

# PacifiCorp - Stakeholder Feedback Form

## 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 call, 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 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 post appropriate feedback on the IRP website based on your selection below.

Date of Submittal 2024-08-09

\*Name: Stanley Holmes

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

\*E-mail: stholmes3@xmission.com

Phone: \_\_\_\_\_

\*Organization: Utah Citizens Advocating Renewable Energy (UCARE)

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

City: Salt Lake City

State: UT

Zip: \_\_\_\_\_

Public Meeting Date comments address: \_\_\_\_\_

Check here if 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.

PLEXOS Modeling and Differential Coal Quality Cost Impacts



Check here if you want your Stakeholder feedback and accompanying materials posted to the IRP website.

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

A review of the 2023 IRP documents suggests that PLEXOS modeling does not distinguish between different quality grades of coal that may be used in PacifiCorp electricity generation units; nor does PLEXOS analyze how fuel quality gradients could factor into least-cost, least-risk portfolio selection. Variations in sulfur, ash minerals, and moisture content between coal grades could significantly affect costs associated with coal supply acquisition and inventory maintenance, greenhouse gas emissions reduction, and waste disposal among other considerations. Coal grades vary not only between mines but sometimes within the same mine, with some customers getting the preferred grade and others purchasing lower quality coal. In Utah, PacifiCorp EGUs might face price competition with Bonanza and Intermountain Power Project (IPP) coal EGUs --plus foreign exports-- for the best grades of coal, which may sometimes be in short supply. The Intermountain Power Authority, which owns IPP, has reported to Utah state entities that "coal costs are rising significantly" and that it "hasn't received its contracted [coal] tonnage requirements from suppliers for at least nine years." Unsatisfied with the quality of coal received from Wyoming, IPA has imported coal from as far away as Indiana. The Jackson Walker Final Report for Feasibility of Intermountain Power Plant gives an idea of the coal quantity and quality issues facing operators of coal EGUs in Utah. The 2025 IRP should address variations in least-cost, least-risk factors if PacifiCorp coal EGUs burn different fuel grades, given what inventory and availability conditions may suggest or necessitate. For the 2025 IRP, please specifically identify and, for comparative resource cost purposes, assess: 1) Grades and amounts of coal currently being used in PacifiCorp EGUs...by individual EGU and in total. 2) Sources of coal from which PacifiCorp currently purchases, and could purchase, fuel. This includes sources where PacifiCorp has a proprietary interest, such as the Fossil Rock Mine (aka. Cottonwood Tract; formerly Mountain Trail Mine), and those sources that are third-party owned. 3) Modeling assumptions and sensitivity scenarios for: ... the use of different grade

\* Required fields

coal fuels and the MWh production costs by grade; ... conditions where competition for better grade fuel significantly increases costs of acquisition; ... costs to reduce emissions and other pollutants resulting from the use of lesser grade fuels; and, ... potential additional operations and maintenance costs, and accident liability costs, resulting from reopening geologically challenged mines, such as Fossil Rock Mine.

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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.

IPA purchases coal from Indiana: <https://www.argusmedia.com/en/news-and-insights/latest-market-news/2595473-utah-power-plant-takes-illinois-basin-coal> Jackson Walker Report on IPA/IPP: <https://le.utah.gov/interim/2023/pdf/00004542.pdf> March 21, 2024 SITLA Agenda (Cottonwood Tract / Fossil Rock Mine): <https://www.utah.gov/pmn/files/1098477.pdf> SITLA's royalty rate reduction incentive to reopen Fossil Rock mine: <https://www.utah.gov/pmn/files/1103161.pdf>

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

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**Response (8/28/2024):**

- The PLEXOS model used in the development of the IRP accounts for coal cost on a BTU-adjusted basis. The effect of other coal quality characteristics, such as Sulfur content, Ash content, etc., on plant operations are manifest in the operations & maintenance costs assumed for each individual coal unit. These costs are included as variable costs in the PLEXOS model.
- For clarification purposes, PacifiCorp does not own mines in Utah, including the Fossil Rock mine.
- The Company is considering using high coal costs in the high gas/high CO2 case, where the proposed high coal costs would be three times the expected costs.

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

Thank you for participating.