

Final Request

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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 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 retirements 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 by assessing the planned retirement of coal resources currently identified in NTTG members' Integrated Resource Plans (IRPs).

The Joint Parties note that they are committed to cooperating with the NTTG Planning Committee and that significant efforts and resulting revisions have been made to this Public Policy Consideration request in order to mitigate concerns expressed by the Planning Committee.

Recognizing that:

- (i) future changes in carbon reduction regulations could affect the retirement timeframes of coal resources within the NTTG region in the near future
- (ii) significant wind resource additions are being submitted to NTTG in the Wyoming area with known transmission constraints; and
- (iii) those resource additions are highly variable in nature; and
- (iv) 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
- (v) certain wind resource additions facilitate substantial and opportunistic exports from NTTG to achieve "off-system sales" at varying times of the year that provide benefits to parties outside of the NTTG region.

This Public Policy Consideration seeks to examine the impact of the planned retirement of coal resources, as incorporated in NTTG members' existing IRPs that extends two years beyond NTTG's current planning window. This case can be analyzed to provide some context regarding the significant cost of specific Energy Gateway transmission segments, relative to the addition of new wind resources and planned generation retirements just beyond the planning window. This will provide an important metric to

evaluate the impact to NTTG's transmission system from public policies across the west driving the development of renewable resources, the replacement of coal resources with wind and the interactions with other planning regions.

Study Details:

For each “High Wyoming Wind,” “High Southern Idaho Export,” “High Southern Idaho Import,” or other similar type power flow with heavy transmission flows or high exports to other regions selected to be studied by NTTG in the 2018-2019 Study Plan, perform an analysis (power flow only) that includes planned generation retirements through the end of 2029.

1. Model the following planned coal retirements through the end of 2029 (if not already removed) as currently identified for future retirement in NTTG member Integrated Resource Plans:
 - i. Naughton 3 - 2018
 - ii. Valmy 1 – 2019
 - iii. Boardman – 2020
 - iv. Cholla 4 – 2020
 - v. Colstrip 1 - 2022
 - vi. Colstrip 2 - 2022
 - vii. Dave Johnston 1 - 2027
 - viii. Dave Johnston 2 - 2027
 - ix. Dave Johnston 3 - 2027
 - x. Dave Johnston 4 – 2027
 - xi. Jim Bridger 1 - 2028
 - xii. Jim Bridger 2 - 2028
 - xiii. Naughton 1 - 2029
 - xiv. Naughton 2 - 2029
2. For each of the planned coal resource retirements, increase resource output of available generators outside the NTTG footprint as needed to make up the difference based on a reasonable planning practice.
3. 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