

September 18, 2025

Attn: Utah Public Service Commission

Docket No. 25-035-52

Healthy Environment Alliance of Utah (HEAL Utah)

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HEAL Utah submits these comments in response to the Commission's September 10, 2025, Notice of Filing and Comment Period.

HEAL Utah, on behalf of our more than 20,000 members and supporters, supports an investigation of the issues raised in Utah Clean Energy's Request for Expedited Investigatory Docket and Agency Action (UCE Request). We believe this proceeding is critical to ensuring Utahns capture the full benefits of a clean energy transition.

Federal tax credits that substantially reduce costs for wind and solar are set to expire soon. Capturing these incentives is a time-limited opportunity that will directly benefit Utah ratepayers while reducing market price risks as a whole. PacifiCorp's own 2025 IRP demonstrates a clear need for at least 1.4 GW of new wind and solar in the next four years, within the Action Plan window. The choice is not whether these resources will be built, but whether they will be built in time to maximize savings. Moving

procurement forward now could save PacifiCorp customers between \$2.5 and \$10 billion—possibly more—compared to delaying action until after tax credits expire.

These savings are especially critical for our households already struggling with rising electricity prices. When a utility has a clear opportunity to lower costs and yet does not act, it fails to serve the public interest, even as the company continues to request rate increases.

Accelerating renewable procurement also delivers important health benefits. Families in rural and urban communities alike will benefit from more stable bills and fewer pollution-related health burdens. Cutting emissions by rapidly deploying renewable electricity generation means cleaner air and fewer cases of asthma, heart disease, and other illnesses, improving quality of life and lowering health costs across Utah.

Finally, it is worth noting that developers have already invested tens of millions of dollars in Utah over the past decade. These projects are poised to move forward quickly, providing jobs, economic activity, and clean energy resources for Utah communities. Neighboring states are already racing ahead to secure these federal incentives. If Utah delays, we risk missing the window for billions in savings, while becoming more reliant on imports from surrounding states.

For all of these reasons, HEAL Utah urges the Commission to promptly investigate the issues raised in the UCE Request and to direct PacifiCorp to accelerate renewable procurement in the interest of ratepayers, public health, and Utah's energy independence.

Respectfully submitted,

HEAL Utah

Lexi Tuddenham

A handwritten signature in dark ink, appearing to read 'Lexi Tuddenham', with a stylized, flowing script.

Executive Director