

- BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION -

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Building for the Future through Electric  
Regional Transmission Planning and Cost  
Allocation and Generator Interconnection

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DOCKET NO. RM21-17-000  
COMMENTS IN OPPOSITION FROM THE  
UTAH PUBLIC SERVICE COMMISSION

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The Utah Public Service Commission (UPSC) appreciates this opportunity to submit comments regarding the Federal Energy Regulatory Commission’s (FERC or “Commission”) Notice of Rulemaking (“Notice”).<sup>1</sup>

The Notice spans nearly 350 pages (exclusive of appendices) and invites comments on the many intricacies of the Commission’s broad and transformative proposals, indicating the Commission’s intention to seek comments on approximately 60 issues.

With a small staff that is generally preoccupied with presiding over the many regulatory dockets entrusted to its jurisdiction, the UPSC cannot offer exhaustive comments on the particularities of the Commission’s proposals. Additionally, though the Notice proposes to implement rules applicable nationwide, many of the problems it perceives and solutions it proposes focus on regions that rely on a regional transmission operator (RTO) or independent system operator (ISO).<sup>2</sup> Because the UPSC does not regulate a utility that participates in an RTO, it is not particularly well suited to speak to the issues such jurisdictions may be experiencing or whether the Notice’s proposed reforms may effectively remediate them.

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<sup>1</sup> *Building for the Future through Electric Regional Transmission Planning & Cost Allocation & Generator Interconnection*, 87 FR 33476 (June 2, 2022), 179 FERC ¶ 61,028 (2022) (hereafter “Notice”).

<sup>2</sup> Hereafter, these comments use the term “RTO” to refer synonymously to RTOs and ISOs.

Therefore, the UPSC's comments focus on general objections regarding FERC's authority to write rules for the purpose of shaping states' generation portfolios, the problems associated with imposing national rules designed for regions with an RTO on regions that do not participate in an RTO, and the problems such a one-size-fits-all regulatory approach may pose for Utah's (primary) electric service provider, which must contend with operating a shared system subject to the jurisdiction of six different state commissions in states that have widely divergent policies with respect to renewable generation and decarbonization.

**1. Regional Background: Whatever Problems Exist in RTO Regions, Utah's Primary Electric Service Provider Has Long Successfully Operated a Shared System among Six Different States, Engaging Collaboratively with Stakeholders and Regulators to Plan and Expand Transmission and to Allocate Costs Pursuant to a Negotiated Agreement that Preserves Each State's Authority and Autonomy.**

To contextualize its comments, the UPSC offers a brief summary of its interest in transmission planning and the process as it presently exists in Utah's region.

The UPSC's interest in the Commission's proposed reforms are primarily concerned with the potential impact on PacifiCorp because it is, by far, the largest electric utility the UPSC regulates.<sup>3</sup> An investor-owned utility, PacifiCorp serves retail customers in Utah and five other Western states: Wyoming, Idaho, Oregon, Washington, and California. In Utah, PacifiCorp serves approximately 80 percent of the retail load.<sup>4</sup> Like other utilities in most western states (save for California), PacifiCorp does not rely on an RTO.

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<sup>3</sup> In Utah, PacifiCorp does business as Rocky Mountain Power.

<sup>4</sup> Utah's remaining customers receive service primarily from municipal utilities, which the UPSC does not regulate, or rural electric cooperatives and electric service districts, subject to minimal state regulation.

Being subject to the jurisdiction of six different state commissions when planning for a common, largely shared system requires PacifiCorp to work extensively with all affected stakeholders and regulators. Compounding that task, through their elected legislatures, several of the state constituencies in PacifiCorp's service territory (e.g. California, Washington, and Oregon) have enacted highly ambitious policies with respect to decarbonization and renewable energy development. The residents and lawmakers of Utah and other states in the service territory have not adopted such policies and, accordingly, the UPSC has retained its role as an economic regulator without metamorphosing its commissioners into decarbonization tzars.

Notably, consumers in Utah, Idaho and Wyoming enjoy average electricity rates lower than 45 other states.<sup>5</sup> California's rates are among the most expensive in the country and approximately double the average rates in Utah, Idaho, and Wyoming.<sup>6</sup> Accompanying relatively low rates is an impressive record of electric reliability in Utah, Idaho, and Wyoming.<sup>7</sup> It is essential, therefore, that each state commission in PacifiCorp's service territory retain its well-established authority over the generation mix that serves its state and the transmission costs that are ultimately recovered through retail rates.

