Docket No. 19-057-33 – Natural Gas Clean Air Project & IIAC Funding

Technical Conference on February 5, 2020

Questions from the Utah Office of Consumer Services

1. Line 91 of Dr. Powell's testimony states that for the proposed clean air project, the majority of the estimated annual 253 tons of NO_X reduction will be coming from the grid (i.e. reducing NO_X emissions from PacifiCorp's generating fleet). Please provide a breakdown of NO_X reduction occurring locally versus from the locations on the grid. Please explain and show how these NO_X reductions were calculated.

2. Dr. Kelly's testimony explains that the EPA has classified the Wasatch Front, the Cache Valley and the Uinta Basin as non-attainment areas in Utah. Please discuss how the proposed clean air project will improve air quality in these areas. In this discussion, please include the total annual tons NO_X reduction and the % annual NO_X (or other emissions) reduction in each of these three non-attainment areas as a result of the proposed clean air project.

3. Line 46 of Dr. Kelly's testimony states that 18% of Utah's electricity generation occurs in the greater Wasatch Front. Please identify these generation sources in the greater Wasatch Front and explain how the proposed clean air project will reduce electricity generation from these sources. Does the 18% figure consider the actual capacity factor of each generation source?

4. Pages 3 & 4 of Dr. Kelly's testimony states that emission control measures in Utah's state implementation plan (SIP) cost between $5,000 and $70,000 per ton of emissions reductions and that the projected cost of the proposed clean air project is $15,000 per ton.

    a. Please show how the $15,000 per ton was calculated.
    b. Please discuss some of the typical types of control measures that have been implemented as a result of Utah's SIPs and how these measures compare to the proposed clean air project in terms of emissions reductions, costs and useful lives.

5. Dr. Kelly's testimony on line 79 states that the CHP project will have a 25-year life.

    a. How does this compare to the remaining lives of the other facilities on this site?
    b. Is it possible that the CHP unit will not be needed (i.e. operating) before the end of its 25-year life?
    c. How do shorter lives for the CHP unit affect the cost/benefit analysis?
    d. Has the project owner (or DEU and UofU) considered electrification of the boiler process at some time in the future and the implications of future electrification on the proposed clean air project?

6. PacifiCorp's 2019 IRP shows the electric utility closing coal plants early and moving faster into renewable energy and battery storage. Considering that this will happen, please explain why installing better SCRs or other emission controls on the existing boiler facility would not be a more cost effective solution to improve air quality along the Wasatch Front.

7. In his testimony Mr. Orton explains that the IIAC is currently receiving $370,000 of annual funding from the DOE and DEU proposes to provide $800,000 per year of additional funding or a 216% increase. Please show how the $800,000 per year was determined and explain in some detail how the funds will be spent.