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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Abdinasir Abdulle, Utility Technical Consultant Supervisor
Justin Shelton, Utility Analyst

Date: September 14, 2026

Re: **Docket No. 26-506-05**, Deseret Generation and Transmission Co-Operative, Inc.'s Carbon Emissions Reduction Final Progress Report through December 2025

Recommendation (Acknowledge)

The Division of Public Utilities ("Division") has reviewed Deseret Generation and Transmission Co-Operative's ("Deseret" or "Cooperative") Carbon Emissions Reduction Final Progress Report ("Final Progress Report") through December 2025 and recommends that the Public Service Commission of Utah ("Commission") acknowledge the Final Progress Report, as it appears to comply with the Utah Energy Resource Procurement Act, Title 54, Chapter 17, Section 604. As a cooperative association, Deseret filed its Final Progress Report with its Board of Directors, as required by Section 54-17-604(5), and represents that the 20 percent Renewable Portfolio Goal for 2025 was achieved.¹ The Division recommends the Commission acknowledge that no further reporting under the Renewable Portfolio Goal provisions of the Act is required.

Issue

Deseret, a cooperative association and a member of Utah Rural Electric Cooperative Association (URECA), filed its Carbon Emissions Reduction Final Progress Report through

¹ Nathaniel Johnson URECA Executive Director verified on 9/11/2026.

Division of Public Utilities

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December 2025 with its Board of Directors in compliance with the Utah Energy Resource Procurement Act (“the Act”), Title 54, Chapter 17, Section 604(5). Under Section 54-17-604(12), the plan and progress reports filed by a cooperative association are made publicly available at the cooperative association’s office.² The Final Progress Report is the concluding report in the reporting cycle established under Title 54, Chapter 17, Part 6, and addresses actual results through the end of December 2025. In the Final Progress Report, Deseret represents that it achieved Utah’s 20 percent Renewable Portfolio Goal for 2025. This memo is in response to the Division’s review of the Final Progress Report.

Discussion

Utah Code Ann. § 54-17, Part 6 establishes the Renewable Portfolio Goal (“RPG”), a voluntary, cost-effective target for privately owned electrical corporations and cooperative associations to derive 20 percent of their adjusted retail electric sales from renewable energy sources by 2025, but only to the extent that it is cost effective to do so. Under Section 54-17-604(5), by July 1, 2026, each electrical corporation must file a final progress report demonstrating either how Subsection 54-17-602(1) is satisfied for the year 2025, or the reason why it is not satisfied for the year 2025. The reporting entity reports the actual and projected amount of qualifying electricity through 2025 and the source of that qualifying electricity, provides cost or cost-effectiveness information, and describes conditions impacting renewable energy and qualifying electricity markets.

Included in the Final Progress Report is Deseret’s summary of the actual amount and source of qualifying electricity through 2025. The composition of Deseret’s 2025 qualifying electricity by source is summarized below.

Source	2025 MWh Forecasted	2025 MWh Actual
CRSP, Hydro, and DGT solar	430,933	343,599
Community Solar Projects	1,386	630
EIM Purchases	391,826	487,639
Total	824,145	831,868
Qualifying Electricity as a percentage of retail sales	37%	37%

² *Id*

Deseret has had excess capacity at least through 2025. Accordingly, Deseret did not seek additional resources from the market during the reporting period.

With respect to recommended legislative or program changes, Deseret representatives recommend that the 20 percent Renewable Portfolio Goal be eliminated from the code after 2025, given the realities of the electricity market from the program's inception to date. Deseret further recommends that increases in renewable resources occur through technological advances and innovation rather than government mandates. The Division has reviewed Deseret's methodologies and the qualifying resources listed in the Final Progress Report, including the treatment of WAPA hydropower deliveries certified through the Western Renewable Energy Generation Information System³ and the optional member programs, and finds that the Final Progress Report appears to comply with the reporting requirements of the Act.

Conclusion

The Division has reviewed Deseret's Carbon Emission Reduction Final Progress Report through December 2025 and finds that it appears to comply with the Utah Energy Resource Procurement Act, Title 54, Chapter 17, Section 604. The Final Progress Report demonstrates that Deseret derived approximately 37 percent of its 2025 retail sales from renewable energy, above the 20 percent Renewable Portfolio Goal. The Division recommends the Commission acknowledge the Final Progress Report and confirm that no further reporting under the Renewable Portfolio Goal provisions of the Act is required.

cc: Michele Beck, Office of Consumer Services
Nathaniel J Johnson, Utah Rural Electric Cooperative Association

³ Wapa.gov/about-wapa/regions/dsw/power-marketing/dsw-rec-program/