Rocky Mountain Power
Docket No. 25-035-61
Witness: Kenneth Lee Elder, Jr.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Direct Testimony of Kenneth Lee Elder, Jr.

November 2025

Q. Please state your name, business address, and present position with PacifiCorp d/b/a Rocky Mountain Power ("PacifiCorp" or "Company").

A. My name is Kenneth Lee Elder, Jr. My business address is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232. My present position is Director, Pricing and Tariff Policy.

I. QUALIFICATIONS

Q. Please describe your education and professional background.

A. I have a Bachelor's Degree in Agriculture Business from Tarleton State University and a Master's Degree in Agricultural and Resource Economics from Colorado State University. I have been employed by PacifiCorp since July 2016, where I have managed load forecasting and load research. From 2008 through 2016, I was an economist for a natural resource consulting firm. From 2004 through 2008, I was an economist for the University of Alaska Fairbanks. In May 2025, I assumed my current position.

Q. What are your responsibilities?

A. I am responsible for regulated retail rates and cost of service analysis in the Company's six state service territory.

Q. Have you testified in previous regulatory proceedings?

A. Yes. I have previously filed testimony on behalf of the Company in regulatory proceedings in Utah, Oregon, Wyoming and Washington.

II. PURPOSE AND SUMMARY OF TESTIMONY

Q. What is the purpose of your testimony in this proceeding?

A. The purpose of my testimony is to present the Company's proposed new Schedule 96,

Fire Fund Adjustment, to collect the Utah Fire Fund set forth in Utah Code §54-24-301 and the corresponding rate spread and rate design for this schedule.

III. FIRE FUND ADJUSTMENT – PROPOSED SCHEDULE 96

Q. What is the Fire Fund Adjustment ("FFA")?

A. As explained in the testimony of Company witness Joelle R. Steward, the Company proposes to establish a Utah Fire Fund (the "Fire Fund") as part of this proceeding. The Company proposes to collect the Fire Fund through a new Schedule 96 – Fire Fund Adjustment ("FFA").

Q. How does the Company propose to allocate the FFA to each customer class?

A. The Fire Fund is intended to serve as a financial backstop to address potential wildfire-related liabilities that could significantly exceed the Company's insurance coverage. Establishing the Fire Fund would create a prudent reserve to cover extraordinary claims and is expected to be viewed favorably by credit rating agencies, thereby supporting the Company's overall financial stability. Because wildfire risk affects all aspects of utility operations, the Company proposes allocating the Fire Fund to each customer class based on an equal percentage of base revenue.

Q. What is the proposed rate design for the FFA?

A. The Company proposes to collect these Fire Fund from customers through a percentage adjustment that would be applied to all base charges including Customer Charges, Power Charges, Facilities Charges, Energy Charges, and Voltage Discounts of the Customer's applicable schedule. The allocation and pricing details for Schedule 96 are provided in Exhibit RMP___(KLE-1).

Q. Has the Company taken into consideration contract provisions that apply to its customers in developing the proposed rate design?

A. Yes. Consistent with the terms of the contract approved by the Public Service Commission of Utah in Docket No. 21-035-69, the proposed FFA rate for Contract Customer 1 is based on the overall percentage increase to tariff customers in Utah.

Q. What are the collection amounts and the impact of the proposed FFA?

A. The Company's proposed FFA would collect approximately $109 million per year, totaling about $1,090 million over ten years. This would result in an increase of approximately 4.48% in current rates for all customers, which translates to about $3.70 per month for an average residential customer. The requested increase is below the maximum rate impacts allowed by state law, specifically Utah Code § 54-24-301(4)(b), which limits fire adjustments approved by the Commission to no more than a 4.95% increase for all customers and no more than $3.70 per month for an average residential customer.

Q. Please describe Exhibit RMP___(KLE-1).

A. Exhibit RMP___(KLE-1) contains the FFA allocation and the price calculation of the proposed Schedule 96.

Q. Please describe Exhibit RMP___(KLE-2).

A. Exhibit RMP___(KLE-2) contains the proposed Schedule 96, the revised Tariff Index B.1 and Schedule 80. The Company requests that the proposed tariffs become effective on May 1, 2026.

Q. Did you include workpapers with this filing?

A. Yes. Workpapers have been included with this filing that detail the calculations shown in my exhibit.

Q. Does this conclude your direct testimony?

A. Yes.

Rocky Mountain Power
Exhibit RMP___(KLE-1)
Docket No. 25-035-61
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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Kenneth Lee Elder, Jr.

