

September 1, 2026

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Secretary

**RE: Docket No. 26-035-T09, Rocky Mountain Power's Compliance Tariff Filing to
Implement Electric Service Schedule No. 100, Community Clean Energy Program –
Optional Opt-Out Program**
Rocky Mountain Power Reply Comments

In accordance with the Notice of Filing and Comment Period issued by the Public Service Commission of Utah ("Commission") on August 11, 2026, PacifiCorp d/b/a Rocky Mountain Power ("Rocky Mountain Power" or "RMP") responds to comments submitted by the Division of Public Utilities ("DPU") and the Community Renewable Energy Agency ("Agency") regarding Rocky Mountain Power's proposed revisions to Electric Service Schedule No. 100 ("Schedule 100").

On March 4, 2026, the Public Service Commission of Utah ("Commission") issued its Order Approving Program with Modifications ("Order") approving Rocky Mountain Power's ("RMP") Community Clean Energy Program ("Program"). On August 7, 2026, RMP filed a revised Schedule 100 for Commission approval reflecting the directives in the Commission Order, as well as changes that have been identified by the Company as it has worked with the Agency to implement the Program.

The DPU and Agency filed comments on August 25, 2026. The DPU recommends Commission approval of the tariff as filed and suggests that the program costs by component be included in the Program reporting. RMP appreciates the DPU's review of Schedule 100 and agrees that the Program costs by component should be included in the Program's reporting. The Commission recently initiated a docket to establish the reporting requirements for the Program in Docket No. 26-035-38, and the Company will ensure its proposed reporting requirement template includes adequate detail by component.

The Agency filed comments in support of adoption of Schedule 100 as submitted by the Company but propose modifications to add rates and termination fees for Electric Service Schedule No. 32 – Service From Clean Energy Facilities ("Schedule 32") and Electric Service Schedule No. 34 – Clean Energy Purchases for Qualified Customers – 5,000 kW and Over 34 ("Schedule 34").

Although the Agency argues that Schedules 32 and 34 should be added to Schedule 100 and be eligible to participate in the Program, they emphasize that additional discussion around this issue should not delay approval of Schedule 100 or implementation of the Program.

I. Schedule 32

As summarized by the Agency, Schedule 32 is available to customers taking service on Schedules 6, 8, and 9 that desire to receive all or part of their electricity from a clean energy resource. Schedule 32 customers receive energy both from one or more clean energy resources procured by RMP and from RMP for all energy not served by the clean energy resource. The customer pays all costs incurred by RMP in connection with the clean energy resource as well as a facilities charge associated with the delivery of that energy. All energy delivered to the customer by RMP that is not supplied by the clean energy facility, referred to as Supplementary Energy, is billed pursuant to the pricing provisions of the customer's applicable general service schedule. For Schedule 32 customers located in a participating community, the Agency proposes that the non-residential Program rate of \$0.00609 per kWh be applied to the kWh of Supplementary Energy billed to the customer each month, consistent with how Schedule 31 customers will be billed for participation in the Program. The Agency also proposes that the termination fee for Schedule 32 be based on the general service schedule for which the customer is otherwise eligible and that Schedules 32 and 34 could be listed in the bottom row of the termination fee table in a revised Schedule 100.

The Company agrees with the Agency's suggested approach and has added Schedule 32 to the Schedule 100 tariff sheets that are attached to these reply comments.

II. Schedule 34

Schedule 34 is available to RMP customers with an aggregated annual peak load of 5 MW or more that desire to receive all or part of their electricity from a clean energy resource. Schedule 34 customers must pay (i) normal tariff rates, which may include rates set forth in a special contract, (ii) cost-based administrative fees, and (iii) an incremental charge for the Company to supply energy from the clean energy resource.

