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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF PACIFICORP'S
2023 INTEGRATED RESOURCE PLAN

Docket No. 23-035-10

REPLY COMMENTS OF WESTERN RESOURCE ADVOCATES

January 31, 2024

Western Resource Advocates (“WRA”) appreciates the opportunity to provide reply comments to the Public Service Commission of Utah (“PSC” or “Commission”) pursuant to the June 27, 2023, Scheduling Order and Notice of Technical Conference regarding PacifiCorp’s 2023 Integrated Resource Plan (“IRP”).

I. Introduction.

Six parties in addition to WRA submitted initial comments on December 12, 2023. In these reply comments, WRA responds to the initial comments filed by the Division of Public Utilities (“DPU” or “Division”), the Office of Consumer Services (“Office”), and the Utah Association of Energy Users (“UAE”). Specifically, the comments of these parties underscore different elements of PacifiCorp’s noncompliance with Guideline 3 of the 1992 Report and Order on Standards and Guidelines (“Guidelines”) that requires “ample opportunity for public

input and information exchange.”¹ Their comments reflect a similar dissatisfaction with the current IRP process, accentuating the need for a material change in procedure as WRA suggested in our initial comments, and supporting our view that the Commission treat the 2023 IRP and its Update as a complete filing. In addition, we respond to the Division’s contention that a ten-year life for natural gas resources violates Guideline 4(b)(iii) requiring resource assessments to include “life expectancy of the resources,”² and we address the Division’s assertion that renewable resources and battery storage were treated “optimistically.”

II. Comments of Other Parties Support Modifying Utah’s Acknowledgment Process to Include the IRP Update for this IRP as well as for Future IRPs.

WRA’s initial comments in this IRP differed substantially from the types of comments we have submitted to the Commission in previous IRP cycles. In many of these past comments, we provided the Commission with our view of whether the Company had complied with the requirements outlined in the Guidelines.³ In this IRP, we did not take a stand on acknowledgement. Instead, we provided evidence for our view that the biennial IRP process, as currently conducted, does not allow sufficient time to develop a timely and accurate IRP while providing sufficient opportunity for a robust *and collaborative* public input process. We view this as a structural issue. We proposed a potential change in Utah’s process as a solution to the

¹ Guideline 3 states: “The IRP will be developed in consultation with the Commission, its staff, the Division of Public Utilities, the [Office] of Consumer Services, appropriate Utah state agencies and interested parties. PacifiCorp will provide ample opportunity for public input and information exchange during the development of its Plan.” *In the Matter of Analysis of an Integrated Resource Plan for PacifiCorp*, Docket No. 90-2035-01, Report and Order on Standards and Guidelines (issued June 18, 1992), at 41-42 [hereinafter Guidelines].

² *Id.* at 37.

³ We deviated from that pattern in our comments on the 2021 IRP. In that set of comments, our purpose was to inform the Commission of the evidence provided by the IRP regarding the uneconomic operation of PacifiCorp’s remaining coal fleet. We provided the Commission with a preview of likely issues that would be raised in any Reassignment application that might be filed as contemplated by the 2020 cost allocation protocol.

ongoing structural tension between timeliness, accuracy, and an open, collaborative, and transparent public input process.

Significantly, we recommended that the Commission treat the 2023 IRP and its Update as a complete filing and issue an Acknowledgement Order on the 2023 IRP only after receiving and reviewing comments on the Update (scheduled to be filed March 31, 2024). This would be a test case for the changed process we suggested as a potential solution to ongoing time delays and lack of opportunity for meaningful input. The positions taken by the DPU, the Office, and UAE support our view that the public input process requires redress. And the Office's comments support our view that an Acknowledgment Order should include the 2023 IRP Update.

