ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

1407 W. North Temple, Suite 330
Salt Lake City, UT 84116

May 1, 2025

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

Re: Docket No. 25-035-01
Rocky Mountain Power's Application for Approval of the 2025 Energy Balancing Account
Rocky Mountain Power's Application

In accordance with Utah Public Service Commission ("Commission") Rule 746-1-203, PacifiCorp, d.b.a. Rocky Mountain Power, hereby submits for electronic filing its Application for Approval of the 2025 Energy Balancing Account. The Application is accompanied by the direct testimonies, exhibits and workpapers of Mr. Jack Painter and Mr. Robert M. Meredith and the applicable filing requirements.

The enclosed proposed tariff sheets are associated with Tariff P.S.C.U. No. 51 of Rocky Mountain Power, applicable to electric service in the State of Utah. Pursuant to the requirement of Rule R746-405-2D, PacifiCorp states that the proposed tariff sheet does not constitute a violation of state law or Commission rule.

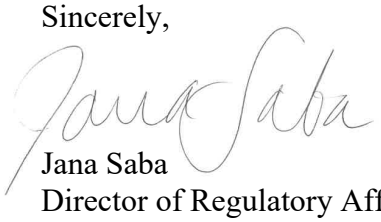
Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
utahdockets@pacificorp.com
katherine.smith@pacificorp.com
ajay.kumar@pacificorp.com
max.backlund@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Max Backlund at (801) 220-3121.

Sincerely,



Jana Saba
Director of Regulatory Affairs

cc: Division of Public Utilities (DPU)
Office of Consumer Services (OCS)

CERTIFICATE OF SERVICE

Docket No. 25-035-01

I hereby certify that on May 1, 2025, a true and correct copy of the foregoing was served by electronic mail to the following:

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Attorneys for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF ROCKY MOUNTAIN POWER'S APPLICATION FOR APPROVAL OF THE 2025 ENERGY BALANCING ACCOUNT	))))	Docket No. 25-035-01

ROCKY MOUNTAIN POWER'S APPLICATION FOR APPROVAL OF THE 2025 ENERGY BALANCING ACCOUNT

Rocky Mountain Power, a division of PacifiCorp ("Company" or "Rocky Mountain Power"), submits this application ("Application") to the Public Service Commission of Utah ("Commission") pursuant to energy balancing account mechanism ("EBA") tariff Schedule No. 94 ("Tariff Schedule 94"), requesting approval to recover approximately $471.6 million in deferred EBA Costs ("EBAC"). The $471.6 million deferral includes the following components: (1) approximately $474.9 million of EBA-related costs; (2) a credit of approximately $24.9 million for sales made to a special contract customer; (3) a $9.2 million adjustment for Utah situs resources; (4) a credit of $24.2 million to reflect the 2024 EBA Order; (5) a $0.2 million adjustment to reflect the remaining uncollected balance from the 2023 EBA; (6) a credit of approximately $0.1 million for Electric Vehicle Infrastructure Program ("EVIP") Schedule 60 revenue; (7) a credit of approximately $0.4 million to

update the 2023 Production Tax Credits; and (8) a charge of approximately $36.8 million in interest.

The Company has included revised Tariff Schedule 94 to recover from customers approximately $471.6 million over 12 months beginning July 1, 2025, on an interim basis through June 30, 2026. This results in an overall increase to retail customers of Tariff Schedule 94 of approximately $40.0 million, or 1.6 percent.

This Application is consistent with Tariff Schedule 94, approved by the Commission on July 17, 2012, as amended by the Commission's Order on EBA Interim Rate Process, issued August 30, 2012, and as amended in Docket Nos. 16-035-T05 and 09-035-15 by orders issued May 16, 2016, February 16, 2017, November 14, 2019, March 13, 2020, and consistent with the changes approved in Docket No. 23-035-T01 on February 2, 2023 (together, the "EBA Order").

The proposed EBA rate increase reflected in this Application represents an EBA rate adjustment under Tariff Schedule 94 as set forth above. It is allocated to rate schedules consistent with the base EBA amounts approved by the Commission in the Company's general rate case filing in Docket No. 20-035-04 (the "2020 GRC"), as more fully explained below. Rocky Mountain Power respectfully requests that, pursuant to the provisions in Tariff Schedule 94, this increase in Utah rates become effective, on an interim basis, July 1, 2025.

