- To: Public Service Commission Heber M. Wells Building, 4<sup>th</sup> Floor 160 East 300 South Salt Lake City UT 84111
- From: Salt Lake County Mayor Corroon
- Re: In Matter of the Acknowledgement of PacifiCorp's Integrated Resource Plan 2007 Docket No. 07-2035-01

Dear Commissioners:

Salt Lake County appreciates the opportunity to provide comments on PacifiCorp's Draft 2007 Integrated Resource Plan (IRP). Salt Lake County is working to address a number of environmental and energy-related issues within our jurisdiction and striving to be a leader for best practices in clean energy, water, and land use. Given the profound impacts of climate change, energy security and air pollution on the well-being of the citizens of Salt Lake County, we are supportive of those decisions that provide economic benefits without compromising the quality of the environment, both locally and regionally. We recognize the immense amount of time, energy, and effort that has gone into the IRP process, and we commend PacifiCorp for taking some initial steps to address the aforementioned issues and incorporate more renewable energy in their portfolio.

Salt Lake County, however, respectfully submits these comments to acknowledge our concerns with the current IRP. While we understand the difficulty of addressing Utah's growing energy needs, the IRP process does not account for the risks to public health and the environment (i.e. externalities) associated with continued reliance on conventional fossil fuel technologies.

Salt Lake County encourages a diversified portfolio of energy resources that support current technologies, but strongly support the creation of new resources that do not exacerbate air and water pollution, risks to public health, energy security, and global climate change (i.e. renewable resources and energy efficiency). Namely, we would like to see the IRP incorporate Solar Photovoltaic (distributed and commercial) and Concentrating Solar, which were not given due consideration in the IRP's analyses. These resources have the ability to meet Utah's rising peak demand without undue harm to the environment, helping to minimize the risks to Utah ratepayers now and in the future; we would like the IRP to analyze and acknowledge the full benefits of these and other renewable resources. Salt Lake County is already partnering with Rocky Mountain Power to explore these types of systems and this should be reflected in the IRP. Additionally, Salt Lake County would like to see the IRP consider all renewables separately, rather than using wind energy as a surrogate for all renewable technologies. Solar, geothermal, wind and other renewables all have different cost, dispachability, technology and carbon risk profiles, and should be considered individually.

Again, we appreciate the hard work that has gone into the IRP process and commend PacifiCorp for its initial commitment to voluntarily increasing its renewable energy profile. However, given the above concerns, Salt Lake County respectfully requests that the Public Service Commission reviews our comments on the 2007 Integrated Resource Plan and consider revision to include a more complete analysis of the externalities associated with conventional power generation and the added benefits that renewable energy technologies and aggressive deployment of energy efficiency bring to the residents of Salt Lake County and the state of Utah.

Sincerely,

Peter M. Corroon Salt Lake County Mayor