The Agency proposes that, for Schedule 34 customers, the non-residential Program charge be applied to the kWh of measured energy consumed by the customer less the kWh of energy produced by the customer's clean energy resources. However, the Agency notes that, unlike Schedule 32, the structure of Schedule 34 does not require segregation between the amount of energy supplied by clean energy resources and the energy supplied by RMP in excess of those resources each month. Rather, a true-up between projections and actuals is performed on an annual basis for Schedule 34 customers. The Agency suggests that any Schedule 34 customer that participates in the Program can determine the exact method of implementation based on the true-up mechanism in the Schedule 34 contract.

The Company currently has seven Schedule 34 customers – five that are located in an eligible community and two that are not located in an eligible community. The Company is concerned about how the Program rates would work with the Schedule 34 true-up mechanisms and questions

if this would require potential changes to existing contracts for a Schedule 34 customer that does not opt out. The Company requests that the Commission decline to require the Company to allow Schedule 34 customers to participate at this time until the issue can be further explored.

III. Tariff Filing

Accordingly, enclosed for filing are RMP's tariff sheets associated with Tariff P.S.C. No. 52, applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405 2(D), the Company states that the proposed tariff sheets do not constitute a violation of state law or Commission rule.

Original Sheet No. 100.3	Electric Service Schedule No. 100	Community Clean Energy Program – Optional Opt-Out Program Original
Original Sheet No. 100.4	Electric Service Schedule No. 100	Community Clean Energy Program – Optional Opt-Out Program Original
Original Sheet No. 100.7	Electric Service Schedule No. 100	Community Clean Energy Program – Optional Opt-Out Program Original

IV. Conclusion

The Company respectfully requests the Commission approve the proposed revisions to Schedule 100 as proposed on August 7, 2026 and modified in these reply comments.

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

Sincerely,



Jana Saba

Director, Regulatory Affairs

CERTIFICATE OF SERVICE

Docket No. 25-035-06/26-035-T09

I hereby certify that on September 1, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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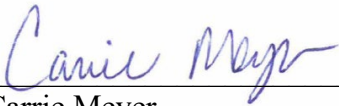
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ELECTRIC SERVICE SCHEDULE NO. 100 - Continued

Program Participation Credits for Low Income Customers: A monthly bill credit provided to customers who receive service from Rocky Mountain Power's Low Income Lifeline Program, Electric Service Schedule No. 3, and elect to participate in the Community Clean Energy Program as described in the Monthly Bill section.

Program Rates: The rates and fees charged to Participating Customers and Exiting Customers to recover all costs and expenses incurred by Rocky Mountain Power to implement and operate the Program in accordance with Utah Code Annotated § 54-17-904(4).

Tax identifier: An identifier used by Rocky Mountain Power to designate meters and accounts that are associated with specific municipal or county taxing districts.

Termination Fee: The fee, if any, assessed to and charged to an Exiting Customer to exit the Program.

MONTHLY BILL: In addition to the monthly charges contained in the Customer's applicable schedule, a Participating Customer's monthly bill shall have the following Program charges plus any applicable charges or adjustments set forth in this Schedule:

Residential Customer:

For Participating Customers on Rocky Mountain Power Schedules 1, 136, and 137:

Total Program Charge of \$4.00 per month, inclusive of a \$0.10 per month surcharge to fund Program Participation Credits for Low Income Customers.

For Participating Customers on Rocky Mountain Power Schedule 3 (Low Income Lifeline):

Total Program Charge of \$0.00 per month, consisting of:

Program Charge:	\$4.00 per month
Program Participation Credit for Low Income Customers:	(\$4.00) per month

Non-Residential Customer:

For Participating Customers on Rocky Mountain Power Schedules 6, 6A, 7, 8, 9A, 9, 10, 11, 12, 15, 23, 31, 32, 135, 136, and 137:

(continued)

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FILED: ~~September~~August 17, 2026
November 2, 2026

EFFECTIVE:

ELECTRIC SERVICE SCHEDULE NO. 100 - Continued

Non-Residential Customer (continued):

Program Charge:	0.6090¢ per kWh for all kWh
Surcharge to fund Program Participation	
Credits for Low Income Customers:	\$0.12 per month

*The rate for Schedules 7, 11, and 12 shall be applied to per Lamp monthly kWh.

