

# PacifiCorp - Stakeholder Feedback Form

## 2015 Integrated Resource Plan

PacifiCorp (the Company) requests that stakeholders provide feedback to the Company upon the conclusion of each public input meeting and/or stakeholder conference calls, as scheduled. PacifiCorp values the input of its active and engaged stakeholder group, and stakeholder feedback is critical to the IRP public input process. PacifiCorp requests that stakeholders provide comments using this form, which will allow the Company to more easily review and summarize comments by topic and to readily identify specific recommendations, if any, being provided. Information collected will be used to better inform issues included in the 2015 IRP, including, but not limited to the process, assumptions, and analysis. In providing your feedback, PacifiCorp requests that the stakeholders identify whether they are okay with the Company posting their comments on the IRP website.

Yes  No May we post these comments to the IRP webpage? Date of Submittal 8/28/2014

\*Name: Scott Allegrucci Title: Click here to enter text.

\*E-mail: scott@westerncec.org Phone: 785-764-1992

\*Organization: Western Clean Energy Campaign, on behalf of  
PacifiCorp IRP "Clean Energy Scenario  
Stakeholders"

Address: Click here to enter text.

City: Click here to enter text. State: Click here to enter text. Zip: Click here to enter text.

Public Meeting Date comments address: August 7 & 8, 2014  Check here if not related to specific meeting

List additional organization attendees at cited meeting: Click here to enter text.

**\*IRP Topic(s) and/or Agenda Items:** List the specific topics that are being addressed in your comments.  
2015 IRP Development of Regional Haze Scenarios

Check here if any of the following information being submitted is copyrighted or confidential.

**\*Respondent Comment:** Please provide your feedback for each IRP topic listed above.

The form provided would not let me mark the appropriate box above while editing in the template document, but I hereby confirm that yes, Pacificorp may post these comments on the IRP website.

Regarding the development of Pacificorp's Regional Haze Scenarios as part of the 2015 IRP process and as presented in the August 7 & 8, 2014 PowerPoint Presentation, BART controls must be installed no later than 5 years after the date of EPA's final BART rule for Utah. [42 U.S.C. §7491(g)(4)]. At the August 7 & 8, 2014 public information session, Pacificorp claimed that EPA would not finalize its Regional Haze BART rule for Utah until 2016 at the earliest. As a result, Pacificorp did not include any BART upgrades at Hunter Units 1 & 2 and Huntington Units 1 & 2 until December 2021 and 2022. [See, August 7 & 8, 2014 Pacificorp Powerpoint Presentation, page 63]. For the reasons stated by the public at the August 7, 2014 public information session and as further explained below, Pacificorp's assumption about the timing of EPA's finalization of its Utah BART rule runs contrary to EPA's statutory mandate to finalize its regional haze rule on a date between October 30, 2014-January 14, 2015 resulting in installation of BART controls on all four units in October 2019-January 2020 rather than in 2021/2022. The undersigned request that Pacificorp amend its regional haze modeling scenarios to comport with EPA's statutory obligation.

On October 30, 2012 EPA signed its Final Rule disapproving of the State of Utah's BART determination for Hunter Units 1 & 2 and Huntington Units 1 & 2. EPA published this Final Rule in the Federal Register on December 14, 2012. [See, 77 Fed. Reg. 74355]. The Final Rule became effective on January 14, 2013. Under Section 7410(c)(1) of the Clean Air Act, 42 U.S.C. §7410(c)(1), EPA must promulgate a FIP addressing Utah's deficiency within 2 years of its disapproval. To date, the State of Utah has not presented to EPA or the public a SIP amendment addressing EPA's final disapproval of the BART determinations for the Hunter and Huntington plant. Thus, it does not appear that Utah will take action in a timeframe that would allow EPA to avoid issuance of a FIP. Additionally, Pacificorp has not produced any evidence to support its claim that EPA will not finalize its Utah BART FIP until 2016 or later. As such, Pacificorp's regional haze modeling scenarios must assume that EPA will comply with its statutory obligation and

\* Required fields

finalize its FIP obligation within 2 years, or as early as October 30, 2014 and no later than January 14, 2015. As a result, Pacificorp's modeling should assume that BART controls on these units must be installed at the end of 2019 or in January 2020.

Submitted by:

Christopher Thomas, HEAL Utah

Shannon Anderson, Powder River Basin Resource Council

Stephanie Kodish, National Parks Conservation Association

Gloria Smith, Sierra Club

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**Data Support:** If applicable, provide any documents, hyper-links, etc. in support of comments. (i.e. gas forecast is too high - this forecast from EIA is more appropriate). If electronic attachments are provided with your comments, please list those attachment names here.

Specific statutory and regulatory references confirming the EPA deadline in question are cited in the text above.

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**Recommendations:** Provide any additional recommendations if not included above - specificity is greatly appreciated.

[Click here to enter text.](#)

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Thank you for participating.

\* Required fields