

September 19, 2024

***VIA ELECTRONIC FILING***

Public Service Commission of Utah  
Heber M. Wells Building, 4<sup>th</sup> Floor  
160 East 300 South  
Salt Lake City, UT 84114

Attn: Gary Widerburg  
Commission Secretary

**RE: Proposed Changes to Schedule Nos. 70 and 72, Renewable Energy Rider and Renewable Energy Rider Bulk Purchase  
Docket No. 24-035-T08**

Enclosed for electronic filing are the proposed tariff sheets associated with Tariff P.S.C.U. No. 51 of PacifiCorp, d.b.a. Rocky Mountain Power (the “Company”), applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule. The Company respectfully requests an effective date of November 1, 2024 for these changes.

First Revision of Sheet No. 70.4	Schedule 70	Renewable Energy Rider
First Revision of Sheet No. 72.4	Schedule 72	Renewable Energy Rider Bulk Purchase

The purpose of this filing is to propose changes to the Blue Sky Program (“Program”) administered through Electric Service Schedule Nos. 70 and 72, specifically to clarify that the Company does not need to meet Green-e® eligibility and program certification for Renewable Energy Credits (“RECs”) procured to meet its voluntary products served under Schedules 70 and 72. Proposed changes to the Schedules 70 and 72 are included as Exhibit A.

**DISCUSSION**

Due to recent changes implemented by the Center for Resource Solutions (“CRS”), the Green-e Western Electricity Coordinating Council (“WECC”) market is frozen. As a result, the Company needs flexibility to explore additional options to meet its obligations to serve customers with a quality REC based product. Compliance with the new CRS policy would materially increase participant costs due to uncertainty in the market and may result in a scarcity of qualifying RECs in the WECC region.

Since the inception of the Blue Sky portfolio options, the Company has not purchased RECs from Company-owned resources and sourced RECs solely from WECC resources, and all RECs have been retired in the Western Renewable Energy Generation Information System. The Company

intends to continue this procurement strategy for its portfolio products, but proposes to remove language related to Green-e certification from Schedules 70 and 72 to enable flexibility to control whether the Blue Sky program continues to be Green-e certified.

On August 23, 2024, the Company filed Advice No. 24-015 with the Oregon Public Utilities Commission (“OPUC”), with a similar request to remove the reference to Green-e certification from the Oregon Blue Sky Tariff Schedule 272. Other utilities are also making similar requests to remove Green-e requirements as a result of the recent changes implemented by the CRS. For example, on May 29, 2024, Portland General Electric Company (“PGE”) filed Advice No. 24-11 with the OPUC requesting to remove the reference to Green-e certification for certain tariff schedules. The OPUC approved PGE’s filing at a Public Meeting held July 9, 2024. The Company requests the Commission similarly approve and confirm that PacifiCorp is not required to meet or receive Green-e program certification for RECs procured under Schedules 70 and 72. Notwithstanding the proposed removal of Green-e language, the Company will continue to meet many of the hallmark best practices that are part of Green-e certification.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By E-mail (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
[michael.snow@pacificorp.com](mailto:michael.snow@pacificorp.com)

By regular mail: Data Request Response Center  
PacifiCorp  
825 NE Multnomah St., Suite 2000  
Portland, OR 97232

Informal inquiries regarding this matter may be directed to me at (801) 220-4214.

Sincerely,



Michael S. Snow  
Manager, Regulatory Affairs

Enclosures

**CERTIFICATE OF SERVICE**

Docket No. 24-035-T08

I hereby certify that on September 19, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

Michele Beck [mbeck@utah.gov](mailto:mbeck@utah.gov)  
[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

[dpudatarequest@utah.gov](mailto:dpudatarequest@utah.gov)

**Assistant Attorney General**

Patricia Schmid [pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
Robert Moore [rmoore@agutah.gov](mailto:rmoore@agutah.gov)  
Patrick Grecu [pgrecu@agutah.gov](mailto:pgrecu@agutah.gov)

**Rocky Mountain Power**

Data Request Response Center [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)  
Jana Saba [jana.saba@pacificorp.com](mailto:jana.saba@pacificorp.com)  
[utahdockets@pacificorp.com](mailto:utahdockets@pacificorp.com)  
Michael Snow [Michael.snow@pacificorp.com](mailto:Michael.snow@pacificorp.com)

  
\_\_\_\_\_  
Carrie Meyer  
Adviser, Regulatory Operations

EXHIBIT A

PROPOSED TARIFF SHEETS

**ELECTRIC SERVICE SCHEDULE NO. 70 - Continued**

**SPECIAL CONDITIONS:**

1. Customers may apply for or terminate from this Schedule anytime during the year.
2. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
3. The Company will purchase Renewable Energy within two years of a Customer's purchase.
4. To ensure that all costs and Renewable Energy purchases of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability for all funds collected and will debit the regulatory liability as funds are spent. The Company will apply the interest rate identified in Electric Schedule No. 300, Sheet No. 9R4 to the balances in the regulatory liability account. The Company will endeavor to match spending to collection within each calendar year.
5. Beginning January 1, 2009, all RECs purchased are expected to be registered with the Western Renewable Energy Generation Information System (WREGIS) or as otherwise approved by the Public Service Commission of Utah given market availability.
6. The Company may market the program using campaigns that contain promotional elements as defined in Rule R746-404-2 of the Public Service Commission of Utah, including providing promotional gifts (e.g. water bottles, reusable grocery bags, donations to partnering nonprofit organizations) valued at less than \$25.00. All promotional program offerings must comply with the standards set forth in R746-404-3. Annual expenditures on promotional gifts shall not exceed \$10,000 in a calendar year.