**The rate for Schedules 31 and 32 shall be the same as the applicable general service schedule.

***The rate for Schedule 135 shall be applied to the Energy billed as described in Schedule 135, special condition 2.

****The rate for Schedules 136 and Schedule 137 shall be applied to the energy delivered by the Company to the customer.

PROGRAM FUNDING PRIORITIES: The revenues collected from the Program rates will be used to fund Program activities in the following order:

1. Program Start-up Costs
2. Administrative Cost & Administrative Reserve Fund
3. Low Income Program Fund
4. Clean Energy Resource Fund

LOW INCOME ASSISTANCE: Customers who receive service from Rocky Mountain Power's Low Income Lifeline Program, Electric Service Schedule No. 3 (Schedule 3), and elect to participate in the Community Clean Energy Program will receive a Program Participation Credit on their monthly bill in an amount equal to the monthly charge per customer for Residential Customers of this Schedule as described in the Monthly Bill section. The Program Participation Credit for Schedule 3 shall be zero if the monthly charge per customer for Residential Customers of this Schedule is less than zero. Termination fees for exiting the Program, if any, will be waived for Participating Customers receiving service under Schedule 3. Credits provided are funded through a surcharge paid by other Participating Customers and are subject to the availability of Program funds. The surcharge listed in the Monthly Bill section above is subject to change but will not be greater than \$0.70 per month.

OPTING OUT: The Community Clean Energy Program is an opt-out program. This means an Eligible Customer will be automatically enrolled in the Program and become a Participating Customer and subject to the rates and terms of this Schedule unless the Eligible Customer elects not to participate by giving notice to Rocky Mountain Power through an opt-out procedure as applicable to the Eligible Customer.

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ELECTRIC SERVICE SCHEDULE NO. 100 - Continued
TERMINATION FEE (continued):

Schedules (Residential)	One-Time Termination Fee
1 – Residential Customers	\$30
136 – Transition Program for Customer Generators (residential customers)	
137 – Net Billing Service (residential customers)	
3 – Low Income Lifeline Program Residential Service	\$0

Schedules (Non-Residential)	One-Time Termination Fee	Calculation Method, if based on kW
23 – General Service Distribution Voltage Small Customer 10 – Irrigation and Soil Drainage Pumping Power Service	\$30	
6 – General Service Distribution Voltage 6A – General Service Energy Time of Day Option 8 – Large General Service 1,000 kW and Over Distribution Voltage 9A – General Service High Voltage Energy Time of Day Option 9 – General Service High Voltage	\$6 per Avg kW	Avg kW is the average Facilities kW over the prior 12-month period
7 – Security Area Lighting 11 – Street Lighting Company Owned System 12 – Street Lighting Customer Owned System	\$0.15 per lamp	
15 – Outdoor Nighttime Lighting Service, Traffic and Other Signal System Service Customer-Owned System	\$0.96 per Avg kW	
31 – Partial Requirements for Service Large General Service 1000kW and Over <u>32 – Service From Clean Energy Facilities</u> 135 – Net Metering Service (non-residential customers) 136 – Transition Program for Customer Generators (non-residential customers) 137 – Net Billing Service (non-residential customers)		Calculation method for the applicable general service schedule

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Total Program Charge of \$0.00 per month, consisting of:

Program Charge:	\$4.00 per month
Program Participation Credit for Low Income Customers:	(\$4.00) per month

Non-Residential Customer:

For Participating Customers on Rocky Mountain Power Schedules 6, 6A, 7, 8, 9A, 9, 10, 11, 12, 15, 23, 31, 32, 135, 136, and 137:

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