ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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

February 10, 2026

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

RE: **Docket No. 26-035-05 - In the Matter of the Application of Rocky Mountain Power for Approval of Large-Load Service Contract Between PacifiCorp and a Large-Load Customer**
Rocky Mountain Power's Application

Pursuant to Utah Code § 54-26-301 and Utah Administrative Code R746-318-201, PacifiCorp d/b/a Rocky Mountain Power ("Rocky Mountain Power" or the "Company") hereby submits this application ("Application") requesting an order from the Public Service Commission of Utah ("Commission") approving the large-load service contract between Rocky Mountain Power and a large load customer as that term is defined in Utah Code § 54-26-101.

The Company's Application is accompanied by the direct testimonies, exhibits and workpapers of Messrs. Craig M. Eller, Thomas R. Burns and Ramon J. Mitchell. The Company has identified confidential and highly confidential information throughout the filing. Confidential information is provided pursuant to the procedures set forth in R746-1-601 and 602. Highly confidential information is restricted to regulator access only pursuant to R746-318-103(2). The Company has uploaded the following unredacted highly confidential files to the Commission's SFTP site:

- Direct Testimony of Craig M. Eller HIGHLY CONFIDENTIAL
  - Exhibit RMP__(CME-1) – Large Load Service Contract HIGHLY CONFIDENTIAL
  - Exhibit RMP__(CME-2) – System Impact Study HIGHLY CONFIDENTIAL
  - Exhibit RMP__(CME-3) – Large Load Construction Agreement HIGHLY CONFIDENTIAL
  - Eller workpaper (1 excel file) HIGHLY CONFIDENTIAL
- Direct Testimony of Thomas R. Burns HIGHLY CONFIDENTIAL
  - Burns workpapers (4 Excel files) HIGHLY CONFIDENTIAL
- Direct Testimony of Ramon J. Mitchell HIGHLY CONFIDENTIAL

The Company has also uploaded a confidential version of the files, where applicable, to the Commission's SFTP site. In the confidential versions, highly confidential information is redacted

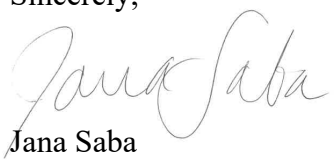
and confidential information is unredacted. The confidential version will be provided to a party that is granted intervention in this proceeding and executes a non-disclosure agreement.

- Direct Testimony of Craig M. Eller CONFIDENTIAL
- Direct Testimony of Thomas R. Burns CONFIDENTIAL
- Direct Testimony of Ramon J. Mitchell CONFIDENTIAL

The Company notes that Utah Code Ann. § 54-26-302(4) requires the Commission to issue an order within 60 days of filing. Given the compressed timeframe, the Company's Application presents a proposed procedural schedule, which was developed in coordination with the Division of Public Utilities and Office of Consumer Services.

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

Sincerely,



Jana Saba
Director, Regulatory Affairs

CERTIFICATE OF SERVICE

Docket No. 26-035-05

I hereby certify that on February 10, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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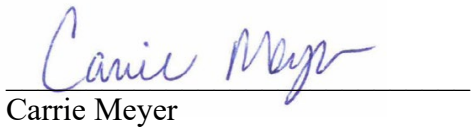

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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Application of Rocky Mountain Power for Approval of Large-Load Service Contract Between PacifiCorp and a Large-Load Customer	Docket No. 26-035-05 **APPLICATION**

PacifiCorp d/b/a Rocky Mountain Power ("Rocky Mountain Power" or the "Company") hereby submits this application ("Application") for an order from the Public Service Commission of Utah ("Commission") approving the large-load service contract ("Proposed LLSC") between Rocky Mountain Power and a large-load customer ("Customer"). Customer is a large load customer as defined in Utah Code § 54-26-101, and the Company is making this Application pursuant to Utah Code § 54-26-301 and Utah Administrative Code R746-318-201. Pursuant to the Proposed LLSC, the Company will provide all of Customer's electric service requirements, which exceed 100 megawatts ("MW"), and will be the exclusive provider of energy service to Customer's facility in Utah.

