

To: Utah Public Service Commission

From: Protect Our Winters, POWDR Resorts, Snowbird, and the signatories below

RE: Docket Number 17-035-40

Date: June 25, 2018

I. INTRODUCTION

a. SIGNATORIES

**Protect Our Winters** is a national 501(c)(3) nonprofit that turns passionate outdoor people into effective climate advocates. We lead a community of professional athletes, thought pioneers, and forward-thinking business leaders to affect systemic political solutions to climate change.

**COMPANIES**

The following snowsports and outdoor companies have signed on in support of these written comments:

*Jason Cole, Co-Owner, **Cole Sport**, Park City*

*Calvin Egbert, Co-Owner, **Milosport**, Salt Lake City*

*Laura Schaffer, Sustainability Director, **POWDR Resorts**, Park City*

*Carlo Salmini, Co-Founder & CEO, **Shred Optics**, Park City*

*Bryn Carey, CEO & Founder, **Ski Butlers**, Park City*

*Ed Lewis, CEO & Founder, **Snocru**, Park City*

*Dave Fields, General Manager, **Snowbird**, Little Cottonwood Canyon*

*Bryon Friedman, Founder, **Soul Poles** and Professional Skier, Park City*

**ATHLETES**

The following professional snowsports athletes have signed on in support of the following written comments:

*Julian Carr, Professional Skier, Salt Lake City*

*Alex Deibold, Olympic Snowboarder, Salt Lake City*

*Amie Engerbretson, Professional Skier, Salt Lake City*

*Caroline Gleich, Professional Ski Mountaineer, Salt Lake City*

*Brody Leven, Professional Ski Mountaineer, Salt Lake City*

*Steven Nyman, Olympic Skier, Park City*

*Sierra Quitiquit, Professional Skier, Salt Lake City*

*Forrest Shearer, Professional Snowboarder, Salt Lake City*

*Griffin Siebert, Professional Snowboarder, Salt Lake City*

*Zeppelin Zeerip, Professional Snowboarder, Salt Lake City*

b. INTEREST IN DOCKET 17-035-40

The entities submitting this written comment have common concerns regarding this docket. First, we believe that increasing clean electricity in Utah and across the West ensures stable and affordable energy for businesses and customers. Second, we consider climate change to be a grave threat to our businesses and the Utah outdoor recreation economy which generates \$12.3 billion in consumer spending annually and supplies 110,000 direct jobs,<sup>1</sup> and we believe leadership at the state level can lead to regional and national adoption of similar policies that will ultimately result in lowering greenhouse gas emissions nationwide. Third, more and more, consumers are increasingly demanding clean energy for themselves and the businesses they patronize. We require increased opportunities to power our businesses on clean energy to remain competitive in today's consumer world, and we ultimately rely on the Utah Public Service Commission's decision to meet consumer demand.

c. SUMMARY OF RECOMMENDATIONS

For the reasons stated above, we recommend that the Utah Services Commission accepts PacifiCorp's proposal to increase its renewable energy supply.

II. IMPACTS OF CLIMATE CHANGE

a. WHY CLIMATE CHANGE IS RELEVANT TO THE DOCKET

The impacts of climate change are of great concern to the signatories. Warming winters threaten Utah's outdoor recreation economy and more so, Utah's snowsports industry. Every year, the snowsports industry generates \$72 billion dollars and supports 695,000 jobs nationwide.<sup>2</sup> In fact, spending on snowsports actually supports more jobs than the extractive industries in our country. Unfortunately, climate change is threatening the future of this economic engine. Today, snowpack is confined to the highest elevations, and our seasons are noticeably shorter. What should be falling as snow is in fact falling as rain.

In the past, Thanksgiving has been a crucial revenue week for the ski industry, and now, resorts are fortunate if they can open by that date.

