

October 29, 2025

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Administration

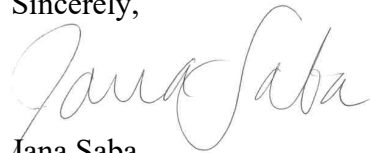
**RE: Docket No. 25-2666-01 – Application of Corix Utah City Heating and Cooling LLC for a Certificate of Public Convenience and Necessity for a Heat Corporation to Provide Heating and Cooling Services within the State of Utah**  
Rocky Mountain Power's Initial Comments

Per the August 28, 2025, Scheduling Order, Notice of Technical Conference, and Notice of Hearing in Docket No. 25-2666-01, PacifiCorp, d.b.a. Rocky Mountain Power ("RMP") submits these Initial Comments. RMP appreciates this opportunity to provide Initial Comments on the Application filed by Utah City Heating and Cooling LLC ("Corix").

On August 1, 2025, Corix filed its Application for a Certificate of Public Convenience and Necessity for a heat corporation to provide heating and cooling services within the state of Utah ("Application"). RMP submitted discovery to Corix on October 3, 2025 to gain a better understanding of the services Corix intends to provide and to confirm Corix does not intend to operate as an electric utility. Corix provided sufficient responses to RMP's questions, which are attached to these comments as Attachment 1. Based on the information provided by Corix, the Company does not oppose Corix's Application for CPCN approval.

Informal inquiries may be made to Max Backlund at [max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com) or (801)-220-3121.

Sincerely,



Jana Saba  
Director, Regulation and Regulatory Operations

## ATTACHMENT 1

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*Attorneys for Corix Utah City Heating and Cooling LLC*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of Corix Utah  
City Heating and Cooling LLC for a  
Certificate of Public Convenience and  
Necessity for a Heat Corporation to Provide  
Heating and Cooling Services within the State  
of Utah

Docket No. 25-2666-01

**CORIX UTAH CITY HEATING AND COOLING LLC'S RESPONSE TO THE  
FIRST SET OF DATA REQUESTS FROM ENBRIDGE GAS UTAH**

Corix Utah City Heating and Cooling LLC ("Corix") hereby responds to the First Set of  
Data Requests received from Rocky Mountain Power ("RMP").

DATED this 17<sup>th</sup> day of October 2025.

Corix Utah City Heating and Cooling LLC



/s/

Phillip J. Russell  
James Dodge Russell & Stephens, P.C.

Allan McGavin  
Corix District Energy Holdings LP

*Attorneys for Corix Utah City Heating and  
Cooling LLC*

**RMP 1.1:** Please provide all copies of any and all data requests submitted to and responded by Corix by any party in this proceeding. This is an ongoing request.

**Corix Response:**

Corix will provide RMP with copies of all data requests received and sent by Corix in this docket as well as all responses associated with those data requests. Corix has previously copied RMP on all responses it has provided to data requests sent by other parties to Corix.

**RMP 1.2:** How does Corix define “captive customers”?

**Corix Response:**

The term “captive customer” typically refers to a customer within the service area of a public utility that has been granted a monopoly franchise by law or by a regulatory body. The result is that only one public utility may provide that regulated service within the area and the customer does not have the ability to choose a different service provider.

In its Application in this docket, Corix used the term “captive consumer” in a different sense than when public utility competition within a service area is barred by law or regulation. On page 8 of its Application, Corix states as follows:

Thermal energy service is not a natural monopoly: rather, a consumer has the choice as to whether to use district energy or not, or may opt to use a different district energy service provider altogether. Therefore, a thermal energy provider must compete in the marketplace. In the case of the Utah City development, Applicant’s consumers will be the building owners (as opposed to low-volume residential customers). When such a consumer opts in to Applicant’s services, it does become a captive consumer, which can benefit from a regulatory process to ensure that these consumers receive just and reasonable rates.

Corix’s reference to “captive consumer” in the above quoted paragraph does not indicate a legal or regulatory barrier to competition. Rather, it indicates that when a customer opts to receive thermal energy services there may be contractual and/or economic barriers to receiving heating and cooling services from another source. A thermal energy customer chooses to receive district energy services by entering into a long-term contract with the provider. The contract must ensure that the provider will recover the capital costs of installing facilities to enable the provision of service, and obligates the customer to receive the service for some period of time or to pay an appropriate termination fee. This commitment may represent an economic barrier to competition.

**RMP 1.3:** Does Corix intend to operate as an electric utility?

**Corix Response:**

Corix does not intend to operate as an electric utility.

**RMP 1.4:** Please confirm or deny Corix intends Rocky Mountain Power to provide electricity to Corix's customers?

**Corix Response:**

Corix will not provide electric service to its customer. Corix understands that the Utah City development is within Rocky Mountain Power's service territory and that Corix's customer will make its own arrangements with respect to the provision of electric service to it.

**RMP 1.5:** Please confirm or deny Corix intends [to] rely on Rocky Mountain Power to install and utilize individual meters used to measure electricity provided by Rocky Mountain Power for each of Corix's customers?

**Corix Response:**

Corix will provide thermal service to its customer and is not an electricity provider. Corix has no role in the installation or utilization of meters to measure electric usage by its customer. Any installation of individual electric meters is a matter between the electric customer and the electricity provider.



**RMP 1.6:** Please confirm or deny Corix intends [to] rely on Rocky Mountain Power to install and utilize individual electric meters for each of Corix's buildings?

**Corix Response:**

Corix intends that Rocky Mountain Power will provide electricity for Corix's buildings and facilities that it owns and operates. Corix understands that Rocky Mountain Power's Electric Service Regulations will apply to Corix as a customer, which include the installation and utilization of individual electric meters.

**RMP 1.7:** What rate schedule does Corix anticipate requesting for the purposes of receiving electric service from Rocky Mountain Power?

**Corix Response:**

Corix at this time plans to initially request electric service on Rocky Mountain Power's Electric Service Schedule No. 6 – General Service. The applicable electric service may change over time.

**RMP 1.8:** What will Corix' electricity load be for each phase of development?

**Corix Response:**

Phase 1: The electricity load at the Phase 1 interim energy center is currently forecasted to increase from approximately 400 kW in 2026 to approximately 1,500 kW in 2028.

At buildout: Full buildout includes one more interim energy center and 3 permanent energy centers. Timing of the future phase energy centers will vary based on the development schedule. The future electricity load is driven by the ultimate build-out and the demand intensity of the future buildings which have yet to be designed. Further the technology choice of the future energy centers will also have an impact on electrical load. Given all this uncertainty, it is too early to accurately forecast electrical load in future phases.

**RMP 1.9:** With regards to Corix’s technical conference presentation before the Utah Public Service Commission on September 25, 2025, specifically Corix’s reference to utilizing Rocky Mountain Power’s demand-side management (“DSM”) program:

- (a) When does Corix anticipate utilizing Rocky Mountain Power’s DSM program

**Corix Response:**

Corix is currently assessing the eligibility of its Phase 1 Energy Center for participation in Rocky Mountain Power’s Demand Side Management (DSM) programs. We anticipate engaging directly with Rocky Mountain Power’s customer service team later this fall to initiate the application process, once our commissioning strategy for Phase 1 has been finalized. This timing will ensure alignment between DSM program requirements and our operational planning.

## **CERTIFICATE OF SERVICE**

Docket No. 25-2666-01

I hereby certify that on October 29, 2025, a true and correct copy of the foregoing was served by electronic mail to the following:

### **Utah Office of Consumer Services**

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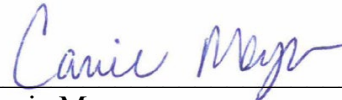
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