



May 4, 2026

Submitted via CARB's online public comment form

California Air Resources Board
100 I Street
Sacramento, CA 95804

Re: PacifiCorp's Comments on CARB's 15-Day Notice on Cap-and-Invest Program and Mandatory Reporting Rule Changes

PacifiCorp d/b/a Pacific Power (PacifiCorp or company) respectfully submits the following comments in response to the California Air Resources Board's (CARB) 15-Day Notice for the Proposed Amendments to the Regulation for the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms and Proposed Amendments to the Regulation for the Mandatory Reporting of Greenhouse Gas Emissions.

I. Background and unique characteristics of PacifiCorp

PacifiCorp serves approximately two million customers in six western states (California, Idaho, Oregon, Utah, Washington, and Wyoming), including approximately 49,000 retail customers in California. CARB distributes no-cost allowances to PacifiCorp commensurate with the company's service of California retail electric customers. PacifiCorp is a covered entity under the Cap-and-Invest program as a California investor-owned electric utility and as an importer into the state through the Energy Imbalance Market (EIM). PacifiCorp is a committed participant in the California Independent System Operator's (CAISO) Extended Day-Ahead Market (EDAM), with a go-live date scheduled for May 1, 2026.

II. PacifiCorp appreciates CARB's revisions to PacifiCorp's allocation methodology

PacifiCorp appreciates CARB's modifications to the allowance calculation, which more accurately forecast the company's expected allowance obligation and reduce costs to retail electricity customers.

III. CARB should allow multijurisdictional utilities to report residential retail sales or detail how multijurisdictional utility residential retail sales will be calculated

CARB's 15-Day notice updates Section 95111(c)(1) of the Mandatory Reporting Regulation (MRR) to require retail providers to report total and residential retail sales, the latter of which will be used to calculate natural gas allowances transferred to electric distribution utilities. However, multijurisdictional retail providers report under Section 95111(d), which has not been updated to include the residential retail sales addition. PacifiCorp recommends CARB either modify Section 95111(d)(4) to read "Total and residential retail sales (MWh) to California customers served in California's portion of the service territory" or clarify how CARB will source residential retail sales data for multijurisdictional utilities.



IV. CARB should define “California balancing authority area” as part of the pseudo-tie definition update

CARB’s 15-Day notice updates the definition of “pseudo-tie” in Section 95102(a) of the MRR. The new definition includes the term “California balancing authority area”, which is not defined elsewhere. The terms “California balancing authority” and “balancing authority area” are defined but “California balancing authority area” is not. PacifiCorp recommends CARB define “California balancing authority area” to ensure multijurisdictional utility resources continue to not be considered pseudo-tied resources.

PacifiCorp appreciates the comment opportunity and looks forward to continued engagement in the CARB’s rulemaking.

Sincerely,
/s/ Mike Sullivan
Carbon Policy Advisor
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232
michael.sullivan@pacificorp.com