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<sup>5</sup> See, e.g., Nebraska Department of Environment and Energy, *Annual Average Electricity Price Comparison by State*, available at <https://neo.ne.gov/programs/stats/inf/204.htm>; see also Citizens Utility Board, *Electric Utility Performance: A State-by-State Review* at 6-7, available at [https://www.citizensutilityboard.org/wp-content/uploads/2021/07/Electric-Utility-Performance-A-State-By-State-Data-Review\\_final.pdf](https://www.citizensutilityboard.org/wp-content/uploads/2021/07/Electric-Utility-Performance-A-State-By-State-Data-Review_final.pdf).

<sup>6</sup> See *id.* Average rates are competitive in Oregon, which enjoys access to abundant pre-existing hydroelectric power generation that accounts for roughly 50 percent of its electricity. See, e.g., U.S. Energy Information Administration, *Oregon State Energy Profile*, available at <https://www.eia.gov/state/print.php?sid=OR>.

<sup>7</sup> Citizens Utility Board, *Electric Utility Performance: A State-by-State Review* at 16, available at [https://www.citizensutilityboard.org/wp-content/uploads/2021/07/Electric-Utility-Performance-A-State-By-State-Data-Review\\_final.pdf](https://www.citizensutilityboard.org/wp-content/uploads/2021/07/Electric-Utility-Performance-A-State-By-State-Data-Review_final.pdf).

Notwithstanding the challenges associated with jurisdictional diversity, PacifiCorp successfully engages in productive system and regional transmission planning and cost allocation that accommodates each state's autonomy and authority. In fact, for nearly two decades, PacifiCorp has allocated costs among the states in its service territory by relying on its "collaborative multi-state process" (MSP), a cost allocation methodology that affected stakeholders throughout the service territory negotiate and PacifiCorp subsequently submits to each state commission for approval.<sup>8</sup>

Having successfully managed the complexities associated with a multi-state service territory for many years, PacifiCorp unsurprisingly urges caution with respect to "developing a national rule of any kind ... applied to transmission planning and cost allocation."<sup>9</sup>

With respect to regional transmission planning and the requirements of FERC Order Nos. 890 and 1000, PacifiCorp participates through its membership in NorthernGrid, an association formed to facilitate regional transmission planning.<sup>10</sup> NorthernGrid was established in 2020 as a successor organization to ColumbiaGrid and Northern Tier Transmission Group after stakeholders labored for more than four years to dissolve and combine them for the purpose of creating a broader, more geographically diverse planning group across the Intermountain West and Pacific Northwest.

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<sup>8</sup> State commissions approve these stipulated cost allocation methodologies through a specified term, and stakeholders convene in advance of their expiration to explore and negotiate changes that are then submitted to commissions for approval to govern a new term.

<sup>9</sup> Initial Comments of Berkshire Hathaway Energy at 7, filed October 12, 2021. For simplicity, these comments refer to the comments of PacifiCorp's parent company, Berkshire Hathaway Energy, as PacifiCorp's comments.

<sup>10</sup> NorthernGrid's members include utilities that serve customers in California, Idaho, Montana, Oregon, Utah, Washington, and Wyoming.

In its filed comments on the Advanced Notice of Proposed Rulemaking (ANOPR),<sup>11</sup> PacifiCorp attests to these efforts and to the value NorthernGrid has brought to regional transmission planning, explaining its “structure ... provides a delicate balance between FERC-jurisdictional and non-jurisdictional entities as well as a meaningful role for state regulators.”<sup>12</sup> NorthernGrid’s members have executed a Planning Agreement that provides the region with one common set of data and assumptions, and it employs a 10-year planning horizon by default, but allows eligible customers to request a longer or different period.

Each NorthernGrid member develops local transmission and resource plans and, in turn, submits them to NorthernGrid, which uses the data to analyze various scenarios that accommodate each member’s respective plan as well as transmission submittals from non-members, any interregional projects, and applicable laws within the planning region. NorthernGrid affords stakeholders and state commissions an opportunity to submit additional information and alternative planning scenarios. PacifiCorp describes it as a “robust process that results in a regional plan that identifies the benefits and any reliability issues associated with each scenario and the final regional plan.”<sup>13</sup> PacifiCorp emphasizes this planning process includes members’ resource plans and appropriately considers applicable climate and energy laws.

