



December 15, 2025

TO: Public Service Commission of Utah

FROM: Enyo Renewable Energy, LLC
Sommer Moser

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Attorneys for Enyo Renewable Energy, LLC

RE: Docket No. 25-R318-01 – Comments
In the Matter of: Proposed Rulemaking Concerning Utah Code §§ 54-26-101 to -
901, Large-Scale Electric Service Requirements

Enyo Renewable Energy, LLC (“Enyo”), through its counsel, respectfully submits these comments on the Public Service Commission of Utah’s (“Commission”) Notice of Proposed Rulemaking, R746-318, Large Scale Electric Requirements, published in the Utah State Bulletin, November 15, 2025, Vol. 2025, No. 22, implementing Utah’s Large-Scale Electric Service Requirements (the “Proposed Rules”). Enyo appreciates the opportunity to submit these comments and for the Commission’s consideration of Enyo’s comments.

I. Introduction

Enyo has been a participant in Commission Docket No. 25-R318-01 since its inception and has substantively engaged at each opportunity to provide feedback and discussion for the benefit of the Commission in adopting final rules. Implementation of Senate Bill 132, codified as Utah Code Ann. §§ 54-26-101 to -901 (“S.B. 132”) consistent with S.B. 132’s intent to attract

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and ensure access for large load customers in Utah, while also insulating existing retail customers from cost impacts, has been an area of significant importance for Enyo.

Enyo is a Utah-based company that develops utility-scale energy projects, including solar, storage, and natural gas resources, that are co-located with industrial load sites, enabling Enyo to provide onsite generation capacity to load. Enyo currently has multiple large load requests pending with Rocky Mountain Power and therefore has both a direct interest in the outcome of this rulemaking as well as a direct interest in supporting large load development in Utah in a manner that is cost-effective and efficient. Based on this experience, Enyo also has first-hand knowledge about interconnection and cost-allocation barriers that S.B. 132 was designed to address.

As Enyo's comments have consistently conveyed, Enyo is interested in the Commission beginning its investigation into the development of a Large Load Flexible Tariff ("LLFT") as quickly as possible; however, as Enyo's comments have also made clear, Enyo recognizes that this rulemaking will conclude prior to the Commission beginning a LLFT investigation and is not seeking to usurp or otherwise pre-judge the outcome of the LLFT investigation. However, the Commission's final rules should not frustrate the development of a future LLFT, nor should they allow for a qualified electric utility to impose evaluation requirements that fail to consider net load when generation and load are physically adjacent and contractually paired.

II. Comments on Proposed Rules

Enyo incorporates all of its prior comments submitted in Docket No. 25-R318-01 into these comments by reference. Enyo has also reviewed comments from NRG Energy ("NRG") and Tract Capital Management, LP ("Tract") (together, "NRG/Tract") in response to the Commission's Proposed Rules and generally concurs with the positions expressed by NRG/Tract

therein, and so will not restate those arguments and positions here. Instead, Enyo emphasizes here that the Proposed Rules do not go far enough to achieve S.B. 132's goals of establishing alternative frameworks for large load customers in Utah in minimally two critical ways.

First, the Proposed Rules do not require a qualified electric utility to include evaluation scenarios where load and generation are located at the same site. Instead, the Proposed Rules allow a qualified electric utility to assume 100 percent firm service in all circumstances, even when a large load customer is willing to contract for a more flexible arrangement. This is to the detriment of large load customers, who may otherwise be able to reduce or eliminate the need for incremental infrastructure investment, as well as for existing retail customers, who may in fact benefit if fixed costs of the existing system are recovered over more load. To avoid these potential outcomes, a qualified electric utility should be required to evaluate scenarios where service is provided in whole or in part by contracted generation. Enyo's proposed rule titled "Evaluation Requirements," included in its October 10, 2025 comments, sets forth language that would ensure that a qualified electric utility undertakes evaluations that are necessary and sufficient to meet S.B. 132's policy objectives.

Second, the Proposed Rules fail to establish certain duties and obligations for a qualified electric utility that are necessary to facilitate an efficient evaluation process, ensure transparency, and generally support large load customer interconnection consistent with S.B. 132's goals. To address these concerns, Enyo's proposed its rule titled "Obligations of a Qualified Electric Utility to Large Load Customers and Large-Scale Generation Providers." The duties and obligations set forth in Enyo's proposed rule ensure that there is transparency in service requests; that evaluations used to determine potential upgrades and costs allocable to large load customers consider the specific needs of each large load customer; that large load customers and large-scale

generation providers have access to information developed by a qualified electric utility in a timely manner, particularly when such information is required for inclusion in an application for approval of a large load contract; to ensure that evaluation costs are determined and assessed based on actual costs to a qualified electric utility; and to ensure that only commercially reasonable security and credit demonstration requirements are imposed again based on the specific circumstances of the service requested. Each of these are critical elements to ensure commercially feasible costs and timelines.

III. Conclusion

For the reasons stated herein, in Enyo's previously submitted comments incorporated by reference, and as set forth in NRG/Tract's December 15, 2025 comments on the Proposed Rules, Enyo continues to respectfully request that the Commission revise the Proposed Rules to address the issues identified. As drafted, the Proposed Rules fall short of striking an appropriate balance of the interests of large load customers, qualified electric utilities, large-scale generation providers, and existing retail customers.

Dated this 15th day of December, 2025.

Respectfully submitted,

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Certificate of Service
Docket No. 25-R318-01

I hereby certify that a true and correct copy of the foregoing was served by email this 15th day of December 2025 on the following:

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