



PublicService Commission &lt;psc@utah.gov&gt;

## UCARE Comment, Docket #23-035-10, RMP Extension Request

1 message

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March 9, 2023

Dear PSC Commissioners,

As representatives of UCARE and customers of Rocky Mountain Power / PacifiCorp ("RMP-PacifiCorp"), we encourage you to approve the utility's request for an extension of its 2023 Integrated Resource Plan (IRP) filing deadline to May 31, 2023. With the extension, the utility should have more than enough time to adjust additional modeling input and output factors associated with the Ozone Transport Rule, Oregon and Washington clean

energy statutes, the Inflation Reduction Act, and resource interconnection rules. If granted the requested extension, RMP-PacifiCorp's presentation to stakeholders at the meeting to be scheduled before May 31, 2023 should include responses to the questions listed below and explain necessitated changes made to the draft IRP during the extension period.

As stakeholders, we seek clarification of items that may affect utility costs, options, and IRP resource decisions. We also want to know where these items will be available for public review in the 2023 IRP and its support documents. In light of the additional time provided to complete the IRP, we would appreciate RMP-PacifiCorp answering the following questions:

1) How financially invested is RMP-PacifiCorp in Utah's legal challenge of the EPA's updated Cross-State Air Pollution Rule (CSAPR), also Ozone Transport Rule; and to what extent will the utility match the Utah legislature's 2023 litigation appropriation of \$2 million with corporate funds? [1]

Utility spokesman Thom Carter is quoted as saying "We, Rocky Mountain Power, plan to fully litigate this rule. We are marshaling all of our resources to put up the fight.." [2] From which RMP-PacifiCorp account(s) would those litigation resources be acquired?

2) Similarly, to what extent has RMP-PacifiCorp committed resources to the Utah attorney general's actions that include: the FERC challenge of Vanguard Group's alleged "environmental activism" regarding Berkshire Hathaway and climate information disclosures for RMP power plants; and, the lawsuit against President Biden's 2021 executive order on the social cost of greenhouse gases (SC-GHG)? [3][4]

3) To what extent do modeling changes planned during the requested extension period incorporate sensitivity factors to address potential resource impacts ensuing from outcomes of situations referenced in 1) and 2) above?

The next four questions, 4) through 7), are prompted by an article accessed through Utility Dive: "Getting politics out of utility bills." [5]

4) What dollar amount in the RMP-PacifiCorp budget during the 2023 IRP process is designated for public relations materials (including for print and electronic media advertising, postage) and compensation for employees and consultants? And, where will that resource allocation be located in the IRP documents?

5) What dollar amount in the RMP-PacifiCorp budget during the 2023 IRP process is designated for legal staff, consultants, and related expenses, including federal litigation?

6) What is the total dollar amount in the RMP-PacifiCorp budget during the 2023 IRP process designated for lobbying local, state, and federal officials?

7) What is the ratio of corporate shareholder-to-ratepayer financial obligation for public relations, legal, and lobbying expenses during the 2023 IRP cycle?

8) Where in the 2023 IRP documents will the public be able to access a granular data description of calculations used to quantify social cost of greenhouse gases (SC-GHG) as per RCW 19.280.030(3)(a.) and RCW 80.28.405? [6]

9) In contrast to the 2021 IRP's SC-GHG focus exclusively on carbon dioxide emissions, to what extent will the 2023 IRP development of SC-GHG price scenarios include **all** greenhouse gas emissions including nitrous oxide and the methane generated from RMP-PacifiCorp's procurement supply chain as well as CH4 emissions from the utility's energy generation units?

10) The 2021 IRP notes that "market transactions at the Mid-Columbia market do not reflect the social cost of greenhouse gases and PacifiCorp does not directly incur emission costs at the price assumed for the social cost of greenhouse gases." [7] To what extent have these conditions changed in ways that could impact resource assumptions as portfolios are developed for the 2023 IRP?

11) Which long-, medium-, and short-term models and schedules will be used to evaluate each portfolio's cost, risk, and reliability analysis among SC-GHG price scenarios?

12) Where PacifiCorp kept all LT, MT, and ST studies filings "CONFIDENTIAL" in the 2021 IRP, to what extent will modeling information and risk-adjustment metrics be accessible for public review during the 2023 IRP

process?

As the 2023 IRP process unfolds, UCARE asks that the Utah Public Service Commission operationalize the finding in its June 18, 1992 Order in Docket 90-2035-01 that "the free flow of information between parties is beneficial to the IRP process and concludes that Information Exchange approach to IRP, supplemented with appropriate documentation, will be used in Utah." Where RMP-PacifiCorp's stakeholder presentations and IRP fail to provide information sought through this comment, we are reminded of the PSC's Standards and Guidelines declaration that "the Commission reserves the right to request additional information and studies that might aid in its evaluation of the planning process." [8]

We ask you to grant RMP-PacifiCorp the extension they have requested so that they may generate the additional information and responses to the questions listed above and present all to interested stakeholders prior to May 31, 2023.

Thank you.

Sincerely,

/s/ Stanley Holmes  
UCARE Outreach Coordinator

/s/ David Bennett  
UCARE Consultant

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