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<sup>11</sup> *Building for the Future through Electric Regional Transmission Planning & Cost Allocation & Generator Interconnection*, 86 FR 40266 (July 15, 2021), 176 FERC ¶ 61,024 (2021) (hereafter ANOPR).

<sup>12</sup> Initial Comments of Berkshire Hathaway Energy at 9, filed October 12, 2021.

<sup>13</sup> *Id.* at 13.

For its part, PacifiCorp invests substantially in integrated resource planning, the primary objective of which is to identify an optimal resource portfolio that is least-cost, least-risk. PacifiCorp completes this planning process every two years and updates it in the off years. Stakeholder participation, involving all interested parties, is fundamental to the process and the PSC strictly enforces this requirement. PacifiCorp's resource plans consider customer demand for clean energy and, of course, compliance with applicable state and federal regulations in its planning process. PacifiCorp's integrated resource plans (IRPs) are ultimately filed with each state's commission for acknowledgment. PacifiCorp's inclusion of a generation or transmission resource in an acknowledged IRP is a factor the UPSC considers in requests for cost recovery.

**2. The UPSC's General Objections to the Notice.**

- a. The Notice's Proposed Rules Exceed the Commission's Authority to Rectify Unreasonable or Unjust Practices that Affect Transmission Rates under Section 206 of the Federal Power Act.*

In proposing sweeping national reforms to electric regional transmission planning and cost allocation requirements, the Commission relies exclusively on its authority delegated under Section 206 of the Federal Power Act (hereafter "Section 206").<sup>14</sup>

Generally, Section 206 empowers the Commission to remediate transmission rates (more broadly, "jurisdictional-rates") and practices that affect such rates where the Commission finds substantial evidence demonstrates the rate or practice is unjust, unreasonable, unduly discriminatory, or preferential. The UPSC acknowledges courts have sometimes taken a

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<sup>14</sup> 16 U.S.C. 824e

relatively expansive view of this authority. The Commission relied on Section 206 when it issued Order 1000, requiring transmission providers participate in regional transmission planning.<sup>15</sup>

However, the Federal Power Act expressly denies FERC jurisdiction over certain matters reserved to the states, including “facilities used for the generation of electricity.”<sup>16</sup> States’ authority over generation facilities, including their preferred generation resource mixes, is unquestioned and acknowledged by this Commission. As Commissioner Glick recently wrote: “The FPA is clear. The states, not [FERC], are the entities responsible for shaping the generation mix.”<sup>17</sup>

In its comments to the ANOPR, the UPSC emphasized this point and highlighted its concern the ANOPR unreservedly announced FERC’s intention to reshape transmission planning and cost allocation for the purpose of expanding the transmission system “in areas with high degrees of renewable resources” that require “extensive” and “more expensive” new transmission facilities.”<sup>18</sup>

Now, in the Notice, FERC again leaves no ambiguity about its intention to push transmission expansion into remote areas to facilitate increased renewable generation. The Notice states more than 100 times that its proposals are “driven by changes in the resource mix

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<sup>15</sup> See *S.C. Pub. Serv. Auth. v. Fed. Energy Reg. Comm.*, 762 F.3d 41 (D.C. Cir. 2014) (upholding regulations imposed under Order 1000 generally because the court held they were designed to remedy practices FERC found, on substantial evidence, resulted in undue discrimination and preference in transmission service and the regulations did not infringe on matters entrusted to the states under the FPA).

<sup>16</sup> 16 U.S.C. 824.

<sup>17</sup> *Calpine Corp., et al. vs. PJM Interconnection, L.L.C.*, 171 FERC ¶ 61,035 (2020) (Commissioner Glick dissenting at ¶ 5); see also 16 USC § 824(b)(1) (providing FERC “shall not have jurisdiction ... over facilities used for the generation of electric energy”).

