

# PacifiCorp - Stakeholder Feedback Form

## 2023 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2023 IRP, including, but not limited to the process, assumptions, and analysis. In order to maintain open communication and provide the broader Stakeholder community with useful information, the Company will generally post all appropriate feedback on the IRP website unless you request otherwise, below.

Date of Submittal 2023-05-01

\*Name: Nancy Kelly

Title: Senior Policy Advisor

\*E-mail: nkelly@westernresources.org

Phone: (208) 234 - 0636

\*Organization: Western Resource Advocates

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Public Meeting Date comments address: \_\_\_\_\_  Check here if not related to specific meeting

List additional organization attendees at cited meeting: \_\_\_\_\_

**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.

Variant Request 2

Check here if you do **not** want your Stakeholder feedback and accompanying materials posted to the IRP website.

**\*Respondent Comment:** Please provide your feedback for each IRP topic listed above.

Western Resource Advocates, Heal Utah, Idaho Conservation League, Powder River Basin Resource Council, and Utah Clean Energy request that PacifiCorp model the following variant. Requested Variant: Do not add SNCR to Hunter, Huntington, or Wyodak units; instead use reduced dispatch to comply with the OTR. Explanation: We are interested in understanding whether it is possible to comply with the ozone transport rule by reducing dispatch in lieu of adding pollution controls. Is it possible to reduce operations at the affected coal units in lieu of installing pollution control equipment and comply with the rule? If not, please explain why not. If so, please model a variant that uses reduced dispatch to comply with the OTR.

**Data Support:** If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated.

Western Resource Advocates, Heal Utah, Idaho Conservation League, Powder River Basin Resource Council, and Utah Clean Energy request that PacifiCorp model the following variant. Requested Variant: Do not add SNCR to Hunter, Huntington, or Wyodak units; instead use reduced dispatch to comply with the OTR. Explanation: We are interested in understanding whether it is possible to comply with the ozone transport rule by reducing dispatch in lieu of adding pollution controls. Is it possible to reduce operations at the affected coal units in lieu of installing pollution control equipment and comply with the

\* Required fields

rule? If not, please explain why not. If so, please model a variant that uses reduced dispatch to comply with the OTR.

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Please submit your completed Stakeholder Feedback Form via email to [IRP@PacifiCorp.com](mailto:IRP@PacifiCorp.com)

Thank you for participating.

PacifiCorp Response (5/30/23):

The ozone transport rule (OTR) allocates NO<sub>x</sub> allowances during the ozone season (May to September) based on historical heat input and historical NO<sub>x</sub> emissions and does not require specific control technology to be installed. The allocations, however, do not necessarily allow a unit to dispatch up to its maximum capacity during the ozone season. In the 2023 IRP, coal and natural gas units will limit generation on an optimized basis during the ozone season to comply with allocated allowances. The company notes that the cost of adding SNCR is considered minimal. The company has not conducted the suggested study but welcomes further discussion.

\* Required fields