

# 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 5/15/2019

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\*Organization: Wyoming Coalition of Local Governments and Lincoln County

Address: Click here to enter text.

City: Click here to enter text. State: Wyoming Zip: Click here to enter text.

Public Meeting Date comments address: 4/25/2019  Check here if not related to specific meeting

List additional organization attendees at cited meeting: Click here to enter text.

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**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.  
April 25, 2019 Updated Coal Analysis

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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.

1. In December, PacifiCorp indicated that they would assess alternative retirement dates for the least economic coal plant units (2022, 2025, 2028, and 2031). Does PacifiCorp still plan to assess these alternative retirement dates?

2. We understand that the additional analysis that PacifiCorp has not yet performed includes Energy Gateway transmission cases.

2a. Does PacifiCorp intend to change the Energy Gateway West transmission line project? If so, then how will PacifiCorp change the transmission line, by schedule, route or in service dates?

2b. The proposed early retirement of the Naughton and Bridger units would free-up the capacity on the existing transmission line. Is it necessary to complete Gateway West by December 2020 if the coal plants are retired?

2c. If PacifiCorp still plans to complete the line to Bridger by December 2020, how has the delay in the construction plan submitted to the Wyoming Public Service Commission ("PSC") in June 2017 affect the deadline?

3. Are the transmission line and wind projects still scheduled to be completed by December 2020?

3a. Has the construction for these projects started? The original filing before the Wyoming PSC showed construction would start in November 2018.

3b. Will PacifiCorp consider in its risk assessment of replacement resources for coal the possibility of the transmission line and wind projects not being completed in time to receive 100% of the benefits of the production tax credit?

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\* Required fields

4. PacifiCorp also plans to analyze regional haze compliance alternatives for the next meeting. In the current coal analysis, is the cost of environmental upgrades considered in the emissions cost saving from retiring the unit?
  - 4a. What are the factors to be considered in regional haze compliance alternatives?
  - 4b. Does the cost savings analysis include the future risk of a carbon tax?
5. What is included in the decommissioning cost of retiring a coal plant unit?
  - 5a. Is PacifiCorp including the reclamation cost of closing a coal plant, including the cost to remediate the coal ash disposal sites?
  - 5b. Has PacifiCorp identified the source of elevated readings of arsenic, cadmium, and radium at the groundwater monitoring sites?
  - 5c. Naughton 3 was put on standby in January 2019, when will PacifiCorp begin actual closure and redemidation?
  - 5d. What are the estimated costs of plant decommissioning and do they include remediation of coal ash?
6. What will the reclamation schedule for the coal plants look like?
  - 6a. What about the reclamation of captive mines that PacifiCorp owns all or a share of?
7. How will the community impact of retiring the coal plants inform or add to the analysis of whether to retire the coal plants early?
  - 7a. How do these secondary and tertiary impacts caused by coal plant retirements influence retail and wholesale rates born by PacifiCorp customers?
8. In January 2019, PacifiCorp had indicated that there were limited power storage options for the wind farms and the batties could store about four hours when the turbines cannot operate due to too little or too much wind. PacifiCorp also stated that it was working on a better solution. In less than three months, to model presented on April 25, 2019 relies heavily on batteries on batteries to meet reliability requirements in the early years as shown in the stacked cases C-36 through C-43 in the April 2019 presentation.
  - 8a. Has there been a technological breakthrough in storage?
  - 8b. What else changes in the model to produce reliance on batteries as a near-term solution to meet variability and system demands?
  - 8c. Is this in addition to the amount of battery storage (about 200 to 600 MW depending on the stacked case) used annually to replace the lost capacity from early coal retirement?
  - 8d. Are their enough batteries out there currently to store this amount of power for long enough to still be reliable?
  - 8e. What will be the cost and how does this affect the rate structure?
9. To what extent, if at all, have models implementing battery storage accounted for recent, and significant, explosions of lithium batteries and what risk do such explosions pose to reliability of stacked cases mentioned above?
10. PacifiCorp is not proposing to accelerate the planned retirement of its entire coal fleet. The focus on the Naughton Plant that uses Kemmerer coal shows that PacifiCorp proposes to retire the highest quality coal first. How has the quantity and quality of various classes of coal in different parts of the region factored into the retirement analysis?
11. In the analysis of cost savings, what were the discrete factors considered?
  - 11a. Does the savings calculation include the potential for a carbon tax proposed in 2017 and 2018?
  - 11b. If the savings calculated included the risk of a carbon tax, what percent of the savings is it?
  - 11c. Does the savings calculation reflect the lower taxes that RMP would pay to the State of Wyoming and Lincoln and Sweetwater Counties?
  - 11d. How much did RMP pay the State of Wyoming in severance taxes for its coal mine properties in Sweetwater County in 2018?
  - 11e. How much does RMP pay in federal royalties?
  - 11f. How much did RMP pay Lincoln and Sweetwater Counties in special use taxes in 2018 and 2017?

\* Required fields

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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. The Coalition recommends that PacifiCorp conduct an analysis for the IRP that takes into account the fact that FERC may require new capacity resources (e.g. wind utilities, solar utilities, etc.) to offer their capacity at prices that are at or above a price floor set for each type of resource. FERC has adopted a Minimum Offer Price Rule as the “standard solution” to address the impacts of state policies on the wholesale capacity markets and thus PacifiCorp must evaluate the impact of a MOPR in its IRP. See Connecticut Dep't of Pub. Util. Control v. F.E.R.C., 569 F.3d 477, 484 (D.C. Cir. 2009) (“Where capacity decisions about an interconnected bulk power system affect FERC-jurisdictional transmission rates for that system without directly implicating generation facilities, they come within the Commission's authority.”).

The Coalition also recommends that PacifiCorp revise its analysis to consider what would occur if the renewable resource mandates from other states were set aside as unconstitutional. See Wyoming v. Oklahoma, 502 U.S. 437 (1992) (holding that Oklahoma statute that limits import of no more than 10% of Wyoming coal was unconstitutional since the discrimination was not demonstrably justified by a valid factor unrelated to economic protectionism).

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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.