



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

## Public Comment to 2023 IRP Docket 23-035-10

1 message

**Monica Hilding** <mohilding@gmail.com>  
To: psc@utah.gov

Thu, Mar 9, 2023 at 4:50 PM

Dear Commissioners,

The Utah Environmental Caucus for the state of Utah is dedicated to being protective stewards of our ecologically rich and diverse lands which are under constant threat from numerous organizations. We strive to keep environmental concerns at the forefront of political debate, supporting candidates and holding monthly meetings meant to educate voters.

We understand that Rocky Mountain Power has requested an extension of its 2023 IRP submission deadline in order to consider impacts of changes to the Ozone Transport Rule, the Inflation Reduction Act, resource interconnection rules, the Oregon Clean Energy Plan, and Washington's Clean Energy Transformation Act. Our Caucus supports your granting this extension provided that Rocky Mountain Power agrees to address additional issues that are of concern to us and that may impact electric utility resource decision-making with consequences for our constituency.

The Utah Environmental Caucus (UEC) is aware that Rocky Mountain Power (RMP) continues to stifle expansion of distributed clean energy resources, especially rooftop solar, even as coal and methane (aka. natural gas) dominates its energy mix in Utah. RMP ended net-metering and halved the export credit rate for new rooftop solar customers. However, net-metering may make a comeback in Utah if legislative initiatives such as the recent state Senate Bill 211 are able to advance.

See SB 211 "Net Metering Amendments", at: [le.utah.gov/~2023/bills/static/SB0211.html](https://leg.utah.gov/~2023/bills/static/SB0211.html)

If granted the requested extension, and before filing the 2023 IRP, RMP should explain to stakeholders how reestablishing net-metering for new rooftop solar customers in Utah could affect energy generation, transmission, and storage resource decisions over the biennial 2023 IRP timeframe and the 20-year horizon.

In addition to SB.211, the recently concluded Utah Legislature general session featured House Joint Resolution 11 (HJR.11), whose purpose was, "Establishing A State Social Cost of Carbon." Like SB.211, HJR.11 failed to pass its first round, but may be considered during the upcoming Interim Session and is expected to reappear during the next general legislative session.

See HJR.11 at: [le.utah.gov/~2023/bills/static/HJR011.html](https://leg.utah.gov/~2023/bills/static/HJR011.html)

The UEC is also aware that the Environmental Protection Agency may increase its social cost of carbon (SCC) estimates to a range of \$120-to-\$340 per metric ton of CO2, which is considerably higher than the \$74-to-\$150 SCC rise that PacifiCorp (dba. Rocky Mountain Power) projected out to 2040 in its 2021 IRP.

If granted the requested extension, and before filing the 2023 IRP, RMP should explain to stakeholders how changing state and national SCC calculations could affect energy generation, transmission, and storage resource decisions over the biennial 2023 IRP timeframe and the 20-year horizon.

The UEC requests that RMP explain to stakeholders how other energy-related bills passed by the 2023 Utah Legislature could impact 2023 IRP planning generally and state-specific resource decisions made in Utah.

For example, House Bill 425 (HB.425), "Energy Security Amendments", draws a state agency, a legislative committee, and the state attorney general's office into deliberations over the "decommissioning of a coal-powered electrical generation facility."

See HB.425 at: [le.utah.gov/~2023/bills/static/HB0425.html](https://leg.utah.gov/~2023/bills/static/HB0425.html)

Would contrary IRP provisions supersede the will of state officials? And might PacifiCorp's system-wide grid integration be compromised by HB.425's mandate for the promotion of Utah's "energy independence"? We know that PacifiCorp's planning is influenced by directives from the Washington legislature. How will decisions of Utah legislative and executive bodies affect the 2023 IRP?

To reiterate, the Utah Environmental Caucus supports your granting the requested IRP submission extension provided that Rocky Mountain Power agrees to address additional issues that are of concern to us and that may impact electric utility resource decision-making with consequences for our constituency.

Sincerely,

Monica Hilding  
Chair, Utah Environmental Caucus