Fire Fund Adjustment Allocation and Pricing Details

November 2025

Fire Fund Rate Spread and Rate Design
Rocky Mountain Power
Estimated Effect of Proposed Changes
on Revenues from Electric Sales to Ultimate Consumers in Utah
Base Period 12 Months Ending December 2023
Forecast Period 12 Months Ending December 2025

Line No.	Description	Sch No.	No. of Customer Forecast	MWh Forecast	Revenue Base ($000)	Proposed Schedule 96 Fire Fund Adjustment		
						Rev ($000)	Rate (%)	Avg. Bill
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
	Residential							
1	Residential	1/3	955,431	8,246,235	$943,630	$42,369	4.49%	
2	Res. Optional TOD	2/2E	1,029	13,246	$1,323	$59	4.49%	
3	AGA/Revenue Credit				$37	$0	0.00%	
4	**Total Residential**		956,460	8,259,481	$944,990	$42,428	4.49%	$3.70
	Commercial & Industrial							
5	Gen. Svc. Dist.	6	14,281	6,403,526	$547,706	$24,592	4.49%	
6	Gen. Svc. Dist. Energy TOD	6A	2,827	380,064	$44,064	$1,978	4.49%	
7	*Subtotal Schedule 6*		*17,108*	*6,783,590*	*$591,770*	*$26,570*	*4.49%*	
8	Gen. Svc. Dist. > 1,000 kW	8	223	2,393,014	$179,579	$8,063	4.49%	
9	Gen. Svc. High Voltage	9	164	5,060,524	$292,644	$13,140	4.49%	
10	Gen. Svc. High Voltage, Former Contract 2	9-C2	1	324,160	$18,655	$838	4.49%	
11	Gen. Svc. H.V. Energy TOD	9A	8	45,449	$3,437	$154	4.49%	
12	*Subtotal Schedule 9*		*173*	*5,430,133*	*$314,736*	*$14,132*	*4.49%*	
13	Irrigation	10	3,540	242,214	$19,646	$882	4.49%	
14	Gen. Svc. Dist. Small	23	102,995	1,823,052	$181,236	$8,138	4.49%	
15	Partial Req. Svc. >= 1,000 kW	31	7	319,328	$18,973	$852	4.49%	
16	Svc. From Ren. Ene. Facilities	32-9	3	173,984	$3,850	$173	4.49%	
17	Svc. From Ren. Ene. Facilities	32-6	15	31,451	$1,615	$73	4.49%	
18	Svc. From Ren. Ene. Facilities	32-8	6	69,498	$3,575	$161	4.49%	
19	*Subtotal Schedule 32*		*24*	*274,933*	*$9,040*	*$406*	*4.49%*	
20	Ren. Ene. Pur. for Qlf. Cust, Option 2	34	1	1,236,762	$16,875	$758	4.49%	
21	Contract 1		1	647,000	$40,713	$1,823	4.48%	
22	Contract 3		1	1,339,588	$104,628	$4,698	4.49%	
23	AGA/Revenue Credit				$7,040	$0	0.00%	
24	**Total Commercial & Industrial**		124,073	20,489,616	$1,484,237	$66,322	4.47%	
	Public Street Lighting							
25	Security Area Lighting	7	6,333	10,031	$1,368	$61	4.49%	
26	Street Lighting - Company Owned	11	795	13,419	$3,915	$176	4.49%	
27	Street Lighting - Customer Owned	12	1,331	29,891	$1,491	$67	4.49%	
28	Metered Outdoor Lighting	15	780	15,799	$814	$37	4.49%	
29	Traffic Signal Systems	15	2,738	8,268	$867	$39	4.49%	
30	*Subtotal Public Street Lighting*		11,977	77,407	$8,456	$380	4.49%	
31	Security AR LG-Contracts (PTL)		4	7	$1	$0	0.00%	
32	AGA/Revenue Credit				$5	$0	0.00%	
33	**Total Public Street Lighting**		11,981	77,415	$8,461	$380	4.49%	
34	**Total Sales to Ultimate Customers**		1,092,514	28,826,512	$2,437,689	$109,130	4.48%	

Rocky Mountain Power
Exhibit RMP___(KLE-2)
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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF UTAH

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Kenneth Lee Elder, Jr.

Proposed Tariffs

November 2025

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

P.S.C.U. No. 52

First Revision of Sheet No. B.1
Canceling Original Sheet No. B.1

ELECTRIC SERVICE SCHEDULES
STATE OF UTAH

Schedule No.		Sheet No.
80	Summary of Effective Rate Adjustments	80
91	Surcharge To Fund Low Income Residential Lifeline Program	91
94	Energy Balancing Account (EBA)	94.1 - 94.11
96	Fire Fund Adjustment	96
97	Wildfire Mitigation Balancing Account	97
98	REC Revenue Adjustment	98
105	Irrigation Load Control Program	105.1 - 105.2
107	Solar Incentive Program	107.1 - 107.6
111	Residential Energy Efficiency	111.1 - 111.5
114	Air Conditioner Direct Load Control Program (Cool Keeper Program)	114.1 - 114.2
118	Low Income Weatherization	118.1 - 118.6
120	Plug-In Electric Vehicle Incentive Pilot Program	120.1 - 120.3
121	Plug-In Electric Vehicle Load Research Study Program – Temporary	121.1 - 121.2
135	Net Metering Service*	135.1 - 135.6
136	Transition Program for Customer Generators*	136.1 - 136.6
137	Net Billing Service	137.1 - 137.5
140	Non-Residential Energy Efficiency	140.1 - 140.9
193	Demand Side Management (DSM) Cost Adjustment	193.1 - 193.2
194	Demand Side Management (DSM) Credit	194.1
197	Federal Tax Act Adjustment	197.1
198	Electric Vehicle Infrastructure Program (EVIP) Cost Adjustment	198.1 – 198.2
299	Billing for Other Entities	299.1 - 299.3
300	Regulation Charges	300.1 - 300.4

