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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Implement Community Clean Energy Program Authorized by the Community Clean Energy Act	Docket No. 25-035-06
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**COMMENTS IN SUPPORT OF ROCKY MOUNTAIN POWER’S MOTION FOR
WAIVER OF COMMISSION RULE R746-314-201(2)(b)**

The Community Renewable Energy Agency (“Agency”) hereby submits the following comments in support of the Motion for Waiver of Commission Rule R746-314-201(2)(b) (“Motion”) filed by Rocky Mountain Power (“RMP” or “Company”).

The Agency and the Company have worked together for years to design and develop the Community Clean Energy Program (“Program”). Since the Commission issued the Order Approving Program With Modifications (“Order”) on March 4, 2026, the Agency and the Company have worked in concert to address numerous issues regarding tariff design and Program implementation. In connection with this work, the Company and the Agency have discussed Program implementation concerns relating to Commission Rule R746-314-201(2)(b), which states that “[a] participating customer that moves or changes its service address from one location within the program boundaries to another location within the program boundaries shall continue to be a

participating customer at the new location.” This provision aligns with the Agency’s preference that a Program customer should remain a Program customer until the customer either opts out of the Program or moves to a location outside of the Program boundaries. Unfortunately, it seems that the Company’s billing software is not able to reliably implement this provision.

The Agency has learned that, when a Program customer moves from one service location within a participating community to another service location within the same or another participating community, the Company’s billing software is not able to automatically track that customer to the new location for Program enrollment purposes. The Agency further understands that, while the billing software could be updated to improve this capability, such updates would both be very costly and insufficient to address all scenarios in which a customer terminates service at one location within the Program boundaries and subsequently initiates service at another location within the Program boundaries.

While the Agency would prefer that a Program customer that moves to a new location within the Program boundaries would remain a Program customer without new notices being sent to that customer, it appears that this outcome is not feasible for the reasons set forth herein. The Agency understands that, if the Motion is granted, a customer described in R746-314-201(2)(b) would receive new notices when taking service at the new location and would have an opportunity to opt out within the time frame contemplated in the Rules. The Agency further understands that the customer would not be subject to a termination fee when Program participation is terminated as a result of the change in service locations. As a practical matter, these outcomes are superior to one in which the Company’s billing software undergoes an expensive modification that cannot ensure that a customer’s Program participation will follow the customer from one location to

another within the Program boundaries. As such, the Agency supports the Motion to deviate from R746-314-201(2)(b).

DATED this 25th day of August 2026

Respectfully submitted,



/s/

Phillip J. Russell

JAMES DODGE RUSSELL & STEPHENS, P.C.

*Attorney for the Community Renewable
Energy Agency*

Certificate of Service
Docket No. 25-035-06

I hereby certify that a true and correct copy of the foregoing Petition to Intervene was served by email this 25th day of August 2026 on the following:

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