All three parties referenced non-compliance with Guideline 3 as a reason for recommending that the Commission not acknowledge the 2023 IRP. The Division cited "chronic lateness" and explained how this harms "the amount and quality of stakeholder input."⁴ The Office cited "insufficient public input and information exchange," and explained that PacifiCorp had not provided the results of its portfolio modeling to parties and given them an opportunity to provide feedback ahead of filing its preliminary IRP on March 31.⁵ UAE argued that by not sharing modeling results ahead of the March 31 filing, PacifiCorp had "deprived stakeholders of necessary information and an opportunity to provide input" during the development of the plan.⁶ All three referenced PacifiCorp's chronic lack of compliance with Guideline 3.

⁴ *Comments of the Division of Public Utilities*, Docket No. 23-035-10 (filed December 12, 2023), at 13 [hereinafter *DPU Comments*].

⁵ *Comments of the Office of Consumer Services*, Docket No. 23-035-10 (filed December 12, 2023), at 2 [hereinafter *Office Comments*].

⁶ *Comments of the Utah Association of Energy Users*, Docket No. 23-035-10 (filed December 12, 2023), at 5-6 [hereinafter *UAE Comments*].

Parties' reactions to the suspension of the 2022 All-Source Request for Proposals ("2022 AS RFP") further support our view that changing the process would be beneficial. On September 29, 2023, PacifiCorp announced it was suspending the 2022 AS RFP. This RFP arose based on needs identified in the 2021 IRP and these resources were part of the 2023 Preferred Portfolio. As referenced by multiple parties, the suspension undermines the 2023 IRP Preferred Portfolio and its Action Plan.⁷ Stakeholders discussed the effect of suspending the RFP with PacifiCorp during the October 24, 2023, IRP Technical Conference. Stakeholders asked when modeling results would become available to evaluate how the suspension would affect the 2023 IRP. PacifiCorp responded that these results would be made available as part of the 2023 IRP Update.⁸ The Update is due to be filed April 1, 2024.

In its comments, the Office referenced the technical conference discussion and a data response that reiterated the same information. Given the effect of the suspension on the 2023 IRP Preferred Portfolio and Action Plan, the Office stated that "the 2023 IRP cannot be acknowledged until parties see the results of the modeling updates forthcoming for the 2023 IRP Update."⁹ The Office's position is consistent with our recommendation that the Commission issue an Acknowledgement Order on the 2023 IRP only after receiving and reviewing comments on the 2023 IRP Update.

⁷ *DPU Comments*, *supra* note 4, at 14-17; *Office Comments*, *supra* note 5, at 3-5; *Comments of Interwest Energy Alliance*, Docket No. 23-035-10 (filed December 12, 2023), at 7-8; *Comments of Utah Clean Energy*, Docket No. 23-035-10 (filed December 12, 2023), at 2; *Comments of the Sierra Club*, Docket No. 23-035-10 (filed December 12, 2023), at 3; and *Comments of Western Resource Advocates*, Docket No. 23-035-10 (filed December 12, 2023), at 4.

⁸ See, for example, *Office Comments*, *supra* note 5, at 5.

⁹ *Id.*

Both UAE and the Division point to key milestones within the IRP process where stakeholders strongly desire an opportunity to review results and provide input but are not given the chance. As UAE explains, “[s]takeholders first viewed portfolio modeling results when PacifiCorp filed the initial IRP on March 31, 2023, which included fully-formed conclusions about the preferred portfolio and other modeling results This process did not grant to stakeholders a meaningful opportunity to study the initial modeling results and make suggestions or otherwise collaborate on the preferred portfolio selected by PacifiCorp.”¹⁰ In a section titled “Some of the Most Consequential IRP Decisions have Little or No Stakeholder Input,” the Division discusses the selection of the Preferred Portfolio, saying:

The Division would not expect the Company to be required to adopt the top-performing variant as its preferred portfolio, regardless of the Company’s comfort level with that variant. However, there should be more stakeholder input at this step—as the process stands now, there is a lot of stakeholder input on various topics through the IRP process, but at a crucial step, the Company chooses a variant based on internal deliberations, with no reviewable methodology.¹¹

WRA agrees with both UAE and the Division that stakeholders should be given the opportunity to review results and provide input. This could happen through the six-state public input process or through a Utah-specific regulatory process. Unfortunately, it does not appear that the public input process as currently anticipated by PacifiCorp for the 2025 IRP will be sufficient to ensure compliance with Guideline 3.