Schedule Numbers not listed are not currently used.
*These Schedules are not available to new customers or premises.

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ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

P.S.C.U. No. 52

First Revision of Sheet No. 80
Canceling Original Sheet No. 80

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 80

STATE OF UTAH

Summary of Effective Rate Adjustments

The following summarizes the applicability of the Company's adjustment schedules.

Schedule	91	94	96	97	98	193	198
1	X	x	x	x	x	x	x
2	X	x	x	x	x	x	x
2E	X	x	x	x	x	x	x
3		x	x	x	x	x	x
6	X	x	x	x	x	x	x
6A	X	x	x	x	x	x	x
7	X	x	x	x	x	x	x
8	X	x	x	x	x	x	x
9	X	x	x	x	x	x	x
9A	X	x	x	x	x	x	x
10	X	x	x	x	x	x	x
11	X	x	x	x	x	x	x
12	X	x	x	x	x	x	x
15	X	x	x	x	x	x	x
23	X	x	x	x	x	x	x
31	X	x	x	x	x	x	x
32	X	x	x	x	x	x	x

The x's in each column indicate that the Schedule is subject to the rate adjustments set forth in tariff schedules 91, 94, 96, 97, 98, 193, and 198.

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

First Revision of Sheet No. B.1
P.S.C.U. No. 52 **Canceling Original Sheet No. B.1**

ELECTRIC SERVICE SCHEDULES
STATE OF UTAH

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ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

P.S.C.U. No. 52

First Revision of Sheet No. 80
Canceling Original Sheet No. 80

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 80

STATE OF UTAH

Summary of Effective Rate Adjustments

The following summarizes the applicability of the Company's adjustment schedules.

Schedule	91	94	96	97	98	193	198
1	X	x	x	x	x	x	x
2	X	x	x	x	x	x	x
2E	X	x	x	x	x	x	x
3		x	x	x	x	x	x
6	X	x	x	x	x	x	x
6A	X	x	x	x	x	x	x
7	X	x	x	x	x	x	x
8	X	x	x	x	x	x	x
9	X	x	x	x	x	x	x
9A	X	x	x	x	x	x	x
10	X	x	x	x	x	x	x
11	X	x	x	x	x	x	x
12	X	x	x	x	x	x	x
15	X	x	x	x	x	x	x
23	X	x	x	x	x	x	x
31	X	x	x	x	x	x	x
32	X	x	x	x	x	x	x

The x's in each column indicate that the Schedule is subject to the rate adjustments set forth in tariff schedules 91, 94, 96, 97, 98, 193, and 198.

ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

P.S.C.U. No. 52 **Original Sheet No. 96**

ROCKY MOUNTAIN POWER

ELECTRIC SERVICE SCHEDULE NO. 96

STATE OF UTAH

Fire Fund Adjustment

PURPOSE: This Schedule is designed to collect the Utah Fire Fund set forth in Utah Code §54-24-301.

APPLICATION: This Schedule shall be applicable to all retail tariff Customers taking service under the terms contained in this Tariff.

TERM: The term of this Schedule shall be from May 1, 2026 until April 30, 2036.

MONTHLY BILL: In addition to the Monthly Charges contained in the Customer's applicable schedule, all monthly bills shall have the following percentage adjustments applied to the Monthly Customer Charges, Power Charges, Facilities Charges, Energy Charges, and Voltage Discounts of the Customer's applicable schedule.

Schedule 1	4.48%
Schedule 2	4.48%
Schedule 2E	4.48%
Schedule 3	4.48%
Schedule 6	4.48%
Schedule 6A	4.48%
Schedule 7*	4.48%
Schedule 8	4.48%
Schedule 9	4.48%
Schedule 9A	4.48%
Schedule 10	4.48%
Schedule 11*	4.48%
Schedule 12*	4.48%
Schedule 15 (Traffic and Other Signal Systems)	4.48%
Schedule 15 (Metered Outdoor Nighttime Lighting)	4.48%
Schedule 23	4.48%
Schedule 31	4.48%
Schedule 32	4.48%
Schedule 34	4.48%

* The rate for Schedules 7, 11 and 12 shall be applied to the Charge per Lamp.