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<sup>1</sup> Outdoor Industry Association: 2017 Utah Outdoor Recreation Economy Report. Accessed: <https://outdoorindustry.org/resource/utah-outdoor-recreation-economy-report/>

<sup>2</sup> *Id.*

Now, Christmas week, again a crucial revenue-generator, is variable. In addition, a large part of the snowsports economy is wrapped up in competitions, from the X Games to the Olympics. If we want a prosperous future of snowsports events in the US, we need to remember that venues are nothing without snow. More and more early season events have been cancelled; events that draw tens of thousands of spectators who pump up to \$6 million dollars in early-season revenue into the local economy over a weekend.

The most recent research on the impacts of climate change on the snowsports industry in the US finds that “virtually all locations are projected to see reductions in winter recreation season lengths, exceeding 50% by 2050 and 80% in 2090 for some downhill skiing locations.”<sup>3</sup>

Multiple independent measurements indicate that the climate in the Intermountain West of the United States is changing, warming the region approximately 2°F in the last thirty years.<sup>4</sup> In addition to snowpack loss, the US Environmental Protection Agency notes that Utah’s warming climate will impact water availability, agriculture, wildfires and changing landscapes, pests (and forest health), and human health.<sup>5</sup>

A February 2018 report by Protect Our Winters<sup>6</sup> showed that nationwide, in low snowfall years, the snowsports industry stands to lose over \$1 billion in revenue and 17,400 jobs. We cannot afford this risk in a state with a strong snowsports industry.

To ensure a prosperous future for outdoor and snowsports businesses and a thriving outdoor recreation economy, which is crucial to both Utah’s brand and tax revenue, climate change must be addressed. Fortunately, PacifiCorp’s proposal offers the state an opportunity to transition to more

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<sup>3</sup> Projected climate change impacts on skiing and snowmobiling: A case study of the United States, Wobus et. al. July 2017. Accessed: <https://www.sciencedirect.com/science/article/pii/S0959378016305556>

<sup>4</sup> Western Water Assessment: Climate Change and Projections. NOAA. Accessed: <http://wwa.colorado.edu/climate/change.html>

<sup>5</sup> US EPA: What Climate Change Means For Utah. Accessed: <https://19january2017snapshot.epa.gov/sites/production/files/2016-09/documents/climate-change-ut.pdf>

<sup>6</sup> The economic contributions of winters sports in a changing climate. Hagenstad & Burakowski et. al. February 2018. Accessed: <https://protectourwinters.org/2018-economic-report/>

renewable sources of energy and begin rapid reductions of climate-driving greenhouse gas emissions.

b. WHY CLIMATE SHOULD BE A DRIVING FACTOR IN THE DECISION

It is true that accepting PacifiCorp's proposal within the state of Utah cannot mitigate all climate-driving greenhouse gas emissions. However, in the absence of federal action on climate, states are the leading actors when it comes to mitigation. By adopting the proposed portfolio and integrating high levels of renewable energy into Utah's grid, we have the opportunity to show leadership to the US and other countries.

In addition, in March 2018, the Utah Legislature passed the House Concurrent Resolution 7 in Salt Lake, later signed by Governor Gary Herbert, committing the state to "prioritize our understanding and use of sound science to address causes of a changing climate and support innovation and environmental stewardship in order to realize positive solutions,"<sup>7</sup> calling on the governor to direct agencies and businesses to reduce harmful greenhouse gas emissions.

c. RELATIONSHIP BETWEEN CLIMATE CHANGE AND POWER COSTS FOR THE OUTDOOR INDUSTRY AND SKI RESORT OPERATORS

The snowsports industry contributes \$2.3 billion in revenue and provides over 23,000 jobs in Utah.<sup>8</sup> It is not an industry the state can afford to hinder in the face of climate change. Beyond the resorts themselves, Utah's mountain communities whose hotels, restaurants, equipment rental companies, gas stations, local shops— even schools and governments— all depend on the ski industry or its tax revenue. We cannot afford to put these businesses at risk.