**ELECTRIC SERVICE REGULATIONS:** Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

---

**ELECTRIC SERVICE SCHEDULE NO. 72 – Continued**

**QUALIFYING INITIATIVES (continued)**

Company's service territories. The Company will also be given the opportunity to purchase additional RECs off the project.

5. Qualifying Initiatives are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

**SPECIAL CONDITIONS**

1. Customers may apply for or terminate from this Schedule anytime during the year.
2. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
3. The Company will purchase Renewable Energy within two years of a Customer's purchase.
4. To ensure that all costs and Renewable Energy purchases of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability for all funds collected and will debit the regulatory liability as funds are spent. The company will apply the interest rate identified in Electric Service Schedule No. 300, Sheet No. 9R4 to the balances in the regulatory liability account. The Company will endeavor to match spending to collection within each calendar year.
5. Beginning January 1, 2009, all RECs purchased are expected to be registered with the Western Renewable Energy Generation Information System (WREGIS) or as otherwise approved by the Public Service Commission of Utah given market availability.

**ELECTRIC SERVICE REGULATIONS:** Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

**ELECTRIC SERVICE SCHEDULE NO. 70 - Continued**

**SPECIAL CONDITIONS:**

1. Customers may apply for or terminate from this Schedule anytime during the year.
2. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
3. The Company will purchase Renewable Energy within two years of a Customer's purchase.
4. To ensure that all costs and Renewable Energy purchases of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability for all funds collected and will debit the regulatory liability as funds are spent. The Company will apply the interest rate identified in Electric Schedule No. 300, Sheet No. 9R4 to the balances in the regulatory liability account. The Company will endeavor to match spending to collection within each calendar year.
5. ~~Beginning February 1, 2008, all RECs purchased under the program must conform with Green-e Energy national standards and be Green-e certified or Green-e certifiable.~~ Beginning January 1, 2009, all RECs purchased are expected to be registered with the Western Renewable Energy Generation Information System (WREGIS) or as otherwise approved by the Public Service Commission of Utah given market availability.
6. The Company may market the program using campaigns that contain promotional elements as defined in Rule R746-404-2 of the Public Service Commission of Utah, including providing promotional gifts (e.g. water bottles, reusable grocery bags, donations to partnering nonprofit organizations) valued at less than \$25.00. All promotional program offerings must comply with the standards set forth in R746-404-3. Annual expenditures on promotional gifts shall not exceed \$10,000 in a calendar year.

**ELECTRIC SERVICE REGULATIONS:** Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

---

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 24-035-  
T08--20-035-04

**FILED:** ~~September 1930, 2024~~ January 13, 2021

**EFFECTIVE:** November 1, 2024 ~~January 1, 2021~~

**ELECTRIC SERVICE SCHEDULE NO. 72 – Continued**

**QUALIFYING INITIATIVES** (continued)

Company's service territories. The Company will also be given the opportunity to purchase additional RECs off the project.

5. Qualifying Initiatives are not considered for purposes of any Renewable Portfolio Standard requirements. Renewable Energy generated in response to any federal or state statutory requirement to construct or contract for the Renewable Energy is not eligible.

**SPECIAL CONDITIONS**

1. Customers may apply for or terminate from this Schedule anytime during the year.
2. The Company may not accept enrollments for accounts that have a time-payment agreement in effect, or have received two or more disconnect notices, or have been disconnected within the last 12 months.
3. The Company will purchase Renewable Energy within two years of a Customer's purchase.
4. To ensure that all costs and Renewable Energy purchases of this program are isolated to the participants of this program, all funds collected under this program will be separately identified and tracked. On the effective date of this Schedule, the Company will establish a regulatory liability for all funds collected and will debit the regulatory liability as funds are spent. The company will apply the interest rate identified in Electric Service Schedule No. 300, Sheet No. 9R4 to the balances in the regulatory liability account. The Company will endeavor to match spending to collection within each calendar year.
5. ~~Beginning February 1, 2008, all RECs purchased under the program must conform with Green-e Energy national standards and be Green-e certified or Green-e certifiable.~~ Beginning January 1, 2009, all RECs purchased are expected to be registered with the Western Renewable Energy Generation Information System (WREGIS) or as otherwise approved by the Public Service Commission of Utah given market availability.

**ELECTRIC SERVICE REGULATIONS:** Service under this Schedule will be in accordance with the terms of the Electric Service Agreement between the Customer and the Company. The Electric Service Regulations of the Company on file with and approved by the Public Service Commission of the State of Utah, including future applicable amendments, will be considered as forming a part of and incorporated in said Agreement.

---

Issued by authority of Report and Order of the Public Service Commission of Utah in Docket No. 24-035-T08-20-035-04

**FILED:** ~~September 13, 2024~~ January 13, 2021

**EFFECTIVE:** ~~November 1, 2024~~ January 1, 2021