

Docket No. 20000-__-EM-24
Witness: Aaron J. Rose

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

Direct Testimony of Aaron J. Rose

April 2024

1 **Q. Please state your name, business address, and present position with PacifiCorp**
2 **dba Rocky Mountain Power (“the Company”).**

3 A. My name is Aaron J. Rose, and my business address is 1407 W North Temple Street,
4 Suite 330, Salt Lake City, UT 84116. My present position is Assistant Revenue
5 Requirement Manager.

6 **Q. Please summarize your education and business experience.**

7 A. I earned a Bachelor of Science degree in Accounting from Westminster College, now
8 Westminster University, and a Master of Business Administration from the University
9 of Phoenix. In addition to my formal education, I have attended several accounting and
10 leadership seminars and courses. I have been employed by PacifiCorp since January
11 2018.

12 **Q. What are your current responsibilities as Assistant Revenue Requirement**
13 **Manager?**

14 A. My responsibilities include the calculation of the Company’s revenue requirement, the
15 preparation of business plan regulatory results and the preparation of the Company’s
16 Renewable Energy Credit (“REC”) filings in various states.

17 **Q. Have you submitted testimony in any previous regulatory proceedings?**

18 A. Yes, I have provided testimony before the Utah Public Service Commission.

19 **PURPOSE OF TESTIMONY**

20 **Q. Please describe the purpose of your testimony.**

21 A. My testimony supports the calculation of the Company’s REC and Sulfur Dioxide
22 (“SO₂”) Revenue Adjustment Mechanism (“RRA”) filing for Tariff Schedule 93
23 (“Schedule 93”). I illustrate how the forecast and deferral components produce an RRA

1 sur-credit of approximately \$2 million. In support of this request, my testimony
2 includes the following:

- 3 • Explanation of the process used to determine the Wyoming-allocated REC
4 and SO₂ revenues for the 12 months ending December 31, 2024 (the
5 “Forecast Period”), and the 12 months ended December 31, 2023 (the
6 “Comparison Period”);
- 7 • Discussion of the deferral balance calculation that represents the true-up of
8 calendar year 2023 actual REC and SO₂ revenues to the amount included in
9 rates; and
- 10 • Explanation of the REC revenues associated with the Leaning Juniper and
11 Pryor Mountain contracts included in this RRA filing.

12 **Q. Please describe Exhibits 4.1 through 4.3.**

13 A. Exhibits 4.1 through 4.3 support the calculation of the requested RRA sur-credit of \$2
14 million. They also illustrate how the Company determined the Wyoming-allocated
15 amount of REC and SO₂ revenues in the Forecast Period and the Comparison Period.

16 **Q. Please describe how Exhibits 4.1 through 4.3 are organized.**

17 A. Exhibits 4.1 through 4.3 are organized as follows:

- 18 • Exhibit 4.1 contains a summary of the RRA calculation highlighting how
19 the forecast and deferral components contribute to the Company’s sur-credit
20 calculation.
- 21 • Exhibit 4.2 provides the details of the REC and SO₂ forecast including the
22 calculation of the Wyoming-allocated amounts.

- 1 • Page 4.2.1 shows how the 2024 Wyoming forecast allocation of
2 REC sales was calculated reflecting the Company’s compliance with
3 California, Oregon, and Washington Renewable Portfolio Standards
4 (“RPS”).
- 5 • Page 4.2.2 shows the REC and SO₂ revenues that were included in
6 rates during calendar year 2023. These amounts are used in the
7 deferral component calculation in Exhibit 4.3, lines 3, 4, and 6.
- 8 • Exhibit 4.3 shows the calculation of the REC and SO₂ revenue deferred
9 balance.
 - 10 • Page 4.3.1 provides the Wyoming loads from Docket No. 20000-
11 617-EM-22 (“2022 RRA”) and Docket No. 20000-642-EM-23
12 (“2023 RRA”) that were in rates during the Comparison Period, as
13 well as actual calendar year 2023 loads.
 - 14 • Page 4.3.2 provides a summary by month of the actual REC and SO₂
15 revenue during the Comparison Period on a total-Company and
16 Wyoming-allocated basis.
 - 17 • Page 4.3.3 shows how the Wyoming-allocated amount of actual
18 2023 REC sales were determined by re-allocating the total-
19 Company amounts based on RPS eligibility.
 - 20 • Page 4.3.4 provides the calculation of the allocation factors for the
21 Comparison Period, which were used to allocate actual 2023 REC
22 and SO₂ revenues to Wyoming.

