

Rocky Mountain Power
Supplemental Exhibit RMP___(CSW-4SR)
Docket No. 12-035-92
Witness: Cathy S. Woollums

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Exhibit Accompanying Surrebuttal Testimony of Cathy S. Woollums

March 2013



March 5, 2013

Ms. Nancy E. Vehr
Sr. Asst. Attorney General
Wyoming Attorney General's Office
123 Capitol Building
Cheyenne, WY 82002

Mr. Steven A. Dietrich
Air Quality Division Administrator
Wyoming Dept. of Environmental Quality
122 West 25th Street
Cheyenne, WY 82002

Dear Ms. Vehr and Mr. Dietrich:

As a result of the Environmental Protection Agency's upcoming re-proposal of its action on the Wyoming Regional Haze State Implementation Plan (SIP), significant questions have arisen regarding PacifiCorp's obligations to comply with the current compliance deadlines for selective catalytic reduction (SCR) controls at Jim Bridger Units 3 and 4 as contained in the SIP and the Settlement Agreement entered into by PacifiCorp and the Wyoming Department of Environmental Quality in November 2010. The agreements referenced require installation of SCR at Jim Bridger Units 3 and 4 by December 31, 2015, and December 31, 2016, respectively.

During our meeting on January 4, 2013, PacifiCorp posed the following questions to the Wyoming Department of Environmental Quality, Air Quality Division: (1) Does PacifiCorp need to comply with all terms and conditions of the Wyoming SIP prior to EPA action; and (2) will the Air Quality Division consider extending the deadlines for the installation of the SCR at Jim Bridger Units 3 and 4. The Air Quality Division responded that (1) under state regulations, PacifiCorp is required to comply with all terms and conditions of the Wyoming SIP notwithstanding the fact that EPA has not taken action; and (2) that the Air Quality Division considers the requirements to install the Jim Bridger Units 3 and 4 SCR controls as being independently legally enforceable and that the timing of the reductions are necessary to meet the state's requirements to achieve reasonable progress under the regional haze program's requirements.

PacifiCorp hereby requests that the Wyoming Air Quality Division reconsider PacifiCorp's request to change the deadlines for installation of the Jim Bridger Units 3 and 4 SCR controls

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from December 31, 2015 and December 31, 2016, to five years after EPA's approval of the Wyoming SIP or FIP issuance.

Your prompt response to this request is most appreciated.

Sincerely,



Cathy S. Woollums
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Chief Environmental Counsel
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