ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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

March 13, 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. 26-035-11 – In the Matter of Rocky Mountain Power's Application to Revise Tariff Schedule 98, Renewable Energy Credits Balancing Account

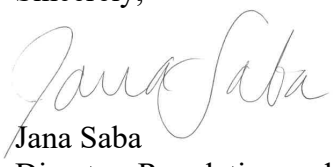
Consistent with Utah Public Service Commission Rule 746-1-203, Rocky Mountain Power ("Company") submits its Application to Revise Tariff Schedule 98, Renewable Energy Credits Balancing Account. The Application is accompanied by the following testimony, exhibits and workpapers.

- Direct testimony of Marcelina R. Hundis
  - Confidential Hundis Exhibits:
    - Confidential Exhibit RMP__(MRH-1)
    - Confidential Exhibit RMP__(MRH-2)
    - Confidential Exhibit RMP__(MRH-3)
    - Confidential Exhibit RMP__(MRH-4)
  - Confidential Hundis workpaper in Excel file format
- Direct testimony of Nicholas L. Highsmith
  - Highsmith Exhibits:
    - Exhibit RMP__(NLH-1)
    - Exhibit RMP__(NLH-2)
  - Highsmith workpaper in Excel file format
- Direct testimony of Kenneth Lee Elder, Jr.
  - Elder Exhibits:
    - Exhibit RMP__(KLE-1)
    - Exhibit RMP__(KLE-2)
    - Exhibit RMP__(KLE-3)
  - Elder workpaper in Excel file format

Confidential information is provided subject to R746-1-602 and 603 of the Public Service Commission of Utah Rules. Pursuant to Commission Rule R746-405-2D, PacifiCorp states that the proposed tariff sheet contained in Exhibit RMP__(KLE-3) do not violate state law or Commission rule.

Informal inquiries may be directed to Max Backlund at max.backlund@pacificorp.com.

Sincerely,



Jana Saba
Director, Regulation and Regulatory Affairs

CERTIFICATE OF SERVICE

Docket No. 26-035-11

I hereby certify that on March 13, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of Rocky Mountain Power's Application for Authority to Revise Tariff Schedule 98, Renewable Energy Credits Balancing Account	DOCKET NO. 26-035-11 **APPLICATION**

PacifiCorp d/b/a Rocky Mountain Power ("Rocky Mountain Power" or "Company") respectfully requests the Public Service Commission of Utah ("Commission") approve the Company's Application to Revise Tariff Schedule 98 ("Application"), the Renewable Energy Credits ("RECs") Balancing Account ("RBA"). This Application is supported by the following:

1. Rocky Mountain Power is a division of PacifiCorp, an Oregon corporation, that provides electric service to retail customers in the states of Idaho, Wyoming, and Utah, and to the states of Oregon, California, and Washington as Pacific Power. Rocky Mountain Power is a regulated public utility in Utah and is subject to the Commission's jurisdiction for retail electric rates and service conditions. The Company provides retail electric service to over 1,000,000 customers and has approximately 1,800 employees in Utah. Rocky Mountain Power's principal place of business in Utah is 1407 West North Temple, Suite 310, Salt Lake City, Utah 84116.

2. Communications regarding this filing should be addressed to:

Max Backlund
Rocky Mountain Power
1407 West North Temple, Suite 310
Salt Lake City, Utah 84116
Telephone: (801) 220-3121
E-mail: max.backlund@pacificorp.com

Katherine T. Smith
Rocky Mountain Power
1407 West North Temple, Suite 320
Salt Lake City, Utah 84116
Telephone: (435) 776-6980
E-mail: katherine.smith@pacificorp.com

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

By email (preferred): datarequest@pacificorp.com
katherine.smith@pacificorp.com
max.backlund@pacificorp.com

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

Informal questions may be directed to Max Backlund, State Regulatory Affairs Manager for Utah at max.backlund@pacificorp.com.

3. The Commission first approved Tariff Schedule 98 in 2011.[1] This Tariff tracks the difference between REC revenues included in base rates, and actual REC revenues collected from the Company's sale of RECs. The difference between REC revenues in rates, and from RECs sold by the Company, are tracked and deferred each month from January 1 to December 31 of each

[1] *In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations,* Docket No. 10-035-124, Report and Order (Sept. 13, 2011).

calendar year ("Deferral Period"). The Company files an annual application in March to true-up the difference, including application carrying charges, between base rates and actual REC sales in each Deferral Period. Rates are adjusted each year to account for any over- or under-collections during the Deferral Period.

4. The Company is proposing to refund approximately $11.8 million from the 2025 Deferral Period. This is approximately $3.0 million more than the refund level approved in RBA ("Schedule 98").[2] The Company proposes to refund this $11.8 million over 12 months, beginning June 1, 2026.

