

Attention: Public Service Commission of Utah
August 25, 2015

Dear Commissioners:

Below are Breathe Utah's comments for your consideration in the matter of Docket No. 15-035-04. Breathe Utah provides expertise in air quality, including regulation, health and engineering research results, and government policies. Breathe advocates for and implements clean air programs, cooperates with and works with Legislators, and educates over 3,000 school children and the general public every year.

The State of Utah is an area with a very high degree of untapped renewable energy potential. Considering current EPA standards and the real, worldwide need to control carbon emissions, plus the pressing Utah need to keep our air clean (from the visibility standpoint near national parks, from the climate impact standpoint, for economic health, and of course for public health), it would be poor public policy to allow Rocky Mountain Power to make a long term commitment to coal. Nevertheless, Rocky Mountain Power is not planning on building any new renewables [except what they are required to purchase--close to 1000 MW of solar in southern Utah--largely based upon their case vs. Utah Clean Energy in 2013].

In its **20-year plan** presented to state regulators, **Rocky Mountain Power [and its parent company PacifiCorp] has made it clear that they want to continue burning increasingly environmentally expensive coal as its main power source for years to come.** This is risky for Utah ratepayers, our environment, and public health. As time passes, more regulation of coal burning is entirely predictable. Expenses (via fees, pollution controls, etc.) will increase rapidly, and be reflected in the prices charged per KWH by Rocky Mountain Power. This cannot be in the best interest of the State of Utah.

There is an excellent alternative. PacifiCorp has modeled accelerated acquisition of energy efficiency; the utility found that increased and faster investments in energy efficiency programs resulted in a cheaper, less risky energy portfolio. Pursuing that would be helpful to Utah ratepayers and our environment. PacifiCorp also modeled an expanded solar rebate program in Utah; their model showed expanding the utility's rebate program would be an effective part of a least cost, least risk plan for ratepayers.

PacifiCorp's resource plan does not include any "utility-scale" renewables until 2024, as they perhaps don't recognize the reliability, risk mitigation, and cost benefits that renewable energy would bring to its system; and the utility has proposed using only "unbundled" renewable energy credits, instead of actual generation resources, to meet its RPS obligations until 2024. In addition, Rocky Mountain Power has recently discussed [via customer polling] some possible "community solar," but is not implementing that in their plan. The Wasatch Front, the heaviest energy using region in the state, has a plethora of correctly oriented rooftops. By placing their

own solar on these existing roofs and maintaining the units, collecting the energy becomes easy and very reliable. That in our opinion is a better outcome than more coal burning.

In addition to the above direct Rocky Mountain Power comments, we are also aware that the United States Bureau of Land Management has been accepting comments regarding expansion of coal plants on its property. The coal is mediocre quality, and is burned by PacifiCorp near a national park (affecting air quality and creating haze), but even this cheap coal may not be available to them. We hope the PSC will make sure it looks at the full cost-risk trade-offs for all Rocky Mountain Power's old coal plants.

Respectfully submitted by
Deborah Sigman, President, for the Board of Directors of Breathe Utah
P.O.Box 522435, Salt Lake City Utah 84152
www.breatheutah.org