On January 25, 2024, PacifiCorp held its first Public Input Meeting (“PIM”) of the 2025 IRP cycle. During that meeting, a PacifiCorp representative described the purpose of the public input process and provided a meeting calendar with rough agendas for each meeting. It appears

¹⁰ UAE Comments, *supra* note 6, at 6.

¹¹ DPU Comments, *supra* note 4, at 31.

as if the Company is proposing to undertake a repeat of the last cycle but on a schedule that will meet the March 31 deadline.¹² Included in the timeline is a proposal to file a “draft IRP” in January of 2025, take comments on the draft, and file the final IRP on April 1, 2025. However, nowhere in the proposed meeting agendas is there an item to review modeling results, provide/receive feedback, and undertake additional modeling scenarios. This is insufficient to comply with Guideline 3, which requires “ample opportunity for public input and information exchange *during the development of its Plan.*”¹³

Utah parties need a process that results in meaningful collaboration on the Preferred Portfolio. Since the six-state public input process does not appear to achieve the collaboration required by the Guidelines, the Commission should consider a Utah-specific regulatory process between the filing of the Final IRP and its Update to achieve compliance with Guideline 3. The body of information provided in the Update could be developed in collaboration with Utah stakeholders and be responsive to Utah stakeholder feedback. As we suggested in our initial comments, details of how this process might work could be developed through a working group led by the DPU.

We reiterate our recommendation that the Commission treat the 2023 IRP and its Update as a complete filing and issue an Acknowledgement Order on the 2023 IRP only after reviewing comments on the Update. We respectfully request the Commission to direct the formation of a working group led by the Division to develop the details of how this process would work.

¹² January 25, 2024 Public Input Meeting materials, slides 12-13, available at <https://www.pacificorp.com/energy/integrated-resource-plan/public-input-process.html>.

¹³ Guidelines, *supra* note 1, at 41-42 (emphasis added).

III. Ten Years Is An Appropriate Economic Life For Modeling New Natural Gas Resources.

The Division contends that PacifiCorp’s use of a 10-year life for new natural gas resources violates Guideline 4(b)(iii) that requires resource assessments to include “life expectancy.” The Division states that a 40-year life is an “appropriate” assessment of the “physical” life of the plant.¹⁴ The Division further argues that by using a “pessimistic” view of the expected life of a natural gas unit, PacifiCorp did not treat natural gas resources comparably to its “optimistic” view of other resources, including renewables, thereby violating Guideline 4(b).¹⁵ WRA disagrees; the evidence supports a ten-year “economic life” as opposed to a forty-year “engineering life.”

In the 2021 IRP cycle, PacifiCorp elected to constrain its model from selecting new natural gas resources citing significant stranded-cost risks, difficulty obtaining state siting and operating permits, and a general lack of development activity for natural gas resources.¹⁶ Thereafter, the PSC declined to acknowledge the 2021 IRP citing, among other reasons, PacifiCorp’s treatment of natural gas resources.¹⁷ In this IRP cycle, PacifiCorp allowed for the selection of new natural gas resources but limited their useful life to 10 years citing the same

¹⁴ *DPU Comments, supra* note 4, at 27.

¹⁵ *Id.* at 17.

¹⁶ *PacifiCorp 2021 Integrated Resource Plan, Volume I*, at 245.

