
Compliant - Adding Out of State Generation (GWh), 2027-2035											
Ln.#	Data		2027	2028	2029	2030	2031	2032	2033	2034	2035
1	Existing + Proxy System Resources	Generation (GWh)	57,510	56,587	55,438	65,940	59,122	56,586	58,980	61,337	63,217
2		Emissions (MMT CO2e)	26.391	25.195	24.760	19.379	16.847	15.655	15.948	16.089	16.004
3	Market Purchases	Volume (GWh)	2,334	2,134	2,856	3,992	4,020	3,611	3,813	3,696	4,022
4		Emissions (MMT CO2e)	0.999	0.913	1.222	1.708	1.721	1.545	1.632	1.582	1.721
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.4577	0.4446	0.4457	0.3015	0.2941	0.2857	0.2800	0.2717	0.2636
6		Retail Sales - Post DSM (GWh)	748	744	736	729	723	719	711	704	698
7		Retail Sale + 2% Transmission Loss (GWh)	763	759	750	744	738	733	726	718	712
8		California In-State Generation (GWh)	61	61	61	51	51	51	51	48	48
10		California Allocated Emissions (MMT CO2e)	**0.322**	**0.310**	**0.307**	**0.209**	**0.202**	**0.195**	**0.189**	**0.182**	**0.175**
11	**GHG Emission Target (MMT)**					0.209					0.175
Compliant - Adding Out of State Generation (GWh), 2027-2035											
Ln.#	Data		2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
1	Existing + Proxy System Resources	Generation (GWh)	64,838	73,450	76,340	78,917	83,934	100,885	120,260	146,922	174,966	220,457
2		Emissions (MMT CO2e)	15.470	16.444	16.058	15.368	14.957	16.027	17.022	18.056	18.222	19.579
3	Market Purchases	Volume (GWh)	3,994	4,298	4,383	4,521	4,816	6,080	6,177	6,502	7,296	6,852
4		Emissions (MMT CO2e)	1.710	1.840	1.876	1.935	2.061	2.602	2.644	2.783	3.123	2.933
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.2496	0.2352	0.2222	0.2074	0.1918	0.1742	0.1555	0.1358	0.1171	0.0990
6		Retail Sales - Post DSM (GWh)	695	693	692	690	692	689	690	690	692	691
7		Retail Sale + 2% Transmission Loss (GWh)	709	707	705	704	706	703	704	703	706	705
8		California In-State Generation (GWh)	48	48	48	48	48	48	48	48	48	48
10		California Allocated Emissions (MMT CO2e)	**0.165**	**0.155**	**0.146**	**0.136**	**0.126**	**0.114**	**0.102**	**0.089**	**0.077**	**0.065**
11	**GHG Emission Target (MMT)**						0.126					0.065

Finally, PacifiCorp considered an alternative pathway to achieve PacifiCorp's California GHG benchmarks through reallocating system resources. In this alternative pathway, California

[22] Note that these values are proxy-based and it should not be inferred that this is a plan for specific procurement. The integrated planning process is one part of a larger process which includes procurement planning in downstream processes. Leading up to year 2030 there will be fundamental updates to integrated resource planning data and assumptions which will drive the timing, type, volume and location of indicative proxy resources.

is no longer allocated any shares of system coal resources. Table A.4 shows that while this approach achieves the GHG benchmarks in 2030 and 2035, removing coal from California's system resource allocation still does not achieve the GHG benchmarks in 2040 and 2045. Additionally, removing California from coal resources creates allocation challenges not accounted for in Table A.4. Removing California from coal resource allocations would require California to invest in new resources or increase their allocated share of other system resources. Beyond the regulatory challenges of changing resource allocations, removing California from coal resource allocations and increasing California's allocated share of other system resources or investing in new resources would almost certainly increase costs for PacifiCorp's California customers.

Table A.4 - California Allocated GHG and Performance Against GHG Benchmarks, System Resource Reallocation

System Emissions from Resources Cost-Allocated to California											
Coal Reallocation - System Generation (GWh), 2027-2035											
Ln.#	Data		2027	2028	2029	2030	2031	2032	2033	2034	2035
1	Existing + Proxy System Resources	Generation (GWh)	37,115	36,972	35,577	31,296	30,800	29,840	30,347	30,334	30,056
2		Emissions (MMT CO2e)	4.726	4.624	4.147	4.536	4.969	4.547	4.628	4.706	4.697
3	Market Purchases	Volume (GWh)	2,334	2,134	2,856	3,992	4,020	3,611	3,813	3,696	4,022
4		Emissions (MMT CO2e)	0.999	0.913	1.222	1.708	1.721	1.545	1.632	1.582	1.721
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.1451	0.1416	0.1397	0.1770	0.1921	0.1821	0.1832	0.1848	0.1883
6		Retail Sales - Post DSM (GWh)	748	744	736	729	723	719	711	704	698
7		Retail Sale + 2% Transmission Loss (GWh)	763	759	750	744	738	733	726	718	712
8		California In-State Generation (GWh)	61	61	61	51	51	51	51	48	48
10		California Allocated Emissions (MMT CO2e)	**0.102**	**0.099**	**0.096**	**0.123**	**0.132**	**0.124**	**0.124**	**0.124**	**0.125**
11	**GHG Emission Target (MMT)**					0.209					0.175
Coal Reallocation - System Generation (GWh), 2036-2045											
Ln.#	Data		2036	2037	2038	2039	2040	2041	2042	2043	2044	2045
1	Existing + Proxy System Resources	Generation (GWh)	32,111	32,709	33,970	32,738	34,444	33,764	34,278	35,281	35,832	36,913
2		Emissions (MMT CO2e)	5.329	5.608	5.944	5.469	6.083	6.168	6.391	6.979	7.060	7.390
3	Market Purchases	Volume (GWh)	3,994	4,298	4,383	4,521	4,816	6,080	6,177	6,502	7,296	6,852
4		Emissions (MMT CO2e)	1.710	1.840	1.876	1.935	2.061	2.602	2.644	2.783	3.123	2.933
5	California Emissions Calculation	System Emission Factor (MT CO2e/MWh)	0.1949	0.2012	0.2039	0.1987	0.2074	0.2201	0.2233	0.2336	0.2361	0.2359
6		Retail Sales - Post DSM (GWh)	695	693	692	690	692	689	690	690	692	691
7		Retail Sale + 2% Transmission Loss (GWh)	709	707	705	704	706	703	704	703	706	705
8		California In-State Generation (GWh)	48	48	48	48	48	48	48	48	48	48
10		California Allocated Emissions (MMT CO2e)	**0.129**	**0.133**	**0.134**	**0.130**	**0.136**	**0.144**	**0.146**	**0.153**	**0.155**	**0.155**
11	**GHG Emission Target (MMT)**						0.126					0.065