

# PacifiCorp - Stakeholder Feedback Form

## 2021 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 2021 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 2020-12-17

\*Name: Shannon Anderson

Title: \_\_\_\_\_

\*E-mail: sanderson@powderriverbasin.org

Phone: 3077630995

\*Organization: Powder River Basin Resource Council, National Parks Conservation Association, & Healthy Environment Alliance of Utah (HEAL Utah)

Address: 934 N. Main St.

City: Sheridan

State: \_\_\_\_\_

Zip: 82801

Public Meeting Date comments address: 12-03-2020

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.  
Regional Haze Compliance

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.

Powder River Basin Resource Council, National Parks Conservation Association, and HEAL Utah, recommend Pacificorp model a reasonable range of likely pollution control requirements necessary to comply with the federal regional haze program. Continued litigation over past regional haze requirements, along with a new incoming federal administration, create uncertainty regarding the stringency and timing of pollution controls that will be implemented during the IRP planning window. To adequately capture a reasonable range of regulatory risks, we request model runs that incorporate SCR controls at Jim Bridger 1 & 2, Wyodak, Naughton 1 & 2, and all 5 units at Hunter & Huntington, as more fully described below.

**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.

This request is supported by the current FIP for Wyoming round 1 regional haze and the prior FIP for Utah round 1 regional haze previously approved by EPA.

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

For Jim Bridger 1 & 2 and Wyodak, PacifiCorp should consider SCR requirements included in the current FIP. Since these SCRs are currently required by the FIP, they are part of the business as usual/base case. For Naughton 1 & 2, PacifiCorp should consider SCRs as part of the second planning period, to be installed no later than December 31,

\* Required fields

2025. While PacifiCorp may think no additional controls will be needed and compliance can occur through capacity reductions, a Biden Administration EPA will likely require SCRs. For Hunter & Huntington, PacifiCorp should consider SCRs on all 5 units, to be installed no later than December 31, 2024. Although EPA recently finalized a new SIP BART Alternative, and the previous FIP required SCRs on 4 units. And SCR could be deemed necessary at Hunter 3 under the reasonable progress program. There is significant regulatory risk in ignoring the likelihood of 5 SCRs in Utah, given the amount of visibility impairing pollution and the proximity to Class 1 areas (national parks and wilderness). SCRs continue to be required to comply with regional haze at coal units across the country as the best way to reduce NOx emissions. The Utah plants are no exception. Should PacifiCorp wish to consider retirement as an alternative compliance option instead of installation of SCR, please model a retirement for the unit no longer than the dates discussed above. If alternative retirement dates are used, please provide an explanation of why they are chosen. PacifiCorp should provide information to stakeholders regarding where the SCR investment costs are being included in its modeling (e.g. which operating variants, and during which time periods for each operating variant).

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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