5. This Application includes the testimony and exhibits of Ms. Marcelina R. Hundis, Senior Environmental Commodity Trader for Energy Supply Management; Mr. Nicholas L. Highsmith, Revenue Requirement Manager; and Mr. Kenneth Lee Elder, Jr., Director of Pricing and Tariff Policy. Ms. Hundis discusses historical REC sales that inform the Schedule 98 rate. Mr. Highsmith discusses the allocation of total-Company sales to Utah and calculates the deferral to true-up calendar year 2025 REC sales. Mr. Elder discusses the Company's proposed REC revenue spread and RBA rates in this case.

6. Ms. Hundis' testimony discusses the Company's total 2025 REC revenues. **Confidential Exhibit RMP___(MRH-1)** contains a summary table of actual REC revenues by month and by resource for calendar year 2025, excluding certain revenue from REC's sold to Kennecott Utah Copper ("Kennecott"), Leaning Juniper Wind Wake Loss and the Pryor Mountain wind project. **Confidential Exhibit RMP___(MRH-2)** summarizes actual REC sales by entity, tag price, resource, and vintage for calendar year 2025. **Confidential Exhibit RMP___(MRH-3)** details the final November and December 2024 actual REC revenues by resource. **Confidential**

[2] *In the Matter of Rocky Mountain Power's Application for Authority to Revise Tariff Schedule 98, Renewable Energy Credits Balancing Account*, Docket No. 25-035-13, Order Setting Final Rates (Sept. 19, 2025).

Exhibit RMP___(MRH-4) details the RECs transferred to Kennecott under the Non-Generation and REC Supply Agreement between the Company and Kennecott ("Kennecott Agreement").[3]

7. Mr. Highsmith's testimony provides the detail for the $11.8 million balance in the Deferral Period. **Exhibit RMP___(NLH-1)** summarizes, on a Utah-allocated basis, the 2025 Deferral Period. This includes: the approximate $9.2 million beginning balance rolled over from the previous 2024 Deferral Period; approximately $14.9 million in revenue from the sale of RECs; a $1.5 million incentive of ten (10) percent of total REC revenue;[4] $1 million in total revenue associated with the Kennecott Agreement, Leaning Juniper Wind Wake loss, and sale of Pryor Mountain RECs; compared to $1.1 million of REC revenue set in base rates,[5] and $11.7 million in credits resulting from the 2025 RBA. This results in an overall $11.8 million Deferral Period amount that should be refunded to customers, including approximately $993 thousand in carrying charges at the applicable carrying charger rate. **Exhibit RMP___(NLH-2)** provides the detail of the monthly deferral calculation and the allocation of REC revenue to Utah.

8. Mr. Elder's testimony discusses the Company's proposed rate spread and proposes to allocate the Deferral Period refund across customer classes based on a cost of service factor 10 allocation. The Company's proposed rate spread in found in **Exhibit RMP___(KLE-1)**, billing determinants and calculations of proposed rates in this case are found in **Exhibit RMP___(KLE-2)**, and the proposed rates for Schedule 98 are found in **Exhibit RMP___(KLE-3)**. Current

[3] *In the Matter of Rocky Mountain Power's Application for Approval of the Non-Generation and Renewable Energy Credit Supply Agreement between PacifiCorp and Kennecott Utah Copper LLC*, Docket No. 19-035-20, Order Approving a Non-Generation and Renewable Energy Credit Supply Agreement, (Aug. 7, 2019).
[4] *In the Matter of the Application of Rocky Mountain Power for Authority to increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations, Docket No. 11-035-200, Report and Order* (Sept. 19, 2012) (approving 10 percent incentive); See also *Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations,* Docket No. 20-035-04, Order (Dec. 30, 2020) ("Rocky Mountain Power's 2020 Utah GRC") (reauthorizing 10 percent incentive).
[5] Rocky Mountain Power's 2020 Utah GRC*,* Docket No. 20-035-04, Order (Dec. 30, 2020) (establishing base rates for the sale of RECs).

Schedule 98 rates will terminate on May 31, 2026, and the new Tariff Schedule 98 rates will become effective on June 1, 2026. The Company's proposed refunds per customer class are reflective in the table below.

Tabe 1 – Refunds per Customer Class Schedules

Residential	
Schedules 1, 2, 3	$4,388,634
General Service	
Schedule 23	$868,469
Schedule 6	$3,060,039
Schedule 8	$926,925
Schedule 9	$2,135,192
Irrigation	
Schedule 10	$91,172
Public Street and Area Lighting	
Schedules 7, 11, 12	$8,235
Schedule 15	$5,888

CONCLUSION

Rocky Mountain Power respectfully requests the Commission approve the Company's Application, and refund approximately $11.8 million to customers on an interim basis, effective June 1, 2026.

DATED this 13th day of March, 2026.

ROCKY MOUNTAIN POWER

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Attorney for Rocky Mountain Power