

# PacifiCorp - Stakeholder Feedback Form

## 2019 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 2019 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 6/13/2019

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Public Meeting Date comments address: 5/20/2019

Check here if not related to specific meeting

List additional organization attendees at cited meeting:

Bentley Erdwurm

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

The following questions are related to the Portfolio Analysis Results presented during the May 20-21, 2019 Integrated Resource Plan (IRP) Public Input Meeting.

1. For Portfolio Development Cases P-03, P-04, P-05, P-06, P-07, P-08, P-09, P-10, P-11, and P-12 the Company assumes no SCR's being installed on Jim Bridger units 1 or 2 in exchange for shutting those units down earlier than their current useful lives. However, in some of the cases, specifically in Cases P-03, P-06, P-07, P-08, P-09, P-11, P-12, and P-13 the Company assumes that Wyoming DEQ, and the EPA will allow these units to operate for another 6 to 10 years without installing SCRs beyond the accepted 2021 and 2022 SCR installation dates. Please explain why the Company believes that it will be able to successfully negotiate operating units 1 & 2 without SCRs for those extended periods of time.

### **PacifiCorp Response:**

1.

Generally speaking, PacifiCorp is studying a number of portfolios with assumptions specific to regional haze and other compliance alternatives while having active discussions with Wyoming Department of Environmental Quality and the U.S. Environmental Protection Agency (EPA). While each location is unique, there are examples of the EPA approving reduced operating lives of coal units in lieu of installing selective catalytic reduction system (SCR) at dates that are between five to ten years longer than original designated SCR installation dates.

2. For Portfolio Development Cases P-06, P-07, P-09, P-10, P-11, P-12, and likely P-13 the basis for the portfolio considers a large conversion of Naughton unit 3 to burn natural gas. In the December 3-4, 2018 IRP meeting the Company assumed that Naughton Unit 3 would retire at the end of 2019 (see presentation Stacked-Retirement Cases, page 58 footnote).

a. Please explain why the Naughton unit 3 large gas conversion was not considered or selected during the coal unit studies.

### **PacifiCorp Response:**

2a.

\* Required fields

PacifiCorp did not study gas conversion of Naughton Unit 3 during the coal studies, as those studies were focused solely on assessing the economic net benefits or costs of early retirement of individual units and additional stacked units. To comply with regional haze requirements, Naughton Unit 3 has been shut down since January 30, 2019. PacifiCorp studied gas conversion of Naughton Unit 3 in the 2017 Integrated Resource Plan (IRP) and 2017 IRP Update and committed in its action plan to provide additional updates and study of gas conversion in future IRPs, including the 2019 IRP.

b. Please explain whether or not, and if so how, the change of Naughton unit 3 for a large conversion to burn natural gas affects the relative unit comparison results of the coal unit studies.

**PacifiCorp Response:**

2b.

Please see response to part 2a above. It has no effect on the relative unit comparison results of the coal studies completed in April 2019.

c. Please explain any changes to model inputs or variables that contributed to selecting the large gas conversion of Naughton 3 in contrast to the assumed retirement of Naughton Unit 3 in the previous coal unit studies.

**PacifiCorp Response:**

2c.

The gas conversion of Naughton Unit 3 (large or small) is one of many potential resource combinations studied in the portfolio development phase of the 2019 IRP and is not a selection by the model. The resulting net benefit or cost of a portfolio that includes a Naughton Unit 3 gas conversion will be considered relative to other portfolios during the portfolio development phase.

d. What studies were used by the Company for assessing the requirements and cost for converting Naughton Unit 3 to fire the boiler with natural gas?

**PacifiCorp Response:**

2d.

PacifiCorp developed cost assumptions associated with gas conversion through issuance of a request for proposal for the gas conversion and further conversations with the gas pipeline company to estimate costs to deliver additional gas requirement to fuel a limited converted gas unit.

e. Given the potential Naughton Unit 3 conversion to natural gas, would the modifications prevent the unit from being fueled by coal to some degree at a later point in time?

**PacifiCorp Response:**

2e.

Yes, Naughton Unit 3 ceased operation as a coal unit on January 30, 2019 in compliance with the Wyoming Regional Haze State Implementation Plans as approved by EPA and the plant's Title V permit and would not be able to be run as coal in the future. All capabilities for coal fueling to Naughton Unit 3 have been disabled as of January 30, 2019 per permit requirement.

f. Are there other Company owned coal units where conversion to natural gas has been studied. If so please explain details of the analysis.

**PacifiCorp Response:**

2f.

PacifiCorp studied gas conversion of Cholla Unit 4 in the 2017 IRP Update. Please see Chapter 6, Regional Haze Cases from the 2017 IRP Update for more information.

\* Required fields

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Check here if any of the following information being submitted is copyrighted or confidential.

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

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

[Click here to enter text.](#)

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**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.

[Click here to enter text.](#)

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

[Click here to enter text.](#)

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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.

\* Required fields