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PublicService Commission <psc@utah.gov>

Public Comment - Docket No. 25-035-22 (PacifiCorp 2025 IRP)

1 message

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To: psc@utah.gov

"Public Comment - Docket No. 25-035-22"

To: Utah Public Service Commission - Rocky Mountain IRP Should Add Consumptive Water Projections

As a Rocky Mountain Power (RMP) rate payer, I am requesting that the PSC require RMP to include a detailed consumptive water resource plan for Utah in its current and future Integrated Resource Plans.

The consumptive water resource plan should include a baseline analysis of the current water consumption of its current power plants as well as a projection to 2045 of its future power generation plans.

The current Rocky Mountain Power IRP fails to discuss the large water consumption of its current Utah power operations
and makes no mention of how RMP plans to conserve water by using more efficient power sources by 2045.

Rationale for the Request:

1. The State of Utah is in a long term aridification crisis with no permanent, scientifically proven and securely funded water conservation solutions on the horizon.

2. In the Great Salt Lake (GSL) watershed, the lake has already lost twenty feet in depth and is unlikely to ever recover to the healthy level. RMP has two high water consumption natural gas power plants in the Great Salt Lake watershed.

3. The RMP hydropower units in the GSL watershed are at serious risk due to aridification.

4. In the Sevier River watershed, the Sevier Lake is now permanently dry with no indication that building new reservoirs will provide any relief. To the extent that Rocky Mountain Power plans to utilize Utah's "energy corridor" in the next twenty years, its consumptive water plan must take into account the severe water crisis in this watershed.

5. In the Colorado River watershed, the Upper Basin States are projected to breach their long standing Colorado River commitments to senior Colorado River water users this year.

The old-fashioned, subcritical coal fired Hunter and Huntington power plants use significantly more water per megawatt hour than modern ultra supercritical power plants thus contributing to the Colorado River water crisis.

TerraPower management claims that RMP is going to purchase either power from or purchase the entire operation of the Kemmerer Natrium unit which will place further stress on the Colorado River watershed.

Against this dire background, it is extraordinary to find that the 2026 Rocky Mountain IRP (almost 300 pages long) devotes no discussion to the current net water consumption of its power generation facilities let alone any discussion of water optimization for power generation thru 2045 in the dessicated Utah environment.

We respectfully ask that the PSC direct Rocky Mountain Power to produce a current and future water consumption plan for its power generation units serving Utah to demonstrate that it can deliver the power that Utah needs within our severe water constraints.

Thank you.

Craig Wallentine
Park City