As this Application and the supporting testimonies filed herewith demonstrate, the Proposed LLSC complies with the requirements of Utah Code Title 54 Chapter 26 ("Large Load Act"), and Utah Administrative Code R746-318 et seq. ("Large Load Rules"); Customer will

bear all just and reasonable incremental costs attributable to receiving electric service under the Proposed LLSC; and the Company's existing ratepayers will not bear any costs that are justly and reasonably attributable to Customer. In fact, existing customers will benefit from the Proposed LLSC, as revenues from the agreement will be shared with retail customers through credits to be paid by Customer and applied to customer rates through the general rate case and Utah Energy Balancing Account.

In support of this Application, the Company states as follows:

1. PacifiCorp is an Oregon corporation that provides electric service to customers in the states of Utah, Wyoming, and Idaho through its Rocky Mountain Power division. Rocky Mountain Power is a public utility in the state of Utah and is subject to the jurisdiction of the Commission with respect to its rates and service.

2. Communications regarding this Application should be sent to:

Max Backlund
Utah Regulatory Affairs Manager
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tiffanie.ellis-burke@pacificorp.com

In addition, the Company respectfully requests that all data requests regarding this matter be addressed to:

By e-mail (preferred): datarequest@pacificorp.com

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

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

I. BACKGROUND

3. A large load customer made a large-scale service request prior to May 7, 2025. The Company subsequently completed a system impact study and associated designated network load study to determine the necessary infrastructure, costs, and timeline to serve the request at the site.

4. The Company determined it could serve the requested load, which exceeds 100 MW, at the site.

5. On January 20, 2026, the Company and Customer executed the Proposed LLSC, pursuant to which the Company will provide electric service to meet all of Customer's projected electrical requirements at the site.

6. A copy of the Proposed LLSC is being provided as Regulatory Access Only – Highly Confidential – Subject to Utah Public Service Commission Rule 746-318-103, RMP___(CME-1) to the Direct Testimony of Craig M. Eller.

7. The Proposed LLSC satisfies both the statutory and administrative requirements for large load contracts set forth under Utah Annotated Code §§ 54-26-101 through 54-26-901 and Utah Administrative Rules R746-318, Large Scale Electric Requirements, effective January 1, 2026.

8. Consistent with Utah Code § 54-26-301(8), the Proposed LLSC is being filed for Commission approval within 15 business days of execution.

9. As demonstrated in this Application and supporting testimony, the Proposed LLSC satisfies this requirement.

10. To support this Application and as evidence that the Proposed LLSC meets these requirements, the Company is submitting the following supporting confidential testimonies:

- **Craig M. Eller**, Senior Vice President, Business Development and Customer Experience for the Company, describes the Proposed LLSC and demonstrates that it satisfies the statutory requirements for large load contract;
- **Ramon J. Mitchell**, Managing Director, Energy Supply Management Finance and Net Power Costs, describes the Company's proposal for maintaining separate accounting records to demonstrate that incremental costs associated with this Application are directly assigned to the large load customer; and
- **Thomas R. Burns**, Vice President, Resource Planning and Acquisitions, demonstrates that the Company's resource portfolio, factoring in the proposed load service and the additional resources and market purchases needed to provide that service, will be as reliable as the 2025 IRP preferred portfolio and that increased system costs will be less than revenues received from Customer during the term of the Proposed LLSC.

11. As this Application and the attached testimony demonstrate, the terms of the Proposed LLSC are just and reasonable, consistent with statutory and administrative requirements for large load contracts and are expected to result in benefits to the Company's existing ratepayers over the life of the agreement. Because the Proposed LLSC satisfies all statutory and regulatory requirements and presents a material benefit to Utah customers, the Company requests the Commission approve the Proposed LLSC.

II. LEGAL STANDARD

12. In March 2025, the Utah Legislature enacted Senate Bill 132 ("SB 132"), which created requirements for providing electrical service to large-scale electrical loads. SB 132 was

intended to address the Legislature's policy objective of attracting new large load investments to the State of Utah and capturing economic benefits of such investments for Utah citizens. SB 132, now the Large Load Act, was codified in Utah Code title 54 chapter 26 and took effect in May 2025.