<sup>18</sup> UPSC Comments to ANOPR at 2 (quoting ANOPR at ¶ 40).

and demand” and makes clear the changes to which it refers predominantly concern expanding transmission access to accommodate remote renewable generation.<sup>19</sup>

The UPSC will not further belabor these comments with a legal brief on the parameters of FERC’s jurisdiction: the UPSC’s position is that FERC has no authority to enact any rule for the purpose of influencing the resource generation mix or expanding development of any type of generation. As the UPSC explained in its previous comments: “Increased development and integration of renewable generation is a highly charged political question and a matter of significant political interest” about which state legislatures have made very different policy choices.<sup>20</sup> Though courts have given FERC some latitude under Section 206, the UPSC is confident the highest court would not uphold FERC’s claimed authority to prescribe a single, onerous national regime for transmission planning specifically intended to pressure transmission providers to select costly expansions into remote areas for the purpose of realizing FERC’s preferred generation mix, a matter specifically reserved to the states.

Less than two months ago, the United States Supreme Court rejected the Environmental Protection Agency’s claim to authority under the Clean Air Act to devise carbon emissions caps based on a “generation shifting” approach.<sup>21</sup> Employing reasoning that is arguably even more applicable to the FERC context, the Court found it “highly unlikely that Congress would leave to agency discretion the decision of how much coal-based generation there should be over the

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<sup>19</sup> Notice at ¶ 45 (“The generation fleet is changing rapidly ... taking the form of a shift from large, centralized resources located close to population centers toward renewable resources ... that are often ... located far from load centers.”)

<sup>20</sup> UPSC’s Comments to ANOPR filed Oct. 12, 2021 at 2.

<sup>21</sup> *West Virginia v. EPA*, 142 S. Ct. 2587 (2022).



coming decades.”<sup>22</sup> The Court went on to quote a treatise explaining “Even if Congress has delegated an agency general rule-making or adjudicatory power, judges presume that Congress does not delegate its authority to settle or amend major social and economic policy decisions.”<sup>23</sup>

The UPSC respectfully submits that imposing a single set of federally mandated, highly prescriptive transmission planning and cost allocation requirements for the purpose of privileging the selection of costly transmission projects to serve remote and speculative renewable generation is not a lawful exercise of FERC’s authority under Section 206. Any reforms FERC might lawfully implement with respect to transmission planning must be wholly indifferent as to the consequent resource generation mix, preserving each state’s authority over generation and allowing stakeholders in the region to select the most economic alternatives aligned with their respective preferences.

*b. Imposing Broad Federal Transmission Planning and Cost Allocation Reforms Designed Primarily to Address Perceived Deficiencies in Jurisdictions that Rely on an RTO is Inadvisable and Likely to Create Foreseeable and Unforeseeable Problems for Utilities that Operate Multi-State, Shared Systems outside the Governance of an RTO.*

As the foregoing section attempts to illustrate, despite unique challenges, PacifiCorp operates a largely shared multi-state system successfully and in accordance with each state’s independent authority. While the UPSC disputes the Commission’s claimed authority to impose federal regulations designed to expand the transmission system specifically “in areas with high

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<sup>22</sup> *Id.* at 2613 (internal quotation omitted); *see also FDA v. Brown & William Tobacco Corp.*, 529 U.S. 120, 160 (2000) (“We are confident that Congress could not have intended to delegate a decision of such economic and political significance to an agency in so cryptic a fashion.”).

<sup>23</sup> *Id.* (quoting W. Eskridge, *Interpreting Law: A Primer on How to Read Statutes and the Constitution* 288 (2016)).

degrees of renewable resources” (discussed *infra* at 7-8),<sup>24</sup> it is worth noting that PacifiCorp’s existing collaborative, multi-state processes have facilitated and continue to facilitate such expansion. For example, early this year, the UPSC approved a certificate of public convenience and necessity for a 416-mile, 500 kV line (“Gateway South”) that connects two areas of PacifiCorp’s system that are abundant in two different forms of renewable generation (wind-rich eastern Wyoming and solar-rich southern Utah).<sup>25</sup>

Relatedly, the Notice’s dissenting commissioner expresses skepticism that many of the problems the Commission seeks to address exist throughout the country or beyond certain RTOs, citing record evidence suggesting public utilities in a non-RTO region are impressively managing transmission expansion and renewable integration.<sup>26</sup>

In light of PacifiCorp’s relative success in managing transmission planning and cost allocation under conditions requiring collaboration among six states and their competing policies, it is hardly surprising that PacifiCorp urges the Commission to “work with industry, and state commissions on incremental change rather than periodic wholesale overhauls of the system that can disrupt ongoing plans for development” because “outside of an RTO structure, it is []

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<sup>24</sup> ANOPR at ¶ 40.