¹⁷ The PSC determined that PacifiCorp’s treatment of new natural gas resources in the 2021 IRP failed to comply with Guidelines 4(b) and 4(i) and that PacifiCorp’s unilateral decision late in the process violated Guideline 3. Guideline 4(b) requires “an evaluation of all present and future resources...on a consistent and comparable basis.” Guideline 4(i) requires “an assessment of all technically feasible and cost-effective improvements in the efficient use of electricity.” *PacifiCorp’s 2021 Integrated Resource Plan*, Docket No. 21-035-09, Order (issued June 2, 2022), at 14 [hereinafter 2021 IRP Order].

concerns it had in the 2021 IRP cycle. PacifiCorp discussed its decision to use a 10-year life during the April 13, 2023, public input meeting.¹⁸

A 10-year depreciable life effectively makes a natural gas resource look more expensive, relative to resource alternatives, in the capacity expansion model; this modeling assumption reflects real-world risks to ensure that likely ratepayer impacts associated with new natural gas resources are appropriately accounted for in resource planning (i.e. will lead to the development of a least cost, least risk portfolio). PacifiCorp's use of a 10-year depreciable life is a reasonable modeling assumption that reflects actual costs and risks facing ratepayers. Specifically, given the necessary and ongoing transition away from fossil fuels, it would be unreasonable to assume that ratepayers will pay for "used and useful" natural gas resources for forty years. A significantly shorter life is warranted.

In order to avoid the most devastating impacts of climate change, the best science tells us we must reduce economy-wide emissions of climate pollution at least 50% by 2030 and achieve net-zero carbon emissions by 2050. This is consistent with the United States' Nationally Determined Contribution ("NDC") under the Paris Climate Agreement. The NDC commits to achieving economy-wide emission reductions of 50-52% below 2005 levels by 2030.¹⁹ In response to the updated NDC, various modeling efforts have been undertaken to identify and quantify the policies and emission reductions needed across the economy to achieve the U.S. NDC. The most compelling study is a meta-analysis of the results of six modeling efforts

¹⁸ *PacifiCorp 2023 Integrated Resource Plan, Amended Final, Volume II*, at 107 [hereinafter *2023 IRP Volume II*].

¹⁹ The United States of America Nationally Determined Contribution (2022), available at: <https://unfccc.int/sites/default/files/NDC/2022-06/United%20States%20NDC%20April%202021%202021%20Final.pdf>.

developed by researchers at the Electric Power Research Institute, the Lawrence Berkeley National Laboratory, and other institutions.²⁰ Surveying these analyses, several findings are consistent, including the importance of *rapidly reducing emissions from the power sector*.²¹ Across all models evaluated, rapidly decarbonizing the electricity sector is key to meeting the U.S.'s NDC. Specifically, the models show power sector emission reductions of 77 – 85% below 2005 levels by 2030.²²

As discussed in more detail in WRA's 2021 IRP comments,²³ climate change is increasingly relevant in resource planning. Ratepayers are being called upon to bear the costs of both mitigating climate change (i.e. transitioning away from fossil fuels) and adapting to climate change (e.g. paying for wildfire mitigation strategies and corporate liability). These costs are not externalities; they are already in rates (or potentially being deferred for later recovery). It is appropriate to reflect increasing/additional costs in resource planning models to reflect the reality that climate impacts and costs are growing. This is not to say that ratepayers are appropriately the sole bearers of climate risk, but the reality is that the costs of climate change are already falling on ratepayers' shoulders. Using a 10-year depreciable life for new natural gas resources is an appropriate effort to avoid burdening ratepayers with unnecessary future costs, such as stranded asset costs for resources that cause climate pollution.

²¹ John Bistline, Nikit Abhyankar, Geoffrey Blanford, Leon Clarke, Rachel Fakhry, Haewon McJeon, John Reilly, Christopher Roney, Tom Wilson, Mei Yuan, and Alicia Zhao. 2022. "Actions for reducing US emissions at least 50% by 2030," *Science* 376 (6596). DOI: 10.1126/science.abn0661.

²² *Id.*

²³ *Comments of Western Resource Advocates*, Docket No. 21-035-09 (filed March 4, 2022).

It is not in ratepayers' interests to assume there will be no additional costs or constraints facing new natural gas resources within, roughly, a decade of their coming online. Climate change presents real stranded cost risk for natural gas and other fossil-fueled resources. While it is tempting not to burden future natural gas plants with constraints that don't currently exist for resource planning purposes, it is myopic and overly optimistic (to use the Division's term) to conclude that natural gas resources will be unfettered for the next forty years. Ten years is a reasonable, risk-aware modeling assumption that protects ratepayers.