13. The Large Load Act provides a mechanism whereby large load customers can request service from Rocky Mountain Power, as a qualified electric utility, or a large-scale generation provider, and enter a "large load service contract."[1]

14. The Large Load Act also sets out requirements for large load service contracts that require transmission service, including that the large load customer shall bear all costs for interconnection and transmission-related studies; interconnection upgrades, transmission upgrades, network upgrades, distribution system upgrades, or system upgrades; transmission service rates in the transmission provider's open access transmission tariff ("OATT"); ancillary services; balancing services; and backup services. These costs must be borne by the customer to the fullest extent allowable under applicable federal law and regulations.[2]

15. To ensure retail ratepayers do not bear costs attributable to the large load customer or for transmission upgrades appropriately allocated to the large load customer, the Large Load Act requires the Company to maintain separate accounting records and take reasonable measures to ensure costs are properly allocated.[3]

16. Upon execution of a contract with a large load customer, Rocky Mountain Power must file an application to the Commission for review and approval of the contract within 15 business days of execution of the contract.[4]

[1] Utah Code Ann. § 54-26-201.
[2] Utah Code § 54-26-503.
[3] Utah Code § 54-26-601.
[4] *See* Utah Code Ann. § 54-26-302; Utah Public Service Commission Rule 746-318-201(1) and (2).

17. An application for approval of a large load contract must (1) provide evidence that demonstrates the customer meets the statutory definition and all other requirements of a large load customer in the Large Load Act; (2) attach a copy of the large load contract, appropriately redacted consistent with the Large Load Rules; (3) provide a description of how the proposed use will impact the Company's system; and (4) provide information describing the incremental costs necessary to serve the customer as described in Utah Public Service Commission Rule 746-318-201(4)(d).

18. The Commission must approve the submitted application if it finds, by a preponderance of the evidence, that the contract complies with the regulatory and statutory requirements, that "the large load customer bears all just and reasonable incremental costs attributable to receiving the requested electric service," and that the utility's existing ratepayers will not "bear costs justly and reasonably attributable to providing electric service for the large load customer."[5]

19. The Proposed LLSC is a "large load contract" because the contract involves a request for new electric service with a cumulative demand of 100 MW or greater and the Proposed LLSC is with a qualified electric utility, the Company.[6] Accordingly, the Company provides the following information and attached exhibit for the Commission's review and approval.

III. SUMMARY OF PROPOSED LLSC

20. Under the Proposed LLSC, the Company has agreed to provide full-requirements retail service to Customer for an initial term and year-to-year thereafter until

[5] Utah Code Ann. § 54-26-302(2); Utah Public Service Commission Rule 746-318-202.
[6] Utah Code Ann. § 54-26-101(12).

either party terminates the Proposed LLSC. The Company will be the exclusive service provider of electricity to Customer's facility.

21. If the Proposed LLSC is granted, the Company will provide Customer more than 100 MW of firm service.

22. The Company will design, construct, install, and operate certain service improvements for delivery to Customer, which the Company will own, lease, or contract for the duration of Proposed LLSC term. And the Company will procure the generation assets necessary to provide Customer's requested service.

23. Delivery facilities have been fully paid for and were completed on/before December 31, 2025. No network transmission upgrades are required to accommodate the load service.

24. The Company will initially procure sufficient generation through market purchases in the summers of 2026 and 2027. Thereafter, the Company will procure adequate resource capacity for the remainder of the Proposed LLSC. Company witness Mr. Burns discusses the Company's modeling of these additional resources and the impacts on the reliability and cost effectiveness of the Company's system with these proposed resources as compared to the 2025 IRP.

25. Customer will pay the Company a monthly Reservation Charge, Energy Charges associated with usage, and applicable surcharges and taxes. Through this structure, Customer will reimburse the Company for all costs associated with providing electric power intended to meet Customer's demand.

26. The Reservation Charge is a fixed-cost charge to compensate the Company for the costs of its investments and service to Customer. The revenue from the Reservation Charge

will be removed from the Company's revenue requirement and net power costs. In addition, the costs of the Customer load facilities, bridging market capacity purchases, incremental generation resources, and the Company's return will be removed from revenue requirements to prevent any subsidization from existing customers. The Energy Charge will result in a benefit to existing customers, as described by Company witness Mr. Eller. The applicable surcharges and taxes are based on their established rates and will result in benefits to existing customers and Utah residents, as described by Company witness Mr. Eller.

27. The Company's other customers are expected to benefit from this transaction in several ways. First, all Company customers will benefit from the economic re-dispatch of the system. Second, Utah customers will benefit from Customer contributions to applicable surcharges and riders. Third, Utah residents and the state will benefit from state and local tax revenue through the contract term. The Company will share these benefits with its customers while taking the steps described herein to protect customers from the costs and risks of the transaction. Company witness Mr. Eller discusses these customer benefits in detail in his Direct Testimony.