<sup>25</sup> *Application of Rocky Mountain Power for a Certificate of Public Convenience and Necessity for the Gateway South Transmission Project*, UPSC Docket No. 21-035-54, Order issued April 8, 2022. Gateway South is one segment of PacifiCorp’s much larger Energy Gateway Transmission Expansion Plan, which includes over 2000 miles of new transmission that PacifiCorp explains is intended to connect “resource-rich areas and major load centers across PacifiCorp’s multi-state service territory.” Initial Comments of Berkshire Hathaway Energy at 4, filed October 12, 2021.

<sup>26</sup> Notice, Commissioner Danly’s Dissent at ¶ 15.

state commissions that can best balance the reliability, economic, and policy determinations” that drive transmission development.<sup>27</sup>

Heavy-handed federal mandates poorly tailored to the region that eliminate flexibility and disregard regional expertise in transmission planning will sow immense confusion and spew inefficiencies in the form of compliance costs and litigation. Indeed, the confusion in PacifiCorp’s region can hardly be overstated where one of FERC’s commissioners earnestly confesses: “I do not know how most of these proposals are supposed to work in non-RTO regions. Nor, apparently, does anyone else.”<sup>28</sup>

PacifiCorp, state commissions, and other stakeholders in this region already contend with many challenges associated with participating in a multi-state, shared system where the states’ sometimes enact antithetical laws and policies. The various jurisdictions already collaborate and stipulate to cost allocation, and it is difficult to imagine how eliminating the regional transmission planners’ ability to consider factors that are known and agreed upon in the region to be appropriate to the region in favor of a one-size-fits-all federally prescribed formula will make for better or more efficient transmission planning.

The highly prescriptive, inflexible federal mandates the Notice proposes are far more likely to exacerbate the challenges associated with a politically divergent, multi-state system than

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<sup>27</sup> Initial Comments of Berkshire Hathaway Energy at 8, filed October 12, 2021. PacifiCorp is hardly alone in pleading with the Commission to recognize and accommodate important regional differences before implementing broad, inflexible federal rules. In response to the ANOPR, the Commission received comments from a diverse subset of stakeholders that emphasized the importance of recognizing and accommodating regional differences.<sup>27</sup> (See Notice at ¶ 243 & at dissent ¶¶ 12-18.)

<sup>28</sup> Notice, Commissioner Danly’s Dissent at ¶ 14.

ameliorate them. They will present one more front on which to fight rather than collaborate. They will conscript substantial resources to conduct the vast amounts of study and compliance work the Notice prescribes — even where stakeholders in the region may have little or no use for such studies and potentially forego studies they believe would better inform their planning decisions.

Finally, though these comments emphasize the regional differences that apply to Utah and other jurisdictions that do not rely on an RTO, the UPSC is aware that proponents exist among our stakeholders for PacifiCorp to join one. Utah's ability to preserve its lawful authority to govern its generation mix and otherwise ensure Utah customers' rates reflect the policies of their own elected representatives will be an essential and primary consideration in the event that the UPSC is asked to approve a decision by PacifiCorp to join. To the extent any of the Notice's proposed reforms meaningfully infringe on state autonomy and authority in RTO jurisdictions, they increase the difficulty the UPSC would face in considering whether to approve such a decision. The same is likely true of the many other western and southeastern states whose utilities currently are not participating in an RTO.

**3. The UPSC's Objections to Specific Proposals in the Notice.**

In the timeframe allotted for comments, the UPSC cannot possibly provide input on the approximately five dozen particular issues for which FERC sought specific comment. Briefly, the UPSC discusses below those issues it believes to be most significant and of interest to Utah. The UPSC's failure to address any particular issue should not be construed as support.

- i. *Stakeholders invested substantially in the creation of NorthernGrid and its planning process two years ago, determining that a 10-year planning horizon is appropriate for the region, and the UPSC opposes substituting their carefully considered decision with a nationwide 20-year mandate that fails to consider whether this is appropriate for the region.*

As explained *supra* at 5, NorthernGrid has elected to use a default 10-year planning horizon for the transmission planning process it developed and implemented as recently as 2020. Simply put, if stakeholders in the region and NorthernGrid's members believed a 20-year planning horizon would yield a more effective and efficient planning process, they would have adopted it. Perhaps, a longer time horizon is preferable in other regions with different market structures, policy objectives, and constraints. The UPSC takes no position on the matter.<sup>29</sup> However, given that stakeholders in the Intermountain West and Pacific Northwest labored very recently to develop a transmission planning process tailored and appropriate to the region, the UPSC strongly objects to the Commission compelling them to abandon that carefully considered process in favor of a one-size-fits-all federally prescribed agency mandate.

