

Jean Jewell

From: michael@renewablenw.org
Sent: Friday, August 07, 2015 11:47 AM
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Subject: Case Comment Form: Michael O'Brien

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Name of Utility Company: Rocky Mountain Power Acknowledge public record: True

Comment: Renewable Northwest would like to congratulate PacifiCorp, DBA as "Rocky Mountain Power (the "Company"), on the high degree of stakeholder involvement during its 2015 Integrated Resource Plan ("IRP") Public Process, which can be continued into future IRPs and used as a model for other utilities.

At the beginning of the 2015 IRP process, the U.S. Environmental Protection Agency ("EPA") issued a major proposed rule under §111(d) of the Clean Air Act ("111(d)") that would regulate carbon dioxide emissions from existing fossil fuel power plants. Renewable Northwest would like to acknowledge Rocky Mountain Power's efforts in attempting to model this proposed rule in its 2015 IRP. The publication of the EPA's final rule on 3rd August, 2015, provided clarification of the various compliance pathways afforded by 111(d). As Idaho looks toward drafting its State plan, and as the Company begins modeling compliance with the final rule, Renewable Northwest recommends that the Commission maintain the integrity of existing environmental commodities—such as Renewable Energy Credits—and their associated markets.

Renewable Northwest would also like to recognize the progress that Rocky Mountain Power has made in planning for variable energy resource integration, as reflected in the Company's 2014 Wind Integration Study ("WIS"). The 2014 WIS determined that a modest increase of only 1 MW in wind regulating margin (the incremental amount of reserves required to accommodate deviations of wind generation from forecasts) was required between 2012 and 2014 to accommodate a 417 MW increase in wind capacity. Furthermore, the Company's Distributed Generation Resource Assessment for Long-Term Planning Study highlighted the large amount of potential commercial-scale solar photovoltaic that could be deployed in Rocky Mountain Power's Idaho service territory.

Renewable Northwest appreciates the opportunity to comment to the Commission. We would also like to acknowledge our appreciation of the Company's well-run and engaging stakeholder process, and look forward to engaging with the Commission and the Company in exploring the increasing role of renewable energy in the IRP in light of the 111(d) final rule.

Sincerely,
/s/ Michael O'Brien
Energy Policy Analyst
Renewable Northwest

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