In support of its Application, Rocky Mountain Power states as follows:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon corporation, which provides electric service to retail customers through its Rocky Mountain Power

division in the states of Utah, Wyoming, and Idaho, and through its Pacific Power division in the states of Oregon, California, and Washington.

2. Rocky Mountain Power is a public utility in the state of Utah and is subject to the Commission's jurisdiction with respect to its prices and terms of electric service to retail customers in Utah. Rocky Mountain Power's principal place of business in Utah is 1407 West North Temple, Suite 310, Salt Lake City, Utah 84116.

3. Communications regarding this filing should be addressed to:

Max Backlund
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In addition, Rocky Mountain Power requests that all data requests regarding this Application be sent in Microsoft Word or plain text format to the following:

By email (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

Informal questions may be directed to Max Backlund, Utah Regulatory Affairs Manager at (801) 220-3121.

4. Tariff Schedule 94 permits the Company to monitor total EBAC on an unbundled basis apart from other investments and expenses included in base rates and to account for historical actual EBAC that may be over or under the amount recovered in base rates through the EBA.

5. Under Tariff Schedule 94, the Company files a deferred EBAC adjustment application annually on or before May 1. Included with this filing are changes to Tariff Schedule 94, which provide for a rate effective date on an interim basis of July 1, 2025. Changes to the EBA schedule related to the interim rate request are provided in more detail in this Application.

6. The EBA deferral calculation consists of three revenue requirement components: NPC, production tax credits ("PTCs") and wheeling revenue. NPC are defined as the sum of fuel expenses, wholesale purchased power expenses, wheeling expenses, less wholesale sales revenue. PTCs are included in the EBA as approved in the Company's 2020 GRC, which are an offset to the Company's federal income taxes based upon actual energy generated at eligible wind-powered generating facilities. Wheeling revenue includes amounts booked to FERC account 456.1, Revenues from Transmission of Electricity of Others. Collectively, the three components are known in Tariff Schedule 94 as "Energy Balancing Account Costs" or "EBAC".

7. The deferred EBAC is determined pursuant to Tariff Schedule 94 by comparing, in a deferral period, the actual NPC, PTCs and wheeling revenue to the total base EBAC recovered in rates as established in a general rate case. In addition, several

adjustments were made to actual NPC this year, as described in the direct testimony of NPC Specialist Jack Painter.

8. The deferral period for this Application is the 12-month period beginning January 1, 2024 through December 31, 2024 ("Deferral Period").

9. The request in this Application includes eight main components: (1) approximately $474.9 million of EBA-related costs; (2) a credit of approximately $24.9 million for sales made to a special contract customer; (3) a $9.2 million adjustment for Utah situs resources; (4) a credit of $24.2 million to reflect the 2024 EBA Order; (5) a $0.2 million adjustment to reflect the remaining uncollected balance from the 2023 EBA; (6) a credit of approximately $0.1 million for EVIP Schedule 60 revenue; (7) a credit of approximately $0.4 million to update the 2023 Production Tax Credits; and (8) a charge of approximately $36.8 million in interest.

10. The Company's request to charge approximately $36.8 million in interest includes $12.4 million, reflecting the estimated impact of carrying charges during the rate effective period of July 1, 2025 through June 30, 2026. While carrying charges have always accrued during the collection period, the Company is requesting this change to reflect a more accurate rate design by charging the interest throughout the collection period as part

of interim rates instead of subsequent EBA filings, as described in further detail in Mr. Painter's direct testimony.

11. For the Deferral Period, base NPC were set in the Company's 2020 general rate case, Docket No. 20-035-04, at approximately $1.431 billion ("Base NPC") and became effective January 1, 2021.

12. The main drivers of increased NPC in 2024 were coal fuel supply constraints, increased market power and natural gas prices, the conversion of Jim Bridger Unit 1 and Unit 2 from coal to natural gas, the decommissioning of the Company's hydro generating facilities on the Klamath river, and extreme weather events.