PacifiCorp's assumed 10-year life for natural gas resources does not violate the guideline to compare resources on a consistent and comparable basis (Guideline 4b) because it is a realistic judgment call given current circumstances. The Guidelines require the IRP to consider "all present and future resources, including future market opportunities (both demand-side and supply-side), on a consistent and comparable basis."²⁴ This includes an "assessment of all technically feasible generating technologies,"²⁵ the end result of which should be "the selection of the optimal set of resources given the expected combination of costs, risk and uncertainty."²⁶ Given the long-term nature of resource planning, these requirements necessitate judgement calls about both existing and future technologies in terms of cost, availability, risks, and operating considerations. It is as important to make reasonable assumptions about the economic viability of existing resources going into the future as it is to make reasonable assumptions about the future commercial viability of emerging technologies. The Commission has reaffirmed over the years that the IRP is not meant to lock in resource decisions, but rather to assess a wide variety of

²⁴ Guidelines, *supra* note 1, at 42.

²⁵ *Id.* at 43.

²⁶ *Id.* at 41.

options “in the search for the optimal set of resources given the expected combination of costs, risks and uncertainty over the long-run to provide electric service to customers.”²⁷ This exercise necessitates informed judgement calls about the conditions affecting existing as well as emerging resource technologies.

WRA supports PacifiCorp’s decision to use a ten-year economic life rather than a 40-year engineering life for natural gas resources. A 10-year life more properly addresses the potential risks associated with developing new natural gas resources than would any longer life. In light of the risk associated with new natural gas resources, a 10-year useful life is a reasonable modeling assumption and does not result in inconsistent or incomparable treatment of resource options.

IV. Renewable Resources and Battery Storage Were Treated Realistically.

The Division argues that by treating some resources “optimistically” and other resources “pessimistically,” PacifiCorp violated Guideline 4(b),²⁸ which requires “an evaluation of all present and future resources...on a consistent and comparable basis.”²⁹ The Division includes renewables, battery storage, the Natrium plant and non-emitting hydrogen peakers in the optimistic category; while natural gas, coal, and carbon capture, utilization, and sequestration (“CCUS”) technologies make up the pessimistic category.³⁰ WRA disagrees that PacifiCorp

²⁷ *In the Matter of the Acknowledgment of PacifiCorp’s Integrated Resource Plan 2004*, Docket No. 05-2035-01, Report and Order (issued on July 21, 2005), at 3; *see also In the Matter of PacifiCorp’s 2011 Integrated Resource Plan*, Docket No. 11-2035-01, Report and Order (issued March 22, 2012), at 3-4; *In the Matter of PacifiCorp’s 2013 Integrated Resource Plan*, Docket No. 13-2035-01, Report and Order (issued January 2, 2014) at 5; *In the Matter of Rocky Mountain Power’s 2015 Integrated Resource Plan*, Docket No. 15-035-04, Report and Order (issued January 8, 2016), at 6.

²⁸ *DPU Comments*, *supra* note 4, at 3.

²⁹ *Guidelines*, *supra* note 1, at 42-43.

³⁰ *DPU Comments*, *supra* note 4, at 17.

treated the costs and risks associated with renewables and battery storage optimistically.³¹ In our view, PacifiCorp treated their costs and risks realistically.