1

SUMMARY OF RRA FILING

2 **Q. Please summarize the various components of the Company's RRA filing that**
3 **comprise the Schedule 93 sur-credit of approximately \$2 million.**

4 A. The Company calculated the RRA filing based on the methodology described in
5 Company witness Andre T. Lipinski's direct testimony. The table below provides a
6 summary of how the Company arrived at the \$2 million requested sur-credit.

7

Table 1. Summary of REC and SO₂ Revenue Adjustment Mechanism

Description	Amount
Forecast REC and SO ₂ Revenue Projection	\$ 3,450,928
REC and SO ₂ Revenue Deferred Balance	(1,438,590)
Total RRA - Proposed	2,012,338
Total RRA Surcredit - Docket 20000-642-EM-23	4,119,605
Change in RRA Schedule 93	(2,107,267)

8 **Q. How does the Company propose to return this amount to customers?**

9 A. The Company is proposing to return this amount over a 12-month period from July 1,
10 2024, through June 30, 2025. The proposed rate change to implement the RRA is
11 provided in the direct testimony and supporting exhibits of Mr. Lipinski.

12

FORECAST PERIOD REC AND SO₂ REVENUE

13 **Q. What amount was included in the Forecast Period REC and SO₂ revenue**
14 **component of the Tariff Schedule 93?**

15 A. The Company's RRA calculation includes approximately \$3.5 million for the Forecast
16 Period REC revenue component of the tariff. As addressed in the testimony of
17 Company witness Marcelina R. Hundis, the Company is not projecting any sales of

1 SO₂ emissions allowances during calendar year 2024.

2 **Q. Please explain what the Forecast REC and SO₂ revenue represents and how it is**
3 **calculated.**

4 A. This amount is calculated using REC revenue projections during the Forecast Period.
5 Based on the current REC market described in the testimony of Ms. Hundis, the
6 Company expects it will realize approximately \$18.6 million total-Company, or
7 \$3.9 million Wyoming-allocated revenues from sale of RECs. To determine the
8 Forecast Period REC revenue component for the RRA, the Wyoming-allocated forecast
9 REC revenues of \$3.9 million were discounted for the time value of money using an
10 8.21 percent discount rate over 15 months, as described later in my testimony. This
11 results in Forecast Period REC revenues of approximately \$3.5 million for the
12 12 months ending December 31, 2024, as calculated in detail in Exhibit 4.2.

13 **Q. How did the Company determine the Wyoming-allocated REC revenues for the**
14 **Forecast Period in this filing?**

15 A. The Company used the allocation factors approved by the Wyoming Public Service
16 Commission (“Commission”) from its last general rate case (“GRC”), in Docket No.
17 20000-633-ER-23, to compute the Wyoming-allocated REC and SO₂ revenues during
18 the Forecast Period. The Company determines Wyoming’s allocated share of REC
19 revenue using the System Generation (“SG”) factor, including a reallocation of revenue
20 initially allocated system-wide to reflect compliance with state RPS. The Company
21 allocates REC revenues attributable to the Leaning Juniper and Pryor Mountain
22 contracts using the SG factor.

1 **Q. Please describe the time value of money adjustment.**

2 A. Schedule 93 details the calculation of the time value of money adjustment that was
3 approved by the Commission in Docket No. 20000-384-ER-10 (“2010 GRC”). The
4 Company discounted the Forecast Period RRA revenues by an 8.21 percent discount
5 rate over a 15-month period, as defined in the tariff, producing an adjustment of
6 approximately \$399 thousand. The tariff defines the calculation of the 8.21 percent as
7 the sum of the interest rate determined by the Commission pursuant to Commission
8 Rule, Chapter 3, Section 7, which is 6.71 percent for 2024, plus 1.5 percent.

