

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application )  
of PacifiCorp for Approval ) Docket No. 03-035-14  
of an IRP Based Avoided Cost )  
Methodology for QF Projects )  
Larger than 1 MW )

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**Comments of Utah Clean Energy and Western Resource Advocates  
On Information Presented During Public Witness Period**

Utah Clean Energy (UCE) and Western Resource Advocates (WRA) request that the Utah Public Service Commission (Commission) accept the following comments on the evidence presented during the public witness period in this docket. The evidence and testimony raises important issues concerning the cost assumptions and economic value of wind to the PacifiCorp system that should be reflected in the IRP and DRR methodologies for evaluating QF wind and non-QF wind resources in this docket and in the IRP process.

WRA and UCE support concept of reflecting locational transmission pricing in the evaluation of wind resources from different geographical locations. WRA and UCE did not submit expert testimony on this issue and are therefore not offering a specific recommendation on how this should be done. However, WRA and UCE are active supporters of the Blue Sky program and are aware of the tremendous community support within Utah for renewable energy development in the state. In addition, WRA and UCE support the geographic diversity of

renewable energy resources to include new wind power development in Utah. We therefore recommend that the Commission take the steps necessary to reflect the potential transmission cost advantages of Utah wind in its evaluation of those resource options in the QF and IRP processes.

WRA and UCE also concur with the evidence presented on public witness day that PacifiCorp's evaluation of the capacity contribution of wind should be revised to reflect wind's contribution towards system reliability during all months of the year. We expressed a similar concern with the Company's evaluation of wind in our comments on PacifiCorp's final 2004 IRP. While we support the Company's current use of the effective load carrying capability (ELCC) methodology for evaluating wind's capacity contribution, the data set used with that methodology should be revised to look at wind's contribution to system reliability in all months of the year, and not solely during a single peak summer month. We recommend that the Commission direct PacifiCorp to revisit this issue in its evaluation of QF and non-QF wind resources.

Respectfully Submitted,

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