



PublicService Commission <psc@utah.gov>

Comment, Docket 22-035-35

1 message

Curtis Judd <curtis.judd@gmail.com>

Tue, Aug 9, 2022 at 11:29 PM

To: psc@utah.gov

Dear Public Service Commission,

I urge you to update the Integrated Resource Plan as follows:

- All environmental and societal externality costs are specifically identified and assessed by a neutral third party, not PacifiCorp;
- All IRP resource models and portfolios acknowledge the full range of monetized externality costs; and,
- Every biennial IRP process will include a technical review of the latest externalities research.

As the PSC, it is your duty to ensure that the public services truly serve the public and account for the costs they externalize in an honest fashion. That these externalities have been defined by the public services has led to a situation where the public services get to avoid accounting for costs that are born by the public. It is time for us to be more honest with ourselves and find constructive ways to address this.

Thanks and regards,
Curtis Judd
Wanship, UT 84017



PublicService Commission <psc@utah.gov>

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1 message

Hickert, Alyssa S <AlyssaHickert@creighton.edu>
To: "psc@utah.gov" <psc@utah.gov>

Wed, Aug 10, 2022 at 11:23 AM

To Whom It May Concern,

Thank you for taking public comments on the current IRP process. I am a resident of North Salt Lake in Utah and my primary concern as a customer of Rocky Mountain Power, is that my utility company is not sufficiently motivated to appreciate its environmental effects and minimize its contributions to climate change.

I am concerned that PacifiCorp's inertia regarding environmental impact is driven by the current IRP guidelines re: externalities.

I would like to see the following changes:

1. All environmental and societal externality costs are specifically identified and assessed by a neutral third party, not PacifiCorp.
2. All IRP resource models and portfolios acknowledge the full range of monetized externality costs.
3. Every biennial IRP process will include a technical review of the latest externalities research.

Thank you for your time and efforts,
Alyssa Hickert, M.D.



PublicService Commission <psc@utah.gov>

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1 message

John Anderson <john@appmagic.com>
To: psc@utah.gov

Wed, Aug 10, 2022 at 1:25 PM

It's long overdue that we consider the consequences of climate change before it's too late since we have only one planet.

The PSC needs to update its IRP guidelines so that:

All environmental and societal externality costs are specifically identified and assessed by a neutral third party, not PacifiCorp;

All IRP resource models and portfolios acknowledge the full range of monetized externality costs; and, every biennial IRP process will include a technical review of the latest externalities research.



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1 message

Ken Jameson <kpjameson@gmail.com>
To: psc@utah.gov

Wed, Aug 10, 2022 at 1:52 PM

I was born in Utah and returned here to live in 1989, around the time the 1992 IRP Guidelines were put into effect. When I just read the extant IRP Guidelines, I got the sense of living in a time warp. In 1992, the Great Salt Lake was near its record high water volume; Lake Powell was full and would continue that way until 1999; and I recall clear vistas from our first trips up Boulder Mountain or on Highway 72 by Fremont, looking down into the Cathedral Valley.

Today, the Salt Lake is not great and is at record lows; Lake Powell is around 30% filled; and the vistas are haze filled virtually all the time. Yet, the guidelines continue to allow PacifiCorp to continue to pay lip service to accounting for the effect of its emissions on the environment we all live in. A reading of the discussion around Guideline 4k calls to mind Shakespeare's *Hamlet*, "To be or Not to Be," to confront or not to confront.

I believe that the answer is clear. The Guidelines have to be changed radically to address the current state of our knowledge, our environment, and our planning processes. In 1992, perhaps the ability to put values on environmental externalities was still evolving. By now, with thirty years of experience and the development of carbon offset markets, putting a narrow range of values on externalities is both feasible and desirable. PacifiCorp should be required to carry out this calculation in its resource planning. This should be done by an independent entity, agreed upon by the company and by the intervenors.

This step is made urgent by the environmental indicators noted above. Utah is suffering "The tragedy of the commons," where our common resources, our air and our water, are being detrimentally affected by entities, such as the company, who are not required to take into account their externalities. And the IRP Guidelines allow Utah to play the role of a "third world dumping ground" since most surrounding states have been much more demanding of PacifiCorp and their other utilities to take into account environmental impacts.

Finally, the company has the ability to undertake a meaningful IRP process, which it has clearly not done in the case of Utah. It has been called on this inadequacy in Washington. One part of this should be specific consideration of the process of accounting for externalities and every IRP should update this to take into account the most recent advances.

This is 2022, not 1992, and we have to live in the present and confront the realities of the day. This requires a clear decision to change the IRP Guidelines for PacifiCorp so that it uses the most up-to-date methods to take into account its environmental externalities. Of course PacifiCorp can't singlehandedly solve the water and air problems we face. But it can become part of the solution rather than only part of the problem.

--
Ken



PublicService Commission <psc@utah.gov>

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1 message

Earl Lewis <earl.lewis.1@gmail.com>

Wed, Aug 10, 2022 at 4:51 PM

To: psc@utah.gov

The Utah Public Service Commissions guidelines for IRPs are antiquated and need to be updated.

The PSC needs to update its IRP guidelines so that:

- ~ all environmental and societal externality costs are specifically identified and assessed by a neutral third party, not PacifiCorp;
- ~ all IRP resource models and portfolios acknowledge the full range of monetized externality costs; and,
- ~ every biennial IRP process will include a technical review of the latest externalities research.

Please make sure that our state's power producers are held accountable for their contributions to climate change and our state's air quality.

Sincerely,

Earl Lewis
801-554-3596