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Before the Public Service Commission of Utah

Utah Clean Energy’s Request for Expedited Investigatory Docket and Agency Action	Docket No. 25-035-52 SUPPLEMENTAL COMMENT OF UTAH CLEAN ENERGY TO CLARIFY THE RECORD
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Utah Clean Energy (“UCE”) hereby submits a supplemental comment to clarify the record in UCE’s Request for Expedited Investigatory Docket and Agency Action (“UCE’s Request”), filed on August 29, 2025. Although the Utah Public Service Commission (the “Commission”) issued a Notice of Filing and Comment Period, requesting comments by September 19, 2025, UCE respectfully requests the Commission accept this limited supplemental comment to clarify the record.

PacifiCorp (“the Company”) filed a comment on September 19, 2025. The Company’s comment implied that the 2025 IRP contained a sensitivity study relevant to UCE’s Request. The Company stated the following in their comment:¹

“Additionally, the 2025 IRP contained a sensitivity assuming the end of tax subsidies for renewable resources. The result of that sensitivity was the removal of 3,782 MW of wind, 3,366 MW of solar, and 2,382 MW of storage and the addition of 627 MW of gas peaking and 311 MW of demand-side management. This shows that since the Company does not need new resources to serve Utah customers, rapid procurement of resources, even if they are tax advantaged, will impose unnecessary costs on Utah customers.”

¹ Rocky Mountain Power’s Comments filed September 19, 2025, in Docket No. 25-035-52

However, in Chapter 9 of the 2025 IRP, pg 281, this sensitivity is described as follows²:

“The low IRA/IIJA sensitivity evaluates what selections would be made if **no resources were ever eligible for IRA or IIJA credits. The purpose of this study is to identify the impact if tax credits were not available to any new resources.”**

Therefore, the sensitivity in the 2025 IRP cited by the Company is *not* germane to the present policy environment where tax credits *are available* for projects for a limited time. Furthermore, on several occasions UCE requested an IRP modeling sensitivity to evaluate the early phase out of tax credits,³ and the Company’s Draft IRP indicated that the Company would run such a scenario,⁴ but that sensitivity study was either never run or never shared by the Company. Therefore, the 2025 IRP does not explore the actions needed for the present policy situation. The only way to determine the potential ratepayer savings from tax-advantaged projects would be to create an Expedited RFP or Confidential Open Call for Projects, as UCE requested in its comments.⁵

UCE respectfully requests that the Commission accept this limited supplemental comment to clarify the record that the 2025 IRP did not contain a relevant sensitivity study for the present policy environment, where there is a time-limited opportunity to procure tax-advantaged resources.

Respectfully submitted this 30th day of September, 2025.

By: /s/ Lauren R. Barros

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² 2025 IRP, Chapter 9, page 281, filed March 31, 2025, in Docket No. 25-035-22

³ January 22, 2025 Public Input Meeting Transcript, pages 68-80

https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025_IRP_Public_Input_Meeting_Transcript_January_22_2025.pdf and Stakeholder Feedback Letter #63 https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025-irp-comments/2025.063_UCE_2-10-2025_with_response.pdf

⁴ 2025 IRP Draft, Chapter 8, page 208, filed December 31, 2024, in Docket No. 23-035-10

⁵ Comments of Utah Clean Energy filed September 19, 2025, in Docket No. 25-035-52

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CERTIFICATE OF SERVICE Docket No. 25-035-52

I hereby certify that a true and correct copy of the foregoing was served by email this 1st day of October 2025, on the following:

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