IV. IMPACT ON ROCKY MOUNTAIN POWER'S SYSTEM

28. The impacts on the Company's system were identified through a system impact study, which assessed the impact of then-planned load on the system.

29. The system impact study identified the interconnection upgrades and direct assigned all costs to the requesting customer. The system impact study and associated designated network load study found that no further transmission or distribution upgrades were required to provide service in excess of 100 MW to the site.

30. The Company will be using its Network Integration Transmission Service ("NITS") to serve the Customer's facilities, which will be designated as a network load. Any transmission voltage-related contribution from the Customer can be viewed as a pure cost offset to existing retail customers.

31. There will be some shared facilities costs, of which Customer agrees to pay its proportionate share based on the full amount of its contracted demand.

V. LARGE LOAD INCREMENTAL COSTS

32. By design the Proposed LLSC ensures that existing customers are either held harmless or will benefit from the Company's service to Customer through the Reservation and Energy Charges, applicable surcharges and riders, and additional payment of incremental costs.

33. In addition to the Reservation and Energy Charges, Customer will reimburse the Company for all incremental costs of serving Customer's load.

34. The Proposed LLSC presents several categories of incremental costs. They include incremental energy costs used by the Customer facilities, incremental interconnection costs used by the Customer facilities, and incremental capacity-related costs, including costs for offsetting peak demand, ancillary services, supplying reserves, resource adequacy, and resource sufficiency.

35. The Company will use its point of metering at the Customer premises for billing of all firm power and energy to be delivered to the facilities, as well as surcharges and riders.

36. Because the meter will be beyond the point of delivery, transformers and other losses occurring between the point of delivery and the meter will be computed and added to the meter readings to determine the demand and energy consumption.

VI. METHODOLOGY FOR EXCLUDING INCREMENTAL COSTS FROM RETAIL RATES

37. The Company has developed a methodology for maintaining separate accounting records with sufficient detail to demonstrate that costs will be directly assigned to Customer. By applying this methodology, the Company will protect existing retail customers from subsidizing Customer's energy, capacity and transmission costs. Company witness Mr. Mitchell discusses these accounting methodologies in detail in his Direct Testimony.

38. Although the methodology for maintaining distinct accounting records differs slightly across the different types of incremental costs, generally the Company will track all charges at a granular level and will make all records available for audit and review by the Commission in its discretion.

39. Additionally, the Company will make a credit toward the cost of service in each rate case equal to the amount of the Energy Charge to be applied to the total forecasted Customer energy charge against the forecasted net power costs. This credit will help offset the incremental costs associated with Customer's energy usage, ensuring that these costs are removed from the net power cost calculation used to set rates for other customers. Similarly, in Utah Energy Balancing Account filings, the Company will apply a credit equal to the actual Customer invoiced energy charge against the actual net power costs. This will help ensure that the incremental costs related to meeting Customer's load are excluded from the EBA recovery mechanism, so that other customers do not bear any portion of these costs.

40. The Company will manage costs associated with capacity and related charges by procuring market energy initially but within two years will procure resources to increase overall system capacity so the Company can reliably serve all customers. The costs for these resources will be excluded from the cost of service and net power cost forecasts in general rate

cases and will not be included in the actual cost of service in the Utah Energy Balancing Account. This will help ensure that existing customers do not bear any portion of these incremental costs.

41. The result of these practices will be a verifiable accounting of costs incurred because of the Proposed LLSC and a process that ensures Customer bears those costs. The credits will ultimately result in an overall cumulative benefit to existing retail customers. However, should payments be insufficient to cover the Company's actual cost, existing customers will be held harmless, and any revenue shortage will remain excluded from the Utah Energy Balancing Account and General Rate Cases.

VII. ADDITIONAL OBLIGATIONS OF CUSTOMER

42. In addition to the requirements and payments discussed above, Customer is also obligated to comply with the Company's tariffs, procedures, specifications, and requirements, and to provide certain assurances to shield the Company and its customers from financial and other risks.

43. In particular, Customer agrees to indemnify, defend, and hold harmless the Company against claims, demands, suits, losses, costs, and damages. It also agrees to carry qualifying insurance coverage as outlined in the Proposed LLSC and provide certificates of insurance when the Company requires.

44. Customer will meet the credit requirements or provide credit assurances as set forth in the Proposed LLSC, will bear the costs associated with such compliance, and must provide audited financial statements to the Company upon request.

