Re: Dockets: I-15-001 and I-16-002

The Alaska Public Interest Research Group (AkPIRG) was founded in 1974 as a non-profit, non-partisan, citizen-oriented statewide organization focused on researching, educating, and advocating on behalf of public and consumer interests. AkPIRG is affiliated with the federation of PIRGs, U.S. and Canadian non-profit organizations standing up for consumers.

In regard to RCA docket numbers I-16-002 and I-15-001 AkPIRG is primarily concerned with the group of organizations and interests who will participate in the Railbelt Reliability Council (RRC), including future regional integrated resource planning efforts. AkPIRG is concerned that interests other than those of utilities may be sidelined.

It is unusual for those who fund a council or organization to have little say in how that council is established. As stated in the currently proposed RRC MOU, “The RRC will fund its operations through member dues and an annual system administration fee collected from users within the Railbelt.” AkPIRG believes it is imperative to include consumer voices on any RRC implementation committee, as well as the RRC’s Board of Directors.

It is also crucial that consumers have a voice in the development and implementation of regional integrated resource planning so that issues as far-ranging as equity and carbon pricing are factored into the plan for the region. These decisions will have long-term impacts on consumers and therefore should be, at least in part, decided by them.

AkPIRG is also concerned that ATC’s proposal to form a new transmission entity for the entire Railbelt region may unnecessarily cost consumers if consumers are not part of the planning process to ensure that only cost-effective new transmission is built.

Without consumer advocate input on the RRC governance board or implementation committee, Railbelt consumers may well be overcharged for capital expenditures.

Additionally, AkPIRG is concerned about diversifying the Railbelt’s generation portfolio. Natural gas prices are volatile. As other sources of renewable energy become less expensive, it is crucial that the RRC provide for their entrance into the Railbelt region. This will benefit Railbelt region consumers by stabilizing costs with generation sources that do not rely on fuel.

Thank you.

Sincerely,

Veri di Suvero
Executive Director