



PublicService Commission &lt;psc@utah.gov&gt;

---

**UCARE Amended Request for Agency Action, re: Docket 22-035-35**

1 message

---

**stholmes3@xmission.com** <stholmes3@xmission.com>

Mon, Jul 18, 2022 at 4:24 PM

To: Public Service Commission &lt;psc@utah.gov&gt;

Cc: UCARE@xmission.com

Docket 22-035-35 ... UCARE Amended Request for Agency Action to Reform IRP Guidelines

Dear Commissioners,

As permitted by the Commission's administrative code, under R746-1-205, UCARE respectfully submits this Amended Request for Agency Action for the purpose of narrowing the scope of Integrated Resource Planning (IRP) Guidelines review and reform from that in which we initially expressed interest in our Request for Agency Action filing of June 29, 2022.

UCARE acknowledges that prior to, and during, the July 11, 2022 scheduling conference for Docket 22-035-35, several parties expressed reluctance to undertake a broad review of the IRP guidelines. Having given their concerns further consideration, we concede that a wide-ranging analysis of multiple IRP Guidelines items and associated issues could be exceedingly time and labor consumptive and could actually detract from UCARE's primary focus on Guideline 4(k) and the consequential inclusion of externalities as factors in resource planning.

We suspect that significant resources may be required to thoroughly examine and evaluate IRP Guideline 4(k), which is UCARE's main goal in proceedings of Docket 22-035-35. We plan to focus our efforts on a comprehensive examination of environmental and societal externalities and to make a convincing case for strengthening Guideline 4(k) to more appropriately integrate externality factors into the Commission's future regulation of PacifiCorp's IRP processes.

To that end, UCARE looks forward to opportunities within the docket to:

- ~ identify and describe the full range of externalities associated with PacifiCorp's electricity generation in Utah;
- ~ present sets of data from multiple sources for the quantification of these externalities;
- ~ explain how IRP Guideline 4(k), developed in 1992, is not well-suited to current economic, environmental, and societal conditions or to the data bases and models now available;
- ~ discuss new applications of externality factors to the IRP process that comport with the Commission's mission and regulatory objectives; and,
- ~ propose a revision of Guideline 4(k) that better reflects the importance of incorporating externalities into the IRP process and includes a methodology for doing so.

We hope that the Commission and all interested parties will agree to at least one technical conference focusing on externalities.

To summarize this Amended Request for Agency Action, it is UCARE's desire and intent to focus exclusively on IRP Guideline 4(k) in the context of Docket 22-035-35 and to forgo the pursuit of other Guideline items that were mentioned in our Request for Agency Action of June 29, 2022.

Your acknowledgement of this amendment to our initial filing would be greatly appreciated.

Sincerely,

/s/ Stanley Holmes

7/18/22, 4:49 PM

State of Utah Mail - UCARE Amended Request for Agency Action, re: Docket 22-035-35

Outreach Coordinator,  
UCARE  
<[stholmes3@xmission.com](mailto:stholmes3@xmission.com)>