9 **COMPARISON PERIOD REC AND SO₂ REVENUE DEFERRAL**

10 **Q. What is the Comparison Period REC and SO₂ revenue deferral component of**
11 **Schedule 93?**

12 A. The Company will collect from customers approximately \$1.4 million which comprises
13 the Comparison Period REC and SO₂ revenue deferral and is shown in Exhibit 4.3.

14 **Q. Please explain what this amount represents and how it is calculated.**

15 A. The deferral component for the Comparison Period represents a true-up of the
16 difference between actual REC and SO₂ revenues during the 12 months ended
17 December 31, 2023, and the amount of REC and SO₂ revenues in rates during the same
18 period, calculated in detail in Exhibit 4.3. The December 31, 2022 ending balance of
19 \$879 thousand from the Company’s 2023 RRA filing was rolled over to become the
20 January 1, 2023 beginning balance of the 2023 RRA Comparison Period. This amount
21 was adjusted by \$776 thousand to reflect a beginning balance for January 1, 2023 of
22 \$103 thousand. This adjustment will be discussed later in my testimony. The monthly
23 REC and SO₂ revenues in rates were compared to the actual monthly revenues realized

1 in 2023. The difference, adjusted for the time value of money and load variance, was
2 deferred each month, netted against the actual Schedule 93 surcharge, and accrued
3 carrying charges in accordance with the tariff. The \$1.4 million is collected from
4 customers in the current RRA.

5 **Q. How did the Company determine the Wyoming-allocated REC and SO₂ revenue**
6 **in rates during the Comparison Period as shown on lines 3 and 4 of Exhibit 4.3?**

7 A. The RRA revenues in rates during 2023 were determined using the REC and SO₂
8 revenues included in the 2022 RRA and the 2023 RRA. The REC and SO₂ revenues
9 shown for January 1, 2023 through June 30, 2023 reflect the amount set in rates in the
10 2022 RRA. The REC and SO₂ revenues shown for July 1, 2023 through December 31,
11 2023 reflect the amount approved in rates from the 2023 RRA. A summary of these
12 amounts is provided on page 4.2.2 of Exhibit 4.2.

13 **Q. Please describe the load adjustment.**

14 A. Schedule 93 specifies that the deferral balance is to be adjusted for the difference
15 between forecast billed units and actual billed units. The Company adjusted the
16 monthly revenues in rates for the corresponding difference between the actual 2023
17 load and the previous forecast load used to set rates. The monthly detail of load in rates
18 and actual load is provided on page 4.3.1 of Exhibit 4.3. The 2022 RRA loads were
19 used from January 1, 2023 through June 30, 2023, and the 2023 RRA loads were used
20 from July 1, 2023 through December 31, 2023.

1 **Q. How did the Company calculate the actual REC and SO₂ revenue during the**
2 **Comparison Period?**

3 A. Total-Company REC and SO₂ revenue is based on the revenues booked in the
4 accounting system by the Company during the Comparison Period. The Company used
5 actual 2023 jurisdictional allocation factors, as shown on page 4.3.4 of Exhibit 4.3, to
6 allocate the RRA revenues to Wyoming. This is consistent with the tariff and is the
7 same as the method used in the Energy Cost Adjustment Mechanism (“ECAM”). Page
8 4.3.3 of Exhibit 4.3 illustrates the reallocation of REC revenues to reflect the RPS
9 eligibility of the underlying resources that generated the RECs sold. Leaning Juniper
10 and Pryor Mountain contracts REC revenues were allocated using the 2023 SG factor,
11 and SO₂ revenue was allocated to Wyoming using the 2023 System Energy (“SE”)
12 allocation factor.

13 **Q. Do the Wyoming-allocated REC revenues for 2023 represent a final amount?**

14 A. Yes. As of the time of this RRA filing the resource assignments of 2023 REC sales
15 revenue is known and no further true-up adjustment will be needed.

16 **Q. Please describe the time value of money adjustment shown on lines 6 and 10 of**
17 **Exhibit 4.3.**

18 A. Schedule 93 provides for a time value of money adjustment to be applied to the REC
19 and SO₂ revenues. Exhibit 4.3 lines 6 and 10 illustrate how the Company applied the
20 time value of money adjustment by discounting both the in-rates RRA revenues and
21 the actual RRA revenues using the same methodology as the Forecast Period time value
22 of money adjustment. The discount rates for the Comparison Period were calculated as

1 the rate determined by the Commission pursuant to Commission Rule, Chapter 3,
2 Section 7 plus 1.5 percent per the tariff as shown in Exhibit 4.2 on Page 4.2.2.

