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Subject: Juneau Hydropower Comments R-20-002(3)
Date: Friday, October 16, 2020 4:42:35 PM
Attachments: [JHI RCA comments R-20-002\(3\) 10-16-20.pdf](#)

Dear RCA Commissioners,
I would like to submit the attached comments on the IRP matter and the upcoming technical conference.

Thank you and have a good weekend.

Duff W. Mitchell
Managing Director

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October 16, 2020

Regulatory Commission of Alaska
701 W. 8th Avenue, Suite 300
Anchorage, AK 99501

RE: Docket R-20-002(3) Comments of Juneau Hydropower, Inc. Regarding the October 21-22, 2020 Technical Conference Agenda and Talking Points in the Matter of the Consideration of Regulations Implementing Legislation Governing Electric Reliability Organizations' Integrated Resource Planning and Preapproval Requirements for Large Energy Facilities

Dear Commissioners,

Although this docket is focused on ERO's with the prospect of immediate regulations for the Railbelt, these regulations will have precedential effect statewide on future ERO's. Therefore, Juneau Hydropower requests consideration of its comments in this matter.

I would like to entertain the following comments for participation on Integrated Resource Planning minimum elements.

I have noticed that there is little or no input or consideration under R-20-002 (3) for local or community energy policies, climate action plans and renewable energy requirements established by local governments. Since local governments decide and implement community values through such plans, there should be methodology respected by the RCA and IRP processes to allow local governments and community values to be expressed in Integrated Resource Plans.

Under Section 8) Identification of Preferred Resource Portfolio (PRP) a) Criteria for determining cost effectiveness and greatest value...I suggest that the greatest value incorporate local community values as established by local governments.

Since we are developing our Alaska IRP process, we have the opportunity to have our Alaska IRP process be inclusive and transparent and ensuring greater public support and participation in enabling local community values to be expressed in Integrated Resource Planning. Alaska can and should be a leader in this effort.

thank you for your consideration of my comments,

A handwritten signature in black ink, appearing to read "Duff W. Mitchell", written over a horizontal line.

Duff W. Mitchell
Managing Director