



PublicService Commission <psc@utah.gov>

Public Comment on Docket No. 21-035-09

1 message

Amanda Fulton (apfulton@gmail.com) Sent You a Personal Message

Mon, Mar 7, 2022 at 9:04 PM

<kwautomail@phone2action.com>

Reply-To: Amanda Fulton <apfulton@gmail.com>

To: psc@utah.gov

Dear Utah Public Service Commission,

Dear Commissioners,

I am writing to urge you to not accept the Rocky Mountain Power 2021 Integrated Resource Plan for filing. The current 20-year plan and 5-year Action Plan represent a huge risk for Utah's future and do not reflect my values as a Utah resident. I am deeply concerned that the current IRP ignores critical information and employs wishful thinking on behalf of untested technologies to build an unrealistic energy mix, without any viable contingency plan. Rocky Mountain Power's failure to consider climate change impacts, the continued decline of coal economics, and Clean Air Act compliance requirements for their thermal plants, does not mean those realities do not exist, but rather, that Utah communities will have to face the consequences of inaction unprepared and unsupported by their public utility. We deserve a utility plan that ensures least cost and least risk energy supply that is based in reality, not false solutions.

The Natrium nuclear plant, targeted to be online relatively soon by 2028, is shockingly unsupported in the IRP with no contract or permitting details and no reasonable accounting of costs and risks. Worse yet, Rocky Mountain Power has forced the nuclear project into almost every single planning scenario. What happens when the project runs into inevitable delays and procedural hurdles? What alternative resources would need to be built to replace that capacity in the near term? We do not know, because Rocky Mountain Power has not included that very foreseeable reality into planning assumptions.

Utah's own Electric IRP Guidelines state that an IRP should include a demonstration and analysis as to whether the resources studied are the least-cost/least risk, the modeling assumptions, sensitivity analyses, the types of resources considered and a demonstration that the assumptions used in the study are reasonable. By this standard alone, the Utah Commission should not accept the Rocky Mountain Power IRP for filing. The utility has repeatedly failed to plan for existing and projected Clean Air Act compliance obligations on coal plants. The utility manufactured a recent crisis because of this lack of planning, which required an emergency proclamation from Wyoming Governor Gordon to keep Jim Bridger unit 2 operating in violation of federal law. Now, coal communities and customers must contend with severe uncertainty because Rocky Mountain Power acted irresponsibly by refusing to plan for the foreseeable eventuality of federal air regulations.

Utah needs a plan that prepares us to address the very real challenges facing our state. We need a plan that takes our carbon-constrained economy into account, and accurately represents transition timelines to coal workers and communities. We need a plan that includes consideration of the causes, impacts, and risks of climate change, and prepares Utah for a more resilient future. We need a plan that invests in the untapped potential of energy efficiency, renewable energy, and tested storage technology. Rocky Mountain Power's 2021 IRP fails to reasonably address all of these concerns, and should be rejected.

Thank you for your consideration.

Sincerely,

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This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. If you need more information, please contact Lillian Miller at Sierra Club at core.help@sierraclub.org or (415) 977-5500.