3 **Q. Please explain how the January 1, 2023 beginning balance was determined.**

4 A. In Exhibit 4.3, line 13, the January 1, 2023 beginning balance is \$103 thousand. This
5 amount represents the December 31, 2022 ending balance from the 2023 RRA.¹ An
6 adjustment was identified in the Company's response to a data request from the
7 Wyoming Public Service Commission Consumer Advocate Staff 3.2 ("WPSC-CAS
8 3.2"). The original January 1, 2023 balance of \$879 thousand was adjusted by \$776
9 thousand to reflect a beginning balance of \$103 thousand.

10 **Q. Why was the January 1, 2023 beginning balance adjusted?**

11 A. When Exhibit 4.3 was originally prepared for Docket No. 20000-642-EM-23, a link
12 necessary to calculate the Schedule 93 Deferral Collection was not updated, resulting
13 in calendar year 2021 collections being used in the deferral calculation rather than 2022
14 collections. This affected only line 15 of the Schedule 93 Deferral Collection
15 calculation of Exhibit 4.3. After carrying charges, the total deferral impact was \$779
16 thousand.

17 **Q. Why does the \$779 thousand identified in WPSC-CAS 3.2 not match the \$775
18 thousand that was used to adjust the beginning balance for January 1, 2023?**

19 A. The \$779 thousand identified in WPSC-CAS 3.2 represents the full impact of making
20 the adjustment to Docket No. 20000-642-EM-23 and includes the forecasted period of
21 January 2023 through June of 2023. The \$776 thousand represents the impact of the

¹ As shown in Exhibit 4.3 on line 17 from Docket No. 20000-642-EM-23.

1 adjustment for January 2022 through December 2022, as an updated forecast period is
2 not needed for 2023 in the current docket.

3 **Q. What do the collection amounts on Exhibit 4.3, line 15 represent?**

4 A. The collection amounts on Exhibit 4.3, line 15 represent the actual billed Schedule 93
5 surcharges the Company collected from Wyoming customers related to the deferral
6 component established in the 2023 RRA. The January 1, 2023 through June 30, 2023
7 figures represent the amount set in the 2022 RRA. In the 2023 RRA, Exhibit 4.1, line
8 2 showed a REC and SO₂ revenue deferred balance of \$643 thousand. This amount was
9 included in the 2023 RRA, which became effective July 1, 2023. The amount of REC
10 and SO₂ revenues in rates exceeded the actual REC and SO₂ revenue received. As a
11 result, the Schedule 93 deferral collections resulted in an increase to the deferral
12 balance of approximately \$377 thousand.

13 **Q. Please describe what the estimated Schedule 93 surcharge from January 1, 2024**
14 **through June 30, 2024 represents.**

15 A. This surcharge represents an estimate that will be collected from customers during
16 January through June 2024 as a result of the 2024 RRA filing. With the exception of
17 January and February 2024, the monthly amounts shown on Exhibit 4.3, line 20 are
18 estimated as the actual amounts were not known at the time of filing. These numbers
19 will be updated using the actual collections in the next RRA filing.

1 **Q. If this filing is intended to true-up calendar year 2023 REC and SO₂ revenues, why**
2 **are the estimated Schedule 93 surcharges for the period of January through June**
3 **of 2024 included in your deferral calculation?**

4 A. The deferral balance established in the 2023 RRA was to be collected from customers
5 through June 30, 2024. Thus, it is necessary to deduct the 2024 surcharges to correctly
6 represent the June 30, 2024 ending balance.

7 **Q. Please explain how Schedule 93 addresses the calculation of carrying charges.**

8 A. Schedule 93 states that to the extent the deferred balance is positive, resulting in a
9 collection from customers, a carrying charge will be applied at the interest rate set by
10 the Commission. Thus, the Company's request includes applicable carrying charges
11 associated with the deferral balance.

