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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

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In the Matter of the Application of Rocky Mountain Power to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act	<b>Docket No. 25-035-06</b>
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**DIRECT TESTIMONY OF**

**JEFF SILVESTRINI**

**On Behalf of the**

**Community Renewable Energy Agency**

**July 18, 2025**

**DIRECT TESTIMONY OF JEFF SILVESTRINI**

**Introduction**

**Q. Please state your name and business address.**

A. My name is Jeff Silvestrini. My business address is 1330 East Chambers Avenue, Millcreek, Utah 84106.

**Q. By whom are you employed and in what capacity?**

A. I am the Mayor of Millcreek. Millcreek, which was incorporated in December of 2016, is home to more than 63,000 residents and is the 12th largest Utah city by population.

**Q. On whose behalf are you testifying in this proceeding?**

A. I'm testifying on behalf of the Community Renewable Energy Agency ("Agency"). Millcreek is an Anchor Member of the Agency and I am Millcreek's representative on the Community Renewable Energy Board ("Board").

**Q. Please describe your professional experience and qualifications?**

A. I have a bachelor's degree in history from the University of Michigan and a law degree from the University of Utah. I practiced law in Salt Lake City for 37 years and served as a volunteer on the Mount Olympus and Township councils prior to being elected Mayor.

I was elected as the first Mayor of Millcreek when it incorporated in 2016 and am currently serving my third term in that position. I also serve or have served on various Boards and Commissions, including the Central Wasatch Commission, the Salt Lake County Council of Governments, the Salt Lake County Criminal

24 Justice Advisory Council, the St. Mark's Hospital Board of Trustees, Unified Fire  
25 Authority, Unified Fire Service Area, Unified Police Department, Utah League of  
26 Cities and Towns, Utah Venture Outdoors, Inc., Wasatch Front Regional Council,  
27 and Wasatch Front Regional Council Active Transportation Committee.

28 **Q. Have you previously testified before this Commission?**

29 A. No.

30 **Q. Have you previously filed testimony before any other state utility regulatory**  
31 **commissions?**

32 A. No.

33 **Overview of Testimony**

34 **Q. What is the purpose of your testimony in this proceeding?**

35 A. My testimony focuses on certain aspects of the formation of the Agency, the  
36 decision by Millcreek to join the Agency and seek to participate in the Program,  
37 and Millcreek's role in Agency administration.

38 **Millcreek's Involvement in the Agency**

39 **Q. Is Millcreek a member of the Agency?**

40 A. Yes. After passage of the Community Renewable Energy Act ("Act") in 2019,  
41 Millcreek passed a resolution stating its goal of achieving an amount equivalent to  
42 100% of the annual electric energy supply for participating customers from a  
43 renewable energy resource by 2030. Millcreek subsequently joined the Agency as  
44 an Anchor Community in 2021 by executing the Interlocal Cooperation Agreement

45 Among Public Entities Regarding the Community Renewable Energy Program  
46 (“Governance Agreement”).<sup>1</sup>

47 **Q. What is an Anchor Community?**

48 A. After passage of the Act, the communities that were interested in participating in  
49 the Community Renewable Energy Program (“Program”) met to discuss the  
50 formation of the interlocal entity that would ultimately become the Agency. It was  
51 agreed that creating the Program would take a certain amount of time and money  
52 and that the communities would need to commit taxpayer resources to this effort.  
53 As was to be expected, not all communities had the same political calculations and  
54 levels of commitment to the Program. It was determined that, in order to generate  
55 the greatest participation among the eligible communities, certain communities  
56 would need to be “first movers” that would take on greater initial commitments and  
57 responsibilities than others. This concept was included in the Governance  
58 Agreement in the form of the “Anchor Communities.”

59 Anchor Communities agreed to make financial commitments earlier than  
60 and exceeding those of other communities. As noted in the Governance  
61 Agreement, the Agency would not be formed until at least five communities  
62 committed to become Anchor Communities. Seven communities agreed to become  
63 Anchor Communities. In addition to Millcreek, the Anchor Communities are  
64 Grand County, Summit County, Town of Castle Valley, Moab City, Park City, and  
65 Salt Lake City.

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<sup>1</sup> A copy of the Governance Agreement is included as Attachment I to RMP’s Application in this docket.

66 **Q. Why did Millcreek elect to join the Agency and to become an Anchor**  
67 **Community?**

68 A. Millcreek supports development of the Program because we believe it will provide  
69 an affordable way for our residents and businesses to support clean energy at grid  
70 scale. Millcreek determined that the Program was superior to other existing clean  
71 energy programs offered by Rocky Mountain Power (“RMP”) to its customers. In  
72 addition, there is widespread support for the Program among Millcreek residents.  
73 Millcreek residents advocated for the city to join the Program and even donated  
74 funds to support the City’s participation as an Anchor Community.

