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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Amendment to Application of Will-Power UT,
LLC for Approval of a Large Load Contract
Under R746-318-201, R746-318-601

Docket No. **26-2660-01**

**AMENDMENT TO LARGE-SCALE GENERATION PROVIDER'S
APPLICATION FOR A CLOSED PRIVATE GENERATION CONTRACT**

Will-Power UT, LLC (“Will-Power”), noticed its registration as a Large-Scale Generation Provider in Docket No. 25-2660-01 (“Original Filing”), currently pending with the Commission.

On March 24, 2026, in compliance with R746-318-201 and R746-318-601, Will-Power filed the closed private generation contract, the Power Purchase Agreement (the “PPA”), for approval with the Commission through its application for approval of a large load contract as reflected in this docket (“Application”). In its initial review, the Division of Public Utilities (“DPU”) requested additional information. As a result of this request, Will-Power withdrew the initial Application during the April 7, 2026 pre-hearing conference and Will-Power now amends its Application through the present Amendment to Large-Scale Generation Provider’s Application for a Closed Private Generation Contract, providing all requested materials presently in Will-Power’s possession at this early stage of the project.

Attached hereto as Exhibit “A” is the PPA executed on February 6, 2026. Attached hereto as Exhibit “D” expressing Will-Power’s Intent to Supplement as additional materials become available or applicable to the project; Exhibit “E” Project Aquila’s permitting information; Exhibit “F” estimating the impact of generating sources on the State Implementation Plan for air quality; Exhibit “G” re-submitting Exhibits A and B to the PPA; Exhibit “H” providing Project Aquila’s emergency response procedures; Exhibit “I” providing Will-Power’s insurance information; and Exhibit “J” regarding the notice to which the Large Load Customer is entitled.

In support of its amended application, pursuant to R746-318-201 and R746-318-601, Will-Power states as follows:

I. THE FILING PURSUANT TO R746-318-201 and R746-318-601.

1. Will-Power and customer executed the PPA on February 6, 2026, as reflected by the attached Exhibit A, in compliance with R746-318-201(1).
2. No qualified electric utility is a party to the PPA.
3. An appropriately redacted version of the application for Commission approval of the PPA has been served upon the Rocky Mountain Power as of the date of this filing pursuant to R746-318-201(3).
4. Project Aquila is a closed posed private generation system, which will operate with complete separation from Rocky Mountain Power’s system.
5. Project Aquila is not connected to and operates independently from the transmission system of any qualified electric utility, cooperative utility, municipal utility, or any other utility.
6. Rocky Mountain Power has no duty to provide electric service including any ancillary services.
7. Rocky Mountain Power will not provide backup power in the event of an outage.
8. Will-Power will not increase Rocky Mountain Power’s electricity demand to serve the customer.

9. As customer has entered into a PPA for a closed private generation system, it is not required to submit a large-scale service request pursuant to 54-26-301(5).

10. Upon completion of this Docket No. 25-2660-01, Will-Power will provide notice to the customer of any conditions imposed on its registration by the Commission.

11. In addition to the PPA, Will-Power has determined that it will install an additional service lateral connecting the facility to the Kern River pipeline in a location adjacent to the originally planned pipeline.

II. DEVIATION.

12. Pursuant to R746-1-109, Will-Power respectfully requests a deviation from the 15-day timeline provided for in R746-318-201(1).

13. As the first party to file a closed private generation contract, Will-Power and customer worked diligently to ensure that all requirements under R746-318 were met, however, the dialog and commercial process to determine which sections of the PPA could be redacted were unable to be completed in the 15-day timeframe.

14. Project Aquila is still in the pre-operational phase and will operate completely separately from Rocky Mountain Power. Will-Power is engaged in an ongoing good faith dialogue with Rocky Mountain Power regarding how to best demonstrate complete separation. Will-Power is working diligently internally, and with Rocky Mountain Power, to satisfy the requirements found in R746-318-601(2)(d). Will-Power therefore requests deviation from R746-318-601(2)(d) as it continues to work towards demonstrating complete separation from Rocky Mountain Power, allowing the Qualified Electrical Utility to execute the required declaration.

15. To the extent that any of the additional information requested by the Commission or required under the regulations is not yet available to Will-Power due to the present pre-operation status of Project Aquila, Will-Power requests deviation from these requirements and expresses its intent to supplement its Amended Application as the information becomes available.

III. CONFIDENTIALITY.

16. Will-Power requests confidential treatment of certain confidential information contained in the filing including the PPA found in Exhibit “A,” the estimated impact of generating sources on the state implementation plan for air quality found in Exhibit “F,” the technical schematics found in Exhibit “G,” and the emergency response procedures found in Exhibit “H.”

17. Confidential information has been uploaded to the Commission’s SFTP site. Confidential information is provided subject to R746-318-103 of the Public Service Commission of Utah Rules.

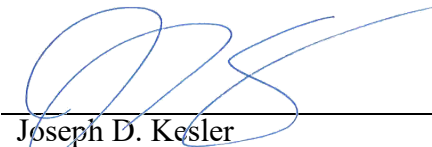
IV. REQUESTS FOR RELIEF.

1. Will-Power respectfully requests that the Commission issue an order approving the PPA for a large load contract.

2. Will-Power respectfully requests that the Commission grant the requested deviation.

DATED this 7th day of May, 2026.

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of May, 2026, I caused a true and correct copy of this document, **AMENDMENT TO LARGE-SCALE GENERATION PROVIDER'S APPLICATION FOR A CLOSED PRIVATE GENERATION CONTRACT** to be served via email to the following:

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