12 **Q. Does the Company's request include carrying charges through the comparison**
13 **and collection period, January 1, 2023, through June 30, 2024?**

14 A. Yes. The Company has included \$43 thousand for carrying charges due to the overall
15 deferral balance calculation. According to the Schedule 93 tariff, the RRA deferred
16 balance will include a carrying charge only if the balance is positive.

17 **Q. Does this conclude your direct testimony?**

18 A. Yes.

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE)
APPLICATION OF ROCKY MOUNTAIN)
POWER TO RECOVER DEFERRED NET) DOCKET NO. 20000-__-EM-24
POWER COSTS PURSUANT TO TARIFF) (RECORD NO. ____)
SCHEDULE 95 ENERGY COST)
ADJUSTMENT MECHANISM AND)
PURSUANT TO TARIFF SCHEDULE 93,)
REC AND SO2 REVENUE ADJUSTMENT)
MECHANISM)

AFFIDAVIT, OATH AND VERIFICATION

Aaron J. Rose (Affiant) being of lawful age and being first duly sworn, hereby deposes and says that:

Affiant is the Assistant Revenue Requirement Manager for PacifiCorp, which is a party in this matter.

Affiant prepared and caused to be filed the testimony submitted on April 15, 2024. Affiant has, by all necessary action, been duly authorized to file the testimony and make this Oath and Verification.

Affiant hereby verifies that, based on Affiant's knowledge, all statements and information contained within the testimony and all of its associated attachments are true and complete and constitute the recommendations of the Affiant in their official capacity as Assistant Revenue Requirement Manager.

Further Affiant Sayeth Not.

Dated this 4 day of April, 2024

[Handwritten signature of Aaron J. Rose]

Aaron J. Rose
Assistant Revenue Requirement Manager
1407 W North Temple Street, Suite 330
Salt Lake City, UT 84116

STATE OF Utah)
) SS:
COUNTY OF Salt Lake)

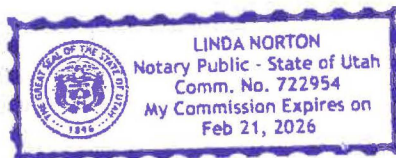
The foregoing was acknowledged before me by Aaron J. Rose on this 4th day of April, 2024. Witness my hand and official seal.

[Handwritten signature of Notary Public]

Notary Public

My Commission Expires:

2/21/2026



Rocky Mountain Power
Exhibit 4.1
Docket No. 20000-__-EM-24
Witness: Aaron J. Rose

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Aaron J. Rose
Summary of RRA Calculation

April 2024

Rocky Mountain Power
Wyoming REC and SO2 Revenue Adjustment Mechanism
 April 15, 2024

Summary of Wyoming REC and SO2 Revenue Adjustment Mechanism (Schedule 93)

Line			
No.	Description	Amount	Reference
1	Forecast REC and SO2 Revenue Projection	\$ 3,450,928	4.2
2	REC and SO2 Revenue Deferred Balance	(1,438,590)	4.3
3	Total RRA - Proposed	2,012,338	Line 1 + Line 2
4	Present RRA Surcredit ¹	\$ 4,119,605	Exhibit 5.1
5	Change in RRA Schedule 93	(2,107,267)	Line 3 - Line 4

Footnotes:

1) Product of Exhibit 5.1 pricing and forecast billing units for the twelve months ending June 2025.

Rocky Mountain Power
Exhibit 4.2
Docket No. 20000-__-EM-24
Witness: Aaron J. Rose

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Aaron J. Rose
REC and SO2 Forecast

April 2024

Rocky Mountain Power
Wyoming REC and SO2 Revenue Adjustment Mechanism
 April 15, 2024

Calculation of Forecast REC and SO2 Revenue

Line No.	Forecast Period	Current RRA Filing	Reference
		CY 2024	
		<i>July 1, 2023 -</i>	
	<i>Rate Effective Period</i>	<i>June 30, 2024</i>	
REC Revenue			
1	Total Company	18,624,650	4.2.1
2	Wyoming Allocated	3,850,010	4.2.1
SO2 Revenue			
3	Total Company	-	4.2.1
4	Wyoming Allocated	-	4.2.1
5	Discount for Time Value of Money	(399,082)	Schedule 93, page 2
6	Rate	8.21%	Customer Deposit Interest Rate + 1.5%
7	Months	15	Schedule 93, page 2
8	RRA Surcredit	3,450,928	Line 2 + Line 4 + Line 5