75 **Q. Does Millcreek play any other role in the administration of the Agency?**

76 A. Yes. Millcreek acts as the Treasurer for the Agency. As Treasurer, Millcreek  
77 receives payments from member communities, hosts competitive solicitations for  
78 administrative services required by the Agency, pays invoices for services  
79 performed for the Agency and also those associated with the cost of consultants  
80 hired by the Office of Consumer Services and the Division of Public Utilities.

81 Millcreek also hosts meetings of the Board at Millcreek City Hall. The  
82 Agency requires a space in which to conduct its public business and Millcreek is  
83 happy to provide its facilities for this purpose.

84 **Q. You mentioned that Millcreek determined that the Program was superior to**  
85 **other RMP clean energy programs. Which programs are you referring to?**

86 A. RMP offers the Blue Sky program and the Subscriber Solar program to its Utah  
87 customers.

88           The Blue Sky program allows customers to elect to purchase blocks of 100  
89       kWh each. Residential customers may purchase these blocks for \$1.95 each. High  
90       volume commercial and industrial customers may purchase blocks for  
91       approximately 70 cents per block. RMP uses Blue Sky revenues to help fund the  
92       installation of new customer-sited renewable energy projects. Blue Sky projects  
93       are limited to 10 megawatts or smaller and only nonresidential customers are  
94       eligible to utilize program grants to install renewable projects. Blue Sky is certainly  
95       a useful program. The solar array installed at Millcreek City Hall was partially  
96       funded by a Blue Sky grant. It does not, however, provide an avenue for Millcreek  
97       residents and businesses to support new grid-scale clean energy projects.

98           The Subscriber Solar program allows RMP's Utah customers to subscribe  
99       to the output of a 20 MW solar project called Pavant Solar III in Millard County,  
100      Utah, that came online in 2016. Customers can subscribe to 200 kWh blocks or full  
101      coverage. The program has enjoyed mostly full subscription since its inception,  
102      meaning that it has often been closed to new customers. Recently, 100 blocks were  
103      listed as available on the program website. This availability would support only 31  
104      new subscribers using 637 kWh per month. RMP has previously sought to expand  
105      the subscriber solar program to include additional solar projects, but none have been  
106      added and there are currently no plans to further expand the program. As such, the  
107      Subscriber Solar program also does not provide an avenue for Millcreek residents  
108      and businesses to support new grid-scale clean energy projects.

109 **Q. Please explain why you believe the Program is beneficial to Millcreek**  
110 **residents.**

111 A. I believe the Program will provide an affordable way for our residents and  
112 businesses to supplement their current energy mix with additional clean energy, up  
113 to net-100% by 2030. Because RMP's energy mix already includes some clean  
114 energy resources for all of its customers and RMP plans to add more, the Program  
115 doesn't need to bear the cost of adding new clean energy to match every kilowatt-  
116 hour consumed by our participating customers over the course of a year. Instead,  
117 the Program will seek to complement the percentage of RMP's energy mix that is  
118 already coming from clean energy sources. So if RMP's energy mix in 2030 is 50%  
119 clean, then the program's goal will be to match 50% of participating customers'  
120 annual consumption. Recognizing the clean energy our customers already pay for  
121 helps keep the cost of the Program down.

122 **Q. Has the Board taken a position as to what the Program costs should be for**  
123 **consumers?**

124 A. Actual costs of the Program can't be known until the Program is approved and clean  
125 resources are acquired. The Board has, however, taken a position that would ensure  
126 that the Program does not unduly burden participating customers.

127 The Board adopted a position that the initial Program rate should add no  
128 more than between \$3 and \$4 per month to the average residential bill. At this  
129 level, and based on forecasts of participation rates, the Board estimates that the  
130 program could raise roughly \$14 million over its first full year of operation and this  
131 would be sufficient to cover the first year of administrative costs for RMP and the

132 Agency, and to raise a reserve fund sufficient to cover the net cost of a solar project  
133 of somewhere between 60 MW and 200 MW in size, depending on how projected  
134 costs and benefits are quantified. I believe Millcreek residents will be excited to  
135 participate in the Program, as it has the potential to deliver new utility-scale clean  
136 energy at an affordable price and should also lower air pollution along the Wasatch  
137 front.

138 **Q. How will the Program affect Millcreek's low-income residents?**

139 A. In addition to the Board's position on the initial Program rate discussed above, the  
140 Board has also pursued mechanisms that will allow low-income residents within  
141 the participating communities to participate in the Program. To that end, the Board  
142 has supported an increase in the existing bill credit to enable low-income customers  
143 to participate in the Program and a waiver of any termination fee if low-income  
144 customers must leave the Program. These approaches are more fully discussed in  
145 the testimony of Daniel Dugan and Christopher Thomas on behalf of the Agency.

146 **Q. Do you have any recommendations for the Commission?**

147 A. I recommend that the Commission implement the Program, which will allow the  
148 Agency to acquire clean energy resources on behalf of the participating customers  
149 in the communities.

150 **Q. Does this conclude your direct testimony?**

151 A. Yes, it does.