

Final Request  
Submitted March 29, 2018  
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#### NTTG Public Policy Consideration Request

Requested by (Joint Parties):

Wyoming Industrial Energy Consumers  
Utah Association of Energy Users  
Utah Associated Municipal Power Systems  
Deseret Power  
Utah Department of Commerce Office of Consumer Services  
Utah Municipal Power Agency

The Joint Parties request that a Public Policy Consideration evaluation be conducted to examine how regional and interregional public policies, and coal resource reductions associated with wind resource additions, can impact the transmission needs within the NTTG footprint. For example, the CAISO recently completed its 50% RPS Out-of-State Portfolio Assessment which focused, among other things, on the ability to import up to 2000 MW of wind resources to California from Wyoming. The CAISO concluded the Energy Gateway (EG) West and South segments, in conjunction with certain interregional projects, enabled imports into the CAISO region. This Public Policy Consideration evaluation is intended to determine whether the NTTG system can operate reliably without certain segments of the EG transmission projects if exports to other western regions are reduced by reducing coal resources in place of wind additions. The coal resource reduction could be accomplished by reducing the output of specific coal generating units where wind additions are being made.

Recognizing that:

- (i) wind resource additions are being submitted to NTTG in the Wyoming area with known transmission constraints; and
- (ii) those resource additions are highly variable in nature; and
- (iii) the online date for certain wind resources is not primarily driven by a need to reliably meet load growth within the NTTG region, but rather economic drivers to recognize the long term benefits of low variable cost resources and federal production tax credits; and
- (iv) certain wind resource additions facilitate substantial and opportunistic exports from NTTG to achieve "off-system sales" at varying times of the year.

The reduction in output of specific coal resources can be analyzed to compare the economics of wind additions and reduced exports to the cost of specific Energy Gateway transmission segments. This will provide an important metric to evaluate the impact to NTTG's transmission system from public policies across the west that contribute to NTTG exports to other regions.

Study Details:

For each "High Wyoming Wind," "High Southern Idaho Export," or similar type power flow case with heavy exports to other regions selected to be studied by NTTG in the 2018-2019 Study Plan, perform a coal resource reduction analysis that includes the following specific changes:

1. Identify the net export level for the stress condition cases for the combined NTTG region.
2. Reduce the output of (or remove from service) the following coal resources (located near wind resource additions), from the level of output in the stress condition cases down to the minimum generation level required to maintain local reliability. Reduce the coal generation until the net NTTG export level is reduced to between 0-500 MW for the given case.

- i. Jim Bridger 1
  - ii. Jim Bridger 2
  - iii. Jim Bridger 3
  - iv. Jim Bridger 4
  - v. Dave Johnston 1
  - vi. Dave Johnston 2
  - vii. Dave Johnston 3
  - viii. Dave Johnston 4
  - ix. Naughton 1
  - x. Naughton 2
  - xi. Naughton 3
  - xii. Wyodak
- 3. To account for each of the coal resource reductions made to the above generators inside the NTTG footprint, increase resource output of available generators outside the NTTG footprint to make up the difference based on a reasonable planning practice.
- 4. Perform power flow transmission reliability assessment and compare the transmission addition requirements to the transmission additions identified in the 2018-2019 planning cycle.
  - a. To the extent that there is not a change case being evaluated in the 2018-2019 RTP that represents the following transmission configuration, evaluate a change case that:
    - i. includes EG D2
    - ii. does not include EG D3, EG E, or EG F
    - iii. does include projects B2H and the Antelope projects in order to avoid unrelated known reliability violations

**Additional Note:**

The Joint Parties also request that during the 2018-2019 Cycle, NTTG provide improved clarity regarding resources in each of the study cases. Many comments were made during the last cycle attempting to better understand the resource mix in each case, how each type of resources output was determined, what resources were added and where, and the type and location of resources in the model. We request improved clarity regarding resources in both the NTTG study/reports as well as the Public Policy Request