



**PacifiCorp's Comments on the Regional Issues Forum  
Draft Summary of Issues and June 19, 2019 Greenhouse Gas Workshop**

PacifiCorp submits the following comments to the Western Energy Imbalance Market ("EIM") Regional Issues Forum ("RIF") on the RIF's draft summary of issues ("Summary of Issues") related to the RIF's June 19, 2019, greenhouse gas ("GHG") workshop ("Workshop"). In answer to the questions raised by the Liaisons, PacifiCorp believes that it is beneficial for the RIF to organize future meetings and workshops related to carbon policies and their impacts. The RIF provides a unique opportunity for this discussion in its ability to include stakeholders across a broad spectrum, including state regulators, state policy makers, regional interest groups and industry personnel.

With regard to the topics that were outlined in the Summary of Issues document, PacifiCorp supports the concepts set forth in the Summary of Issues from the GHG Workshop and proposes that the RIF conduct a series of GHG educational workshops. What became clear in the Workshop for PacifiCorp was the fact that while state policy makers understand their legislation, they may not understand how an electricity market works and similarly, people in the power industry don't always understand the complexities and intent of state policies.

Providing an educational series that could focus on one or two potential topics at a time, presented on by different states, utilities, environmental agencies, etc., would provide an opportunity for industry stakeholders to discuss their points of view as well as gain the perspectives of others. Each workshop could focus on one GHG topic in order for stakeholders to have meaningful discussions and identify issues specifically related to that topic. For example, separate workshops could be conducted to discuss GHG pricing policies, renewable portfolio standards ("RPS") accounting, treatment of varying environmental attributes, GHG allocation of costs/benefits, and treatment of non-emitting resources outside of jurisdictions with GHG programs, among other specific GHG topics.

PacifiCorp appreciates the RIF's consideration of these comments and looks forward to further dialog.