13. The Company's EVIP was established through a Settlement Stipulation that was approved by the Commission on December 20, 2021.[1] A credit of $51,052 is included in this Application because which is 33-percent of the total 2024 Schedule 60 revenues.

14. The Company calculated the EBA Deferral Amount using the Commission Order Method consistent with the stipulation approved by the Commission in the 2020 GRC, as set forth in detail in **Exhibit RMP___(JP-1)**, attached to Mr. Painter's direct testimony.

Deferred EBA Cost Adjustment

15. Pursuant to Tariff Schedule 94, the deferred EBAC adjustment is calculated monthly and recorded as a deferred expense on the Company's books. Mr. Painter's **Exhibit RMP___(JP-1),** shows the detailed calculation of the EBA Deferral Amount. Adjusted Actual Total NPC from January 1, 2024, through December 31, 2024, were

[1] *Application of Rocky Mountain Power for Approval of Electrical Vehicle Infrastructure Program* Docket No. 20-035-34, Order Approving Settlement Stipulation (Dec. 20, 2021).

approximately $2.597 billion, compared to the $1,431 billion Base NPC being used in this case.

16. As shown in **Exhibit RMP___(JP-1)**, the difference between Base NPC and Actual NPC was due to a $116 million reduction in wholesale sales, a $820 million increase in purchased power expense, a $75 million decrease in coal fuel expense, a $273 million increase in natural gas expense, and a $32 million increase in wheeling and other expenses. Mr. Painter further discusses the drivers causing the variance in net power costs for the deferral period.

17. As showing in **Exhibit RMP___(JP-1)**, Utah's allocated NPC before wheeling revenues were approximately $1.2 billion. After crediting Utah-allocated production tax credits of approximately $120 million and wheeling revenues of approximately $89 million, Utah actual EBAC were approximately $965 million shown on line 4, or $37.05 per megawatt-hour ("MWh"), shown on line 6.

18. In comparison, Utah Base EBAC were approximately $467 million shown on line 10, after crediting Utah-allocated production tax credits of approximately $106 million and wheeling revenues of approximately $51 million shown on lines 8 and 9, respectively, or $18.81 per MWh, shown on line 12. The monthly difference between lines 6 and 12 applied to Utah's 2024 load produces the deferred EBAC of approximately $475 million, shown on line 14.

19. An adjustment for sales to a special contract customer of approximately $25 million, after applying a deadband, is shown on line 17. An adjustment of approximately $9.2 million is shown on line 18 related to the Utah situs resources, namely the Utah Subscriber Solar Program, Schedule 136, Schedule 137, the Western Energy Imbalance

Market ("WEIM") Body of State Regulators ("BOSR") fees charged for commission related work as a participant in the WEIM, and the Western Power Pool ("WPP") Committee of State Representatives ("COSR") and Western Resource Adequacy Program ("WRAP") implementation costs and program coordination services. A $.24 million adjustment to reflect the remaining balance from the 2023 EBA is shown on line 25. A credit of $24.2 million to reflect the 2024 EBA Order is shown on line 24[2]. A charge for interest of approximately $12.3 million for the Deferral Period is shown on line 27. A charge for interest of approximately $6.0 million (from January 2025 through March 2025) is shown on line 29 and $6.1 million for April 2025 through June 2025 is shown on line 30. A credit of EVIP Schedule 60 revenue of approximately $51.1 million is shown on line 24. The total ending deferral amount of approximately $471.6 million is shown on line 32.

20. A summary of the total requested EBA recovery is shown in the table below.

Annual EBA Calculation

Calendar Year 2024 EBA Deferral		*Exhibit RMP___(JP-1) Reference*
Actual EBA ($/MWh)	$ 37.05	*Line 6*
Base EBA ($/MWh)	18.81	*Line 12*
$/MWh Differential	**$ 18.24**	
Utah Sales (MWh)	26,070,633	*Line 5*
EBA Deferrable*	$ 474,911,772	*Line 14*
Special Contract Customer Adjustment*	(24,903,951)	*Line 17*
Utah Situs Resource Adjustment*	9,220,126	*Line 18*
Total Deferrable	$ 459,227,947	*Line 19*
2023 EBA Collection True-Up	$ 238,367	*Line 25*
2024 EBA Final Order Adjustment	(24,244,080)	*Line 26*
Interest Accrued through December 31, 2024	12,324,881	*Line 27*
Interest Accrued January 1, 2025 through March 31, 2025	5,995,373	*Line 29*
Interest Accrued April 1, 2025 through June 30, 2025	6,144,341	*Line 30*
Interest Accrued through Rate Effective Period July 1, 2025 through June 30, 2026	12,376,556	*Line 31*
EVIP Revenue	(51,052)	*Line 24*
2023 PTC Update	(397,024)	*Line 23*
Requested EBA Recovery	**$ 471,615,308**	*Line 32*

