



State of Utah

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Public Service Commission

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Commissioner

September 22, 2026

Via Email

Max Backlund
Manager of Regulatory Affairs
Rocky Mountain Power
1407 West North Temple, Suite 330
Salt Lake City, UT 84116
max.backlund@pacificorp.com

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*; and Docket No. 25-035-06, *Application of Rocky Mountain Power to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act*

Dear Mr. Backlund:

The Public Service Commission (PSC) has reviewed the August 7, 2026, filing ("Filing") submitted by Rocky Mountain Power (RMP) proposing the tariff to govern the Community Clean Energy Program (the "Program"), Electric Service Schedule No. 100. RMP's filing was made in compliance with the PSC's March 4, 2026, Order Approving the Program with Modifications (the "Order").¹ Schedule No. 100 ("Schedule 100") reflects an effective date of November 2, 2026, which is when RMP plans to send the first opt-out notice required by Utah Code § 54-17-905(1). The tariff included in the Filing incorporates amendments made since the original tariff submission on January 24, 2025, reflecting directives from the Order as well as changes identified by RMP and the Community Renewable Energy Agency (the "Agency").

¹ See *Application of Rocky Mountain Power to Implement Community Clean Energy Program Authorized by the Community Clean Energy Act*, Docket No. 25-035-06.

In the Filing, RMP states it added a new Program Funding Priorities (“Priorities”) section to specify how Program revenues will be used. This section is meant to satisfy the requirement in the Order that Schedule 100 disclose Program costs by component. RMP states it does not know the specific amounts that will be necessary to pay the Program start-up costs, as these costs have not been incurred yet. Similarly, RMP states it cannot know in advance how much Program revenue will be collected, meaning it cannot know when these funds will begin to be assigned to various reserve funds. The new Priorities section is RMP’s attempt at providing transparency to Program customers in the absence of specific and identifiable costs.

The PSC also reviewed the August 25, 2026, comments filed by the Agency. The Agency recommends approval of the proposed Schedule 100 but proposes certain modifications. The Agency states that Schedule 100 does not list monthly charges or termination fees that would apply to Schedule No. 32 (“Schedule 32”) or Schedule No. 34 (“Schedule 34”) customers, which could imply that these customers may not participate in the Program. The Agency believes these customers can participate in the Program and the \$0.00609/kWh charge (the “Program Rate”) for non-residential Program customers can be applied to Schedule 32 and Schedule 34 customers. For Schedule 32, the Agency proposes the Program Rate be applied to the kWh of Supplementary Energy billed to the customer each month.² For Schedule 34, the Agency proposes the Program Rate 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.³ Regarding termination charges, the Agency proposes that the Program termination fee for Schedules 32 and 34 be based on the general service schedule for which the customer is otherwise eligible.

The PSC also reviewed the August 25, 2026, comments filed by the Division of Public Utilities (DPU). DPU reviewed RMP’s proposed Schedule 100 changes and recommends its approval. DPU supports the various technical and definitional corrections made throughout the Filing. DPU also supports the major revisions made to the monthly bill section, which provide greater visibility of Program costs for both residential and non-residential customers. DPU supports RMP’s new Priorities section. DPU notes that the proposed Schedule 100 does not go into any detail beyond that, which seems to contradict the unbundling requirement of the Order.⁴ However, DPU agrees with RMP that these costs are unknown currently. As such, DPU supports RMP’s Priorities section but recommends these cost details be provided in later reports as they become available.

² Supplementary Energy is defined as all kWh delivered to the customer by RMP that is not supplied by a clean energy facility per Schedule No. 32 or 34.

³ This proposed methodology is necessary because Schedule No. 34 does not require segregation between the amount of energy supplied by clean energy resources and the Supplementary Energy to the customer each month.

⁴ See Order, p. 23.

Finally, the PSC reviewed the September 1, 2026, reply comments and revised tariff filed by RMP. RMP agrees with the Agency's suggested approach for Schedule 32 customers and has added Schedule 32 to its revised Schedule 100 tariff sheets included with the reply comments (Sheet Nos. 100.3, 100.4, and 100.7). RMP states that it has seven Schedule 34 customers, five of which are in a Program-eligible community. RMP is concerned about how implementing Program rates would work with Schedule 34 true-up mechanisms and questions whether this would require contract modifications for Schedule 34 customers who do not wish to opt out. RMP requests the PSC decline to require Schedule 34 customer Program participation until the issue can be further investigated.

We agree with the Agency's suggested approach for Schedule 32 customers. However, we share RMP's concerns regarding Schedule 34 customer Program participation. We invite recommendations on Schedule 34 Program participation after further exploration.

Based on the PSC's review of the Filing, the Agency's comments, DPU's comments, along with RMP's reply comments and revised tariff, the PSC approves Schedule No. 100 as filed by RMP with the revisions filed September 1, 2026 (the "Revised Schedule No. 100").

Based on the PSC's review of the Filing, the Agency's comments, DPU's comments and recommendation, and RMP's reply comments, the PSC approves the Revised Schedule No. 100, effective November 2, 2026.

Sincerely,

/s/ Gary L. Widerburg

PSC Secretary

DW#347156