



IRP Public Comment, Docket #23-035-10

1 message

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Dear Utah Public Service Commissioners,

Thank you for this opportunity to comment on docket #23-035-10, the 2023 PacifiCorp Integrated Resource Plan (IRP), on behalf of No Coal In Oakland.

We in Oakland, California, like the residents of all six PacifiCorp states, are impacted by utility regulatory decisions in each PacifiCorp state, including Utah.

An orderly but rapid transition off of fossil fuels is now clearly necessary to avoid catastrophic climate change scenarios. Already Californians and Utahns alike experience climate change impacts including:

- more heat-related illnesses, health care costs, and deaths
- more frequent, severe, and long-lived droughts
- precipitation shifting from snow to rain and snow-packs melting earlier, resulting in increased flood damage and precarious water supplies
- decreased agricultural productivity
- more frequent and severe wildfires
- the death of large proportions of trees in our forests. Here, a massive on-going tree die-off in parkland bordering East Oakland poses a public safety emergency due to fire risk.^[1]

Californians face skyrocketing homeowner insurance rates, outright cancellation of long-standing policies, and difficulty finding insurance altogether due to climate-related increases in catastrophic wildfires.

Berkshire Hathaway's own AmGUARD is among the insurance companies abandoning the state.^[2] Owners of valuable residential properties in northern Utah may face similar challenges soon.^[3]

Public health impacts also mandate the urgent transition off of fossil fuels. Power plant emissions are responsible for a heavy burden of acute and chronic diseases and deaths. Some impacts, like asthma attacks, heart attacks, and strokes, result from just hours to days of exposure to increased levels of fine particulate matter.^[4] This means that the health benefits to Utahns will begin immediately with the closure of dirty facilities like Rocky Mountain Power's Hunter and Huntington plants.

Thus, we applaud PacifiCorp's 2023 IRP's promise of "reducing greenhouse gas emissions and transitioning to cleaner energy sources." However, we believe the Plan's transition targets fall short, and the recent All Source RFP suspension makes those targets unachievable.

We challenge PacifiCorp's use of wildfire liability expenses and rising insurance rates as an excuse to stall its procurement of clean energy resources by suspending the 2022 All Source RFP. It now costs less to build and operate new renewable sources than to continue operating existing coal-powered plants.^[5]

To the extent that its energy resource portfolio skews toward coal and methane combustion, PacifiCorp exacerbates conditions conducive to catastrophic wildfires and in turn increases its wildfire liability risk and insurance rates. The IRP must thus be evaluated together with insurance expenses and wildfire liability expenses. We urge the PSC to combine the dockets for Oregon wildfire liability (docket #23-035-30), rising insurance costs due to climate change impacts (docket #23-035-40), and the 2023 IRP.

In summary, we request that the PSC:

- require a more aggressive transition to power sourced from renewable sources that emit no greenhouse gasses or toxic particulate matter and ozone
- deny approval unless PacifiCorp re-releases and pursues its All Source RFP and
- combine dockets #23-035-30 and #23-035-40 with this one.

Sincerely,

Ann Harvey, MD for No Coal In Oakland

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[1] [“Meet the ‘carbonator,’ a machine helping reduce fire hazards in Anthony Chabot Regional Park”](#) The Oaklandside, Oct. 27, 2023

[2] [“2 more carriers stop insuring California homeowners”](#) NORTH BAY BUSINESS JOURNAL August 22, 2023

[3] [“How climate change puts property values at risk in forested areas”](#) The University of Utah Research, August 17, 2023

[4] [Recent Insights into Particulate Matter \(PM_{2.5}\)-Mediated Toxicity in Humans: An Overview](#). International Journal of Environmental Research and Public Health. 2022 Jun; 19(12): 7511. See Table 2 for a succinct list of health complications due to short and long-term exposure to fine particulate matter (PM_{2.5}).

[5] ["99% Of U.S. Coal Plants Are More Expensive Than New Renewables. A Coal-To-Clean Transition Is Worth \\$589 Billion, Mostly In Red States"](#) Forbes, January 30, 2023