The modeling assumptions for any generating technology, including permitting and construction lead time; fixed, variable, and fuel costs; as well as the feasibility of a reliable fuel supply, must be based in reality for inclusion in any least-cost, least-risk modeling exercise. With respect to Natrium and hydrogen peakers, the Division raises reasonable concerns related to cost, fuel supply, and commercial lead times to justify the “optimistic” label applied to these technologies when compared to CCUS. We paraphrase and summarize DPU’s concerns as follows: 1) the plant costs were not based on actual bids or proposals; 2) neither technology has been demonstrated at utility scale; 3) the fuel sources for Natrium or hydrogen peakers have not been secured by the Company or any utility to date.³² The Division notes that the Company used these same criteria to explain why the variant with CCUS was not chosen, and asserts that both Natrium and non-emitting hydrogen peakers should have been subjected to similar scrutiny. This comparison forms the basis for the argument that these resources are being treated “optimistically” compared to CCUS, natural gas, or coal. Later in their comments the Division

³¹ While terms such as “optimistic” and “pessimistic” are likely not descriptive nor precise enough terms for assessing comparable treatment of resources in a complex modeling exercise like the 2023 IRP, we understand the tenor of the Division’s comments to broadly suggest that the Company did not place all resource types on an equal footing. Specifically, we understand the Division’s definition of resources treated “optimistically” to be emerging technologies that weren’t subject to the same scrutiny with respect to cost projections, lead times, and general viability as other uncertain technologies, while the Division considers resources treated “pessimistically” to be existing technologies like natural gas or coal, that were allegedly forced out due to invalid assumptions, or emerging technology like CCUS, that was passed over in the Company’s portfolio selection process due to technological uncertainty.

³² *DPU Comments, supra* note 4, at 25.

asserts that renewables and battery storage were treated optimistically without providing analysis or justification.³³

However, when using the Division's criteria outlined above, it is clear that renewable resources and battery storage are distinguishable from Natrium and hydrogen peakers. To the first criterion regarding costs: the costs of renewables (primarily wind and solar) and battery storage are known, transparent, and frequently the least-cost resource option as indicated by the resources selected in the Company's most recent completed competitive solicitation process, which procured 1,792 MW of wind, 495 MW of solar, and 200 MW of battery storage.³⁴ No bids for natural gas resources were received in the 2020 AS RFP.³⁵ Regarding the second condition on commercialization: energy storage and renewables are mature technologies demonstrated at utility scale for decades, collectively comprising 82% of all utility capacity additions in the last year and should not be misclassified with emerging technologies like hydrogen, CCUS, or advanced nuclear.³⁶ Finally, regarding secure fuel sources: renewables are obviously not subject to this concern nor the inherent price volatility that accompanies most fuel types. The Division goes on to state that "...renewables and batteries (in some combination) will play an increasingly dominant role in the next 30 or 40 years. However, other options should not be foreclosed by

³³ *DPU Comments, supra* note 4, at 17. "The Company treats certain resources optimistically (renewables, battery storage, the Natrium plant, and hydrogen non-emitting peakers) and other resources pessimistically (natural gas, coal and CCUS technologies)."

³⁴ *2023 IRP Volume II*, at 411.

³⁵ *2023 IRP Volume I*, at 242.

³⁶ Wind, solar, and battery storage accounted for 82% (44.5 GW compared to 54.5 GW total) of generating capacity additions in 2023. Natural gas (7.5 GW) and nuclear (2.2 GW) accounted for the remaining 18% of capacity additions in 2023. U.S. Energy Information Administration, *More than half of new U.S. electric-generating capacity in 2023 will be solar* (February 6, 2023), available at <https://www.eia.gov/todayinenergy/detail.php?id=55419>.

making unwarranted assumptions.”³⁷ Even if natural gas and coal are being foreclosed by “unwarranted assumptions,” Division provides no evidence that the Company applied unwarranted or overly optimistic assumptions to renewables or batteries in the modeling.

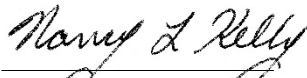
Applying the Division’s criteria used to justify their “optimistic” designation of Natrium and non-emitting peakers relative to other emerging technology may have merit, but it does not make sense for renewables or storage. WRA disagrees with the Division’s inclusion of renewables and battery storage in the same “optimistic” category as Natrium and non-emitting peakers.

Dated this 31st day of January 2024. Respectfully submitted,

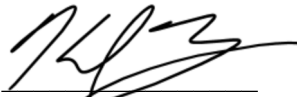
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³⁷ *DPU Comments, supra* note 4, at 27.

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