45. Customer agrees to take service only from the Company and to isolate itself from any newly installed connected or closed private generation systems. Customer also agrees it will notify the Company of its intent to increase its electric consumption or to make any

significant change in load characteristics or installations in a manner that would exceed the demand specific in the Proposed LLSC or that could impact the Company's electric system. Customer agrees to provide the Company an opportunity to serve that new load. If the Company elects not to, or is unable to serve the customers' new load, Customer may seek service from a connected or closed private generation system but must do so in a manner that is electrically isolated from the Company's system and other facilities at or behind the meter.

VIII. COMPLIANCE WITH LARGE LOAD ADMINISTRATIVE RULES

46. The Proposed LLSC complies with the Utah Administrative Rules R746-318, Large Scale Electric Requirements, effective January 1, 2026. The testimonies of Messrs. Eller, Mitchell, and Burns address the regulatory requirements, as follows:

47. As required by R746-318-20(1), Mr. Eller's testimony attaches a full and unredacted copy of the Proposed LLSC marked Regulator Access Only—Highly Confidential, as permitted by R746-318-103.

a) Mr. Eller's testimony also includes evidence that Customer meets the Large-Scale Electric Service Requirements, R746-318-201(4)(a); information describing the large load incremental costs necessary for Customer to receive electric service, including each category of costs set out in the rule, R746-318-201(4)(d); and information regarding Customer's transmission costs, R746-318-301(3).

b) Mr. Burns' testimony provides a description of how the Proposed LLSC will impact the Company's system, R746-318-201(4)(c).

c) Mr. Mitchell's testimony provides the Company's methodology for maintaining separate accounting records with sufficient detail to demonstrate that costs will be directly assigned to the large load customer, R746-318-201(6), and the method by which costs for the provision of electric service under the Proposed LLSC will be

excluded from rates paid by retail customers, Utah Code § 54-26-602(4)(c) and R746-318-201(7).

IX. PROCEDURAL SCHEDULE

48. Utah Code Ann. § 54-26-302(4) requires the Commission to issue an order within 60 days of filing. Given the compressed timeframe, the Company developed a proposed procedural schedule in coordination with the Division of Public Utilities ("Division") and Office of Consumer Services ("Office"). The Company proposes the Commission set a schedule as follows: Non-Applicant Direct Testimony due March 3, 2026; all-party rebuttal testimony due March 10, 2026; a hearing on March 17, 2026; and discovery turnaround of five calendar days. The Division and Office have given the Company permission to represent that they support this procedural schedule.

X. CONCLUSION

49. Requirements of the Large Load Act and Large Load Rules are addressed in Direct Testimonies of Company witnesses Mr. Eller, Mr. Mitchell, and Mr. Burns.

50. The prices, terms, and conditions of the Proposed LLSC are consistent with the Large Load Act.

51. The Customer bears all just and reasonable, incremental costs attributable to receiving the requested electric service.

52. The Proposed LLSC satisfies all applicable requirements for large-load contracts under Large Load Act and Large Load Rules.

53. Commission approval will serve the public interest by facilitating large load development and securing beneficial revenues for the Company's retail customers, while ensuring that existing ratepayers share no portion of the incremental costs associated with the Proposed LLSC.

54. The Company seeks the Commission's approval of the Proposed LLSC and respectfully requests the Commission adopt the proposed procedural schedule to facilitate the 60-day timeframe set out in Utah Code Ann. § 54-26-302.

WHEREFORE, the Company respectfully requests that the Commission issue an order:

a. Issue a Scheduling Order that reflects the procedural schedule proposed herein;

b. Issue an order within 60 days that includes a finding that the terms and conditions of the Proposed LLSC to be just, reasonable, and in the public interest;

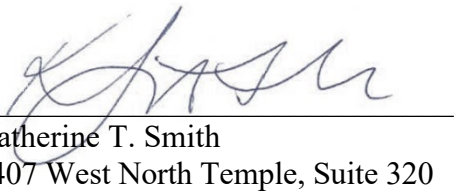
c. Approving the Parties' Proposed LLSC, as executed January 20, 2026; and

d. Granting such other and further relief as the Commission may deem just and proper.

DATED this 10th day of February, 2026.

Respectfully submitted,

ROCKY MOUNTAIN POWER



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Attorney for Rocky Mountain Power