Dear MEAN,

In regard to MEAN's five year Integrated Resource Plan (IRP) process, I am commenting on the following. Carbon emissions on our planet personal affects me and my community with hot dry weather and CO fires devastating thousands of people and reducing air quality for us all!!!! Major heath issues are directly occurring.

1. **MEAN needs to start lowering carbon emissions now, not after 2038 including a series of clear interim goals and how they will be measured.** MEAN has established a "carbon neutral" goal for 2050, which is a long time away. MEAN has inadequate interim goals for progress toward this objective, and it appears MEAN intends coal burning "business as usual" until 2038. **There is no real explanation about how MEAN will become "carbon neutral" at some point after that date. MEAN intends to rely heavily on coal through at least 2038 and plans to only decrease its coal reliance from 54% (today) , to 50% over the next fifteen years.** More than fifty billion pounds of carbon emissions could be eliminated by MEAN between now and the 2050 goal of carbon neutrality, if decarbonization begins now and not sometime beyond 2038.

1. **We do not want to see any new natural gas electrical generation plants. MEAN has plans to build some kind of new capacity** to deal with a projected power deficit in the 2024-29 period. It is not **straightforward or transparent about what this new resource might be. It is essential that it not be more carbon. For example a new natural gas electrical generation plant**. This is not acceptable and deceitful. The public needs to know.

With natural gas prices increasing significantly due to geopolitical tensions and war in Europe, more US natural gas production is headed across the Atlantic as liquified natural gas. This could very likely disrupt what MEAN's ratepayers will see in the future if this volatile commodity has an increased role in MEAN's electrical generation portfolio. Most energy suppliers in the State of Colorado are moving away from high-priced carbon electricity to lower-priced industrial wind and solar production. MEAN should follow suit.

Additionally, fugitive emissions of methane–a much more potent greenhouse gas than carbon dioxide, occur along the natural gas supply chain from the wellhead to the end user–are largely unaccounted for. If leaks exceed 3% of the supply chain, the carbon emissions from natural gas exceed that of coal. The EPA estimated (2014) these sources of methane result in 23% of all methane emissions in the U.S, or 155 MMt of carbon dioxide equiv. in 2012.

1. **Improve your energy efficiency!! Many of the system's needs could be met by promoting energy efficiency and energy conservation.** MEAN's approach undervalues the potential of energy conservation. MEAN intends to continue their current energy efficiency and conservation programs, but to add only one additional program–and

this has yet to be officially approved. Ted Light, a utility expert who has reviewed MEAN's IRP, stated: "Something is clearly amiss with MEAN's evaluation of potential new energy efficiency programs.

1. **Better manage demand to reduce peak loads.** The IRP also fails to give appropriate emphasis to managing demand to reduce system peak load requirements. This could be an effective alternative to acquisition of new generating capacity. There may be something wrong with MEAN's methodology for reviewing Demand Side Management ("DSM"), but there is not enough information given to determine where the error is.

1. **Retire/or divest their positions in their dirty coal plants.** The status quo of coal generation over the next fifteen years presented in the draft IRP does not consider the early retirement of these coal power generation facilities that many utilities nationwide are engaging in, nor divestiture (to minimize MEAN's retirement exposure) of any of these plants where MEAN holds minority interests. Renewable energy generation is cost competitive and reliable. Its intermittent nature is not problematic until a utility reaches high percentages of renewables and many utilities have now demonstrated this fact.

1. **Stop this shell game and clean up their electrical generation portfolio.** The **Renewable Resources Pools** discussed in the draft IRP appear to bring customers in communities such as **Gunnison**, Colorado to 100% renewables (or quickly approaching these high percentages in **Gunnison**). That is just a shell game as it is not mechanically possible to deliver anywhere near those percentages of renewable energy to these communities. More renewable energy needs to be added so that all MEAN ratepayers have access to cheaper renewable electricity.

Sincerely,

Nicole Blaser

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