** Calculated monthly*

[2] *In the Matter of Rocky Mountain Power's Application for Approval of the 2024 Energy Balancing Account*, Docket No. 24-035-01, Order (Feb. 25, 2025).

Proposed Interim Rate

21. In the 2021 Utah Legislative Session, Utah Code Ann. § 54-7-13.5(2)(k) permits the Commission to consider an interim rate request made as part of an electric corporation's filing of an energy balancing account. Prior to interim rate becoming effective, the Commission must hold a hearing on the interim rate request to consider whether the Company has made an adequate prima facie showing that the proposed interim rate appears consistent with prior years' filing and is more likely to reflect actual power costs than the current base rates.

22. In accordance with Utah Code Ann. § 54-7-13.5(2)(k), Rocky Mountain Power hereby requests the 2024 EBA recovery amount of $471.6 million be collected over 12 months on an interim basis beginning July 1, 2025 through June 30, 2026, subject to rate refund or surcharge.

23. This proposed rate change is consistent with prior years filing because it uses substantially similar methodologies to arrive at total EBAC. Using these methodologies, the Company has determined that EBAC has increased and is more likely to reflect actual power costs than the current base rates. The interim rates requested by the Company will be subject to future audit by the Division of Public Utilities and evaluation at a hearing by other parties.

24. Rocky Mountain Power hereby requests the Commission issue a notice of scheduling order so that a hearing date may be scheduled to facilitate interim rates becoming effective July 1, 2025.

Proposed Tariff Sheets

25. The Company's proposal is to spread the deferred EBAC across customer classes consistent with an EBA Allocator that allocates the Base EBA amounts approved by the Commission in the 2020 GRC by cost of service factor 10 or factor 30 for different FERC accounts, as appropriate. Allocation to the customer classes is shown in **Exhibit RMP___(RMM-1)**, attached to the direct testimony of Mr. Meredith.

26. The Company proposes to allocate the EBA deferral for CY 2024 to those customer classes that are not reflected in the cost of service study used in the 2020 GRC, such as Schedule 31 and Schedule 32 customers, as described in Mr. Meredith's direct testimony.

27. The table below summarizes the proposed price changes by tariff rate schedule. Mr. Meredith's **Exhibit RMP___(RMM-1),** displays the Company's proposed rate spread, as discussed above. The proposal would result in an overall increase of $40.0 million, or 1.6 percent to customers in Utah. Mr. Meredith's **Exhibit RMP___(RMM-2),** includes billing determinants and the calculations of the proposed EBA rates in this case. **Exhibit RMP___(RMM-3),** contains the proposed rates and revisions for Tariff Schedule 94.

Customer Class	**Proposed Percentage Change**
Residential	
Schedules 1, 2, 2E, 3	1.7%
General Service	
Schedule 23	1.8%
Schedule 6	2.1%
Schedule 8	2.3%
Schedule 9	0.7%

Irrigation	
Schedule 10	2.2%
Public Street and Area Lighting Schedules	
Schedules 7, 11, 12	1.4%
Schedule 15T	1.7%
Schedule 15M	3.1%

Rocky Mountain Power respectfully requests that the Commission:

1. Issue a notice of scheduling conference so parties may confer on a procedural schedule including a hearing date for approval of an interim rate change.

2. Approve rates in Tariff Schedule 94 to recover the costs identified in this Application, as filed, over a 12-month period, with an effective date on an interim basis of July 1, 2025 through June 30, 2026.

DATED this 1st day of May, 2025.

Respectfully submitted,

ROCKY MOUNTAIN POWER

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