



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 5/22/18
Name Bryce Freeman
Organization Wyoming Office of Consumer Advocate

Stakeholder Comments

Study Plan Section	Page/Line #	Comment
Base Case Building Process and Assumptions	1/20	The study plan states on page 1, beginning on line 7, that "These coal retirements have been 8 identified in NTTG members' Integrated Resource Plans (IRPs)." PAC's 2017 IRP lists the assumed retirement date for Bridger unit 1 as 2037; I can find nothing in the 2017 IRP Update (April of 2018) that indicates that the planned retirement date for Bridger unit 1 has changed. If we are using company IRPs as a guide for coal retirements, why would it be assumed that Bridger unit 1 would be out of service during the study window when the plant is not scheduled to retire until well beyond the end of the planning horizon? This is particularly true if Bridger 1 is assumed to be out of service for purposes of base case development. Wouldn't it be better to treat coal retirements that are not consistent with utility IRPs as sensitivities rather than incorporating them into base cases?