



NTTG 2018-2019 Public Policy Consideration Draft Study Plan Stakeholder Comment Form

Open Comment period May 21, 2018 through June 1, 2018

Please submit comments to info@nttg.biz

Commenter Contact Information

Date May 31, 2018
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Stakeholder Comments

Study Plan Section	Page/Line #	Comment
Base Case Building Process and Assumptions	Page 1 / Line #20, Line #24 & Line #27	The NTTG Regional Plan is built on the members submission of their local plan which is a 10 year window. Section 2.1 of PacifiCorp's Attachment K, Preparation of a Local Transmission System Plan, states: "The Local Transmission Plan shall study a ten (10) year planning horizon, unless an Eligible Customer's request submitted through the Tariff process specifically identifies a future new resource location on a 20 year horizon". Section 3.7 of PacifiCorp's Attachment K, Preparation of Regional Transmission Plan, states: "The Planning Committee will biennially prepare a long-term (10-year) bulk transmission expansion plan (the "Regional Transmission Plan")". The PPC study window should be limited to no later than 2028, which covers the same time-frame as the 2018-2019 NTTG biennial study period and the local and regional plan; therefore, Naughton Unit 1 and Unit 2 which retire 12/29/2029 (online 2028 and offline 2029) and Jim Bridger 1 which retires 12/31/2028 (online 2028 and offline 2029) should be removed from the list.
Base Case Building Process and Assumptions	Page 2 / Line #34 & Line #35	Replacing Bridger 1 and Naughton 1 & 2 resources is outside of the 10 year planning horizon. However, their replacement resources in the 2017 IRP update, posted in May 2018, are covered by market purchases. Market purchases – Front Office Transactions (FOTs) are used as place holder to minimize the risk of committing resources beyond the time required to bring a resource on-line; typically, it takes three to four years to plan and install a new resource, the reason for "annual" IRP updates. PacifiCorp's make-up power for Jim Bridger 1 & Naughton 1 & 2 should be from market purchases.