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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

MISCELLANEOUS CORRESPONDENCE AND REPORTS REGARDING ELECTRIC UTILITY SERVICES; 2021	Docket No. 21-999-01 <b>WESTERN RESOURCE ADVOCATES' REQUEST TO PARTICIPATE IN CONFIDENTIAL TECHNICAL CONFERENCE SUBJECT TO CONFIDENTIALITY PROTECTIONS &amp; PETITION TO INTERVENE</b>
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Pursuant to Utah Administrative Code § R746-1-108 of the Public Service Commission (“Commission”) Rules, and the Commission’s May 11, 2021, Notice of Confidential Technical Conference (“Notice”), Western Resource Advocates (“WRA”) hereby requests permission to participate in the confidential technical conference scheduled for May 26, 2021. In the Commission’s Notice, the Commission indicated that the technical conference would be closed to the public and that attendance would be limited to designated representatives of the Commission, PacifiCorp, the Division of Public Utilities, and the Office of Consumer Services. The Commission directed any interested person that objects to the Commission’s determination to close the technical conference to the public to submit a written objection by May 17, 2021. While WRA does not object to the technical conference being closed to the general public, WRA requests that it be permitted to attend the technical conference subject to the Commission’s

confidentiality rules (i.e. as a party) or pursuant to another non-disclosure agreement as requested by PacifiCorp.

In support of this request, WRA states as follows:

WRA is a non-profit organization that addresses climate change to sustain the environment, economy, and people of the West. WRA's Clean Energy Program staff of policy experts, economists, and attorneys develops and implements evidence-based solutions to realize the benefits of a decarbonized electricity system that is reliable and economic for customers. WRA is dedicated to furthering regional coordination through markets and other initiatives to economically and reliably operate the rapidly changing energy mix and the carbon-free electricity supply of the future. WRA has a Utah office, Utah representation on its board of directors, and supporters and donors who live in Utah and are ratepayers with PacifiCorp, doing business in Utah as Rocky Mountain Power. WRA has participated in electric utility proceedings for 30 years and has been granted intervenor status in multiple Utah Commission dockets. WRA has demonstrated its willingness and ability to comply with PacifiCorp's confidentiality requirements and the Commission's rules.

WRA does not object to the designation of the technical conference as confidential; we believe it is likely that PacifiCorp has appropriate reasons for designating as confidential information to be presented in the technical conference. WRA requests to participate in the confidential technical conference as a party subject to the Commission's confidentiality rules (Utah Admin. Code §§ R746-1-601 - 606) or by signing a confidentiality agreement as requested by PacifiCorp.

WRA has reached out to PacifiCorp to inquire whether PacifiCorp objects to our participation in the confidential technical conference. PacifiCorp indicated it would allow

WRA's participation if representatives first sign a non-disclosure agreement. WRA representatives will sign a non-disclosure agreement, either with PacifiCorp or pursuant to Utah Admin. Code R746-1-602, prior to attending the technical conference.

WRA requests that the Commission treat this filing as a petition to intervene to the extent the Commission deems granting party status is necessary for participation. WRA has not determined specific positions it will take or the relief it will seek. WRA seeks to intervene for purposes of attending the confidential technical conference and protecting its interests as they arise. The interests of justice and the orderly and prompt conduct of this proceeding will not be materially impaired by allowing WRA to intervene.

WRA's interests in this docket are related to the economics, economic risks, resource adequacy, and operational reliability of PacifiCorp's electricity supply—issues that may be considered in the confidential technical conference that will address how the recent actions of the California Independent System Operator ("CAISO") to disallow buy-through during times of system stress could affect PacifiCorp's summer readiness. WRA is an active participant in PacifiCorp's integrated resource planning proceedings and CAISO's stakeholder processes, as well as investigations of market issues in other states. WRA engages in various regional coordination and market expansion initiatives in the West. WRA has a seat on the Northwest Power Pool's Resource Adequacy Program Stakeholder Advisory Committee and on the Western Electricity Coordinating Council Member Advisory Committee. Access to this docket would provide WRA with additional perspective needed to promote a decarbonized grid that is both affordable and reliable. Further, understanding how PacifiCorp will respond to 2021 summer conditions will be critical to appreciating opportunities for future regional coordination between utilities outside of the CAISO footprint.

WRA requests that all pleadings, correspondence, discovery, and other documents be served on the following:

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WRA also requests that the following names be added to the electronic service list for this docket: Callie Hood (callie.hood@westernresources.org).

WHEREFORE, WRA respectfully requests that the Commission allow WRA to participate in the confidential technical conference subject to the Commission's confidentiality rules or other non-disclosure agreement as requested by PacifiCorp. If necessary, WRA also requests that the Commission permit WRA to intervene in this docket.

Dated this 17<sup>th</sup> day of May 2021.

Respectfully submitted,

WESTERN RESOURCE ADVOCATES

A handwritten signature in black ink, appearing to read 'SHAYES', written over a horizontal line.

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