Additionally, several of the Commission's proposed mandatory factors compound the issues attendant to a 20-year planning horizon, as discussed below.

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<sup>29</sup> The IRP process the UPSC has approved for PacifiCorp requires a 20 year outlook, but similar to the NorthernGrid process, limits the business plan to a 10-year horizon.

- b. *The UPSC objects to the Commission's proposal to require regional transmission planners to consider numerous factors that require imprudent speculation and enjoin planners from considering any other factor absent leave of the Commission.*

The UPSC strongly opposes, in principle, FERC's proposal to mandate a single set of nationally applicable factors that dictate the parameters transmission planners are allowed to consider in diverse regions. As discussed above, PacifiCorp and many other commenters have emphasized that regional flexibility is essential in transmission planning. NorthernGrid's extant process already considers a number of the factors the Commission seeks to enshrine in rule. For example, PacifiCorp's and other members' IRPs are an integral component of NorthernGrid's planning process. And, of course, NorthernGrid considers applicable federal and state laws to ensure its transmission plan does not run afoul of any applicable law or regulation *in the pertinent jurisdiction*.

Additionally, the Notice's proposed factors are objectionable, especially under a mandatory 20-year planning horizon. For example, FERC's proposal to "incorporate federal, state and local laws and regulations that may affect resource mix and demand" is simply untenable for a region like NorthernGrid where PacifiCorp operates a shared system in six different states without an RTO and those states (and local governments) have antithetical policies on decarbonization and renewable generation for all the reasons discussed *supra* at 3-4. Hard coding consideration of every state and local government's policies that "may" affect preferred resource mix into the transmission planning process over a 20-year planning horizon is even more problematic. Ever changing laws and regulations from all levels of government and conflicting policies from state to state and municipality to municipality create a complicated and

constantly moving target, especially when planning multiple decades into the future. These factors require regional planners to retain flexibility; a mandate from FERC, even if it were lawful, simply empowers some states to impose their policies on others in ways that will convolute the transmission planning process and that are likely to stall, rather than accelerate, investment in transmission.

The UPSC further objects to mandatory inclusion of any factor that NorthernGrid might deem too speculative to be included in a 20-year planning horizon. Numerous of the Notice's proposed factors may be insufficiently reliable (e.g. anticipated technological trends), but aspirational commitments of private companies, and similarly aspirational goals of federal and state governments that have not been enacted into law are certainly too speculative to be accounted for over a 20-year planning horizon.

Finally, the Notice's proposal to deny transmission providers any flexibility to include other factors they know to be pertinent to their planning region absent leave from FERC is representative of the troubling, overly prescriptive approach proposed reforms take throughout the Notice, tying regional planners' hands from employing their knowledge and expertise about the actual transmission needs of their region in order to better ensure transmission plans conducive to FERC's preferred generation mix are ultimately selected.

#### **4. Conclusion**

For all the reasons stated above, the UPSC objects to the reforms proposed in the Notice. Namely, these reforms will (i) result in unjust and unreasonable rates that shift policy choices of certain states to consumers in others; (ii) hinder expanded transmission development by miring it in a labyrinthine federal bureaucratic process and creating additional barriers to interstate and

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interregional collaboration; (3) result in economically inefficient planning by requiring planners to consider speculative and poorly defined factors two decades into the future and forcibly precluding them from considering factors they know to be most relevant for their respective regions; and (4) result in tremendous waste as stakeholders incur massive costly compliance to implement these reforms that are likely to fall in court because they patently exceed FERC's lawful authority under the Federal Power Act.

DATED at Salt Lake City, Utah, August 17, 2022.

/s/ Michael Hammer, Counsel

/s/ Thad LeVar, Chair

/s/ David R. Clark, Commissioner

/s/ Ron Allen, Commissioner

Utah Public Service Commission  
Heber M. Wells Building  
P.O. Box 4558  
Salt Lake City, UT 84145-4558