

Comments by James Adcock on Integrated Resource Planning rulemaking UE-191023

Docket number of this proceeding: UE-191023

Commenting party's name: James Adcock, Electrical Engineer

The title and date of the comment or comments:

Comments by James Adcock on UE-191023 Mid-C and other standardized trading hubs in regard to delivery of coal-fired resources.

6/11/2020

James Adcock

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Re: Docket UE-191023: Mid-C and other standardized trading hubs in regard to delivery of coal-fired resources.

I do not support an exception to the "no coal" rule, as implemented by the executive attestation "has reviewed all e-tag data for the prior calendar year and found no electricity from coal-fired resources was included in market purchases and therefore no such electricity was included in retail customer rates."

However, if UTC does choose to allow such an exception for trading hubs such as Mid-C, I would ask:

- 1) That the exception only be temporary in nature in order to allow for the development of "No Coal" trading markets.
- 2) That utilities have to publicly report yearly how much coal power they have purchased through trading hubs, so that the nature and extent of this "Coal Leakage" can be publicly recognized and considered.

Thank you for your consideration,

James Adcock

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