ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W. North Temple, Suite 330
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August 7, 2026

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

RE: Docket No. 25-035-06 – Application of Rocky Mountain Power to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act

Pursuant to Utah Admin. Code R746-1-109, Rocky Mountain Power, a division of PacifiCorp ("Company" or "Rocky Mountain Power"), requests the Commission relieve the Company of the obligation to comply with the requirement under R746-314-201(2)(b), that a participating customer that moves or changes its service address from one location to another within the program boundary shall automatically continue to be a participating customer at the new location.

Informal questions may be directed to Max Backlund at max.backlund@pacificorp.com.

Sincerely,

Jana Saba
Director, Regulatory Affairs

Service List: Docket No. 25-035-06

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PacifiCorp Attorney

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act	Docket No. 25-035-06 **Motion For Waiver of Commission Rule R746-314-201(2)(b)**

Pursuant to Utah Admin. Code R746-1-109, Rocky Mountain Power, a division of PacifiCorp ("Company" or "Rocky Mountain Power"), requests the Commission relieve the Company of the obligation to comply with the requirement under R746-314-201(2)(b), that a participating customer that moves or changes its service address from one location to another within the program boundary shall automatically continue to be a participating customer at the new location.

BACKGROUND

In 2019, Utah enacted the Utah Community Renewable Energy Act ("Act"),[1] and the Commission subsequently adopted rules to implement the law in 2020.[2]

The Company filed its initial application to implement the Act in 2025 ("Initial Application"), and Attachment G presented a draft tariff, Electric Service Schedule No. 100 – Community Clean Energy Program – Optional ("Schedule 100"). Schedule 100 contained the following provision consistent with R746-314-201(2)(b):

[1] 2019 UT Laws Ch. 471—House Bill 411 (eff. May 14, 2019).
[2] R746-314 (Jan. 8, 2020).

> A Participating Customer that moves or changes its service address from one location within the boundaries of a Participating Community to another location within the boundaries of any Participating Community shall continue to be a Participating Customer at the new location. No notices shall be provided and Termination Fees would apply.

The Commission approved the Company's request to implement the Program in early 2026.[3]

REQUEST FOR WAIVER OF UTAH ADMIN. CODE § R746-314-201(2)(b)

As the Company has worked with the Community Renewable Energy Agency ("Agency") to implement the Program, it has determined that automatic transfer of a customer's participation status in the Program that is consistent with R746-314-201(2)(b) is not feasible given the constraints of the Company's information technology ("IT") and billing systems. This constraint exists both when a participating customer moves from one participating community to another participating community and when the customer moves within the same participating community. Compliance with this provision would require the Company to either implement a cumbersome manual process that would be administratively burdensome and subject to human error, or otherwise pay for costly changes to its IT and billing systems. In addition, potential changes to the Company's IT and billing systems to add the required functionality could potentially impact the Company's connection/disconnection processes used by non-participating customers in Utah and other states. Thus, compliance with R746-314-201(2)(b) would impose an undue hardship on the Company that outweighs the benefits of that rule.

Instead, the Company proposes to terminate a Participating Customer's participation in the Program if the customer moves from a participating community to another participating community, including moves within the same participating community. Under this proposal, the customer would not be subject to a termination fee and would receive a noticing period as described in Utah Code Ann. § 54-17-905(2)(b)(ii). The customer could still elect to participate

[3] Order Approving Program with Modifications, Docket No. 25-035-06 (Mar. 4, 2026).

in the Program by not opting out during this noticing period. If this waiver request is approved, the Company will file a compliance filing to update the current tariff language.

Accordingly, the Company respectfully requests this Commission issue an Order suspending the Company's obligation to comply with the requirements of R746-314-201(2)(b), and allow the Company to terminate the Program participation of a participating customer who moves outside the boundaries of one participating community into the boundaries of another participating community or moves within the boundaries of a participating community.

Respectfully submitted August 7, 2026.



Zachary Rogala
Attorney

Rocky Mountain Power

CERTIFICATE OF SERVICE

Docket No. 25-035-06

I hereby certify that on August 7, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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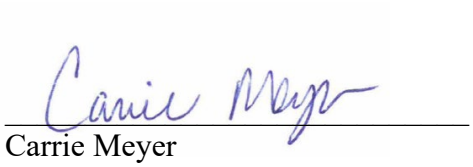
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