It is true, a short-term fix is to expand the industry's reliance on artificial snowmaking to ensure a timely opening and consistency throughout the season. But, that challenge is twofold: first, increased snowmaking is prohibitively expensive, often out of the question for small resorts. Second, if we use carbon intensive electricity to make more snow, we only contribute to more warming.

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<sup>7</sup> Concurrent Resolution on Environmental and Economic Stewardship: 2018 General Session, State of Utah. Accessed at: <https://le.utah.gov/~2018/bills/static/HCR007.html>

<sup>8</sup> Outdoor Industry Association: 2017 Utah Outdoor Recreation Economy Report. Accessed: <https://outdoorindustry.org/resource/utah-outdoor-recreation-economy-report/>

d. BENEFITS TO THE UTAH SKI INDUSTRY

The snowsports industry is energy intensive. Total electricity, fuel, and natural gas costs to operate lifts, snowmaking, facilities, and vehicles can add up to 5% of a resort's operating revenue. Every dollar spent is a dollar not spent on raises, capital improvements, or guest services. Keeping electricity costs stable and low– which would be achieved through expanding renewable energy options in the state would be immensely helpful in keeping this low-margin industry afloat.

To further the discussion re: lower energy rates, Xcel Energy in Colorado has recently put a proposal in front of the Colorado Public Utilities Commission to increase its renewable energy portfolio to 55% renewable in the state. In this process, Xcel asked power providers to bid on new renewable energy projects to present accurate energy costs. The returning bids showed that it would be less expensive for Xcel Energy to build new renewable energy power plants (wind and solar)– with the added capacity for energy storage– than running existing coal-fired power plants.<sup>9</sup>

An additional, ancillary benefit of PacifiCorp's proposal to increase windpower to the snowmaking business, which requires abundant water: the US Department of Energy has reported that increased wind development at the national level could also reduce the impacts of drought by helping to save over 6.5 billion gallons of water every year by 2030.<sup>10</sup>

e. WHY ACTION ON CLIMATE CHANGE IS IMPORTANT TO THE OUTDOOR INDUSTRY

The ski industry is only the most obvious victim of a warming climate. But the outdoor industry– which nationally creates 7.6 million jobs and generates \$887 billion in economic revenue, and which Protect Our Winters represents– is equally threatened. Each sector has its own unique problems. Without a healthy snowpack, rivers and streams are

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<sup>9</sup> Xcel Energy receives shockingly low bids for Colorado electricity from renewable sources: solar and wind generation with storage now competitive with coal power. February 2018. Accessed: <https://www.denverpost.com/2018/01/16/xcel-energy-low-bids-for-colorado-electricity/>

<sup>10</sup> Wind vision: New report highlights a robust wind energy future. March 2015. Accessed: <https://www.energy.gov/articles/wind-vision-new-report-highlights-robust-wind-energy-future>

increasingly too hot to fish, nor do they have enough water for navigation, leaving both the boating and fishing industry struggling. Climbers, runners, and mountain bikers are faced with temperature challenges, and days where it is simply too hot to get outdoors. Hunters see changes in animal migrations and populations, which struggle in a warming world. Outdoor businesses, whether a manufacturer selling cold-weather clothing or a retail shop selling fishing rods and flies, are impacted by climate change. It is for these reasons that iconic brands like Orvis, The North Face, Patagonia, and REI are increasingly advocating for action on climate.<sup>11</sup>

### III. RECOMMENDATION

For these reasons, Protect Our Winters and the undersigned strongly urge the Utah Public Service Commission accept PacifiCorp's proposal as referenced in Docket Number 17-035-40 to increase its renewable energy portfolio in the state of Utah and across the Western United States. We thank the Utah Public Service Commission in advance for its time and consideration.

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<sup>11</sup> CEOs of Aspen Skiing Company and The North Face: "Climate change threatens our livelihoods— and yours" November 2009. Accessed: <https://thinkprogress.org/ceos-of-aspen-skiing-company-and-the-north-face-climate-change-threatens-our-livelihoods-and-yours-63bd3f6f43d2/>