



May 31, 2022

Utah Department of Environmental Quality
Division of Air Quality
Bryce Bird, Director Division of Air Quality
PO Box 144820
Salt Lake City, Utah 84116-3085

Attn: Utah State Implementation Plan: Regional Haze Second Implementation Period Section XX.A

Re: Comments of UAMPS on Approval of Proposed Regional Haze Second Implementation Period Section XX.A

Filed via email: rwood@utah.gov

Dear Mr. Bird:

Summary

Utah Associated Municipal Power Systems (“UAMPS”) supports the State of Utah’s proposed State Implementation Plan for Regional Haze for the Second Planning Period (“RH SIP 2”), which was published for public comment on May 1, 2022. UAMPS supports Utah’s RH SIP 2 for the reasons stated therein, for the reasons stated in the comments submitted by PacifiCorp, and for the additional reasons stated herein.

UAMPS Interest in Hunter Unit 2

UAMPS is a part owner in Hunter Unit 2. UAMPS is a political subdivision of the State of Utah and provides comprehensive wholesale electric energy, transmission, and other energy services, on a nonprofit basis, to its members, who consist of 50 municipal and other community-owned electric utilities located in Utah, Nevada, New Mexico, Idaho, Wyoming, and California. UAMPS currently manages 17 separate projects that provide power supply, transmission, and other services to participating members. One of these projects is UAMPS’ undivided 14.582% ownership interest in Hunter Unit 2 in which 23 of its members participate. These participating members are all small, serving an average of 4,247 customers, and have populations less than 60,000. UAMPS’ ownership in Hunter Unit 2 represents approximately 63 MW, which provides

approximately 503,410 MW hours for UAMPS and its participating members and translates to powering approximately 63,000 homes spread among a diverse group of UAMPS communities.

UAMPS Supports PacifiCorp Comments

UAMPS supports the comments submitted by PacifiCorp in support of RH SIP 2 and opposes any regulatory requirement to install SCR on Hunter Unit 2. In addition to owning interests in or directly operating power plants and other sources of electrical power, UAMPS and its members regularly purchase power off the grid, and are, therefore, sensitive to market and regulatory forces that impact electricity affordability and reliability. With an undivided 14.582% ownership interest in Hunter Unit 2, UAMPS and its participating members could face significant adverse economic impacts from a regulatory requirement for PacifiCorp to install SCR on Hunter Unit 2.

Sincerely,

Mason Baker

Mason Baker,
Chief Legal Officer & General Counsel
Utah Associated Municipal Power Systems