Rocky Mountain Power
 Wyoming REC and SO2 Revenue Adjustment Mechanism
 April 15, 2024

Calculation of Wyoming Allocated Forecast REC and SO2 Revenue for CY 2024

December 2024 - REC Revenues - CA/OR/WA Eligible Resources(1)	\$ 8,040,989
December 2024 - REC Revenues - CA/OR Eligible Resources(1)	\$ 1,076,913
December 2024 - REC Revenues - CA/WA Eligible Resources(1)	\$ 763,111
December 2024 - REC Revenues - OR/WA Eligible Resources(1)	\$ 46,000
December 2024 - REC Revenues - OR Eligible Resources(1)	\$ 18,400
December 2024 - REC Revenues - CA Eligible Resources(1)	\$ 12,650
December 2024 - REC Revenues - Not Eligible Resources(1)	\$ 34,500
December 2024 REC Revenues - Known Sales	\$ 9,992,563

Reallocate December 2024 for Renewable Portfolio Standards

	Factor	Total	California	Oregon	Washington	Wyoming	Utah	Idaho	FERC
SG Factor Amounts - Docket No. 20000-633-ER-23	SG	100.000%	1.370%	28.684%	7.496%	13.623%	43.086%	5.711%	0.029%
Estimated December 2024 REC Rev - Eligible for CA/OR/WA RPS	SG	8,040,989	110,199	2,306,512	602,739	1,095,412	3,464,556	459,207	2,363
Adjustment for RPS/Commission Order	SG	4,835,046	66,263	1,386,906	362,427	658,671	2,083,238	276,121	1,421
Adjustment for RPS/Commission Order	Situs	(4,835,046)	(176,462)	(3,693,418)	(965,167)				
Estimated December 2024 REC Revenues - Reallocated Totals		8,040,989	-	-	-	1,754,083	5,547,794	735,327	3,784
Estimated December 2024 REC Rev - Eligible for CA/OR RPS	SG	1,076,913	14,759	308,906	80,724	146,706	464,001	61,501	316
Adjustment for RPS/Commission Order	SG	462,742	6,342	132,735	34,686	63,039	199,378	26,426	136
Adjustment for RPS/Commission Order	Situs	(462,742)	(21,100)	(441,641)					
Estimated December 2024 REC Revenues - Reallocated totals		1,076,913	-	-	115,410	209,745	663,379	87,927	452
Estimated December 2024 REC Rev - Eligible for CA/WA RPS Only	SG	763,111	10,458	218,894	57,202	103,957	328,795	43,580	224
Adjustment for RPS/Commission Order	SG	74,242	1,017	21,296	5,565	10,114	31,988	4,240	22
Adjustment for RPS/Commission Order	Situs	(74,242)	(11,476)		(62,767)				
Estimated December 2024 REC Revenues - Reallocated totals		763,111	-	240,190	-	114,071	360,784	47,820	246
Estimated December 2024 REC Rev - Eligible for OR/WA RPS Only	SG	46,000	630	13,195	3,448	6,267	19,820	2,627	14
Adjustment for RPS/Commission Order	SG	26,078	357	7,480	1,955	3,553	11,236	1,489	8
Adjustment for RPS/Commission Order	Situs	(26,078)		(20,675)	(5,403)				
Estimated December 2024 REC Revenues - Reallocated totals		46,000	988	-	-	9,819	31,056	4,116	21
Estimated December 2024 REC Rev - Eligible for OR RPS Only	SG	18,400	252	5,278	1,379	2,507	7,928	1,051	5
Adjustment for RPS/Commission Order	SG	7,401	101	2,123	555	1,008	3,189	423	2
Adjustment for RPS/Commission Order	Situs	(7,401)		(7,401)					
Estimated December 2024 REC Revenues - Reallocated totals		18,400	354	-	1,934	3,515	11,117	1,473	8
Estimated December 2024 REC Rev - Eligible for CA RPS Only	SG	12,650	173	3,629	948	1,723	5,450	722	4
Adjustment for RPS/Commission Order	SG	176	2	50	13	24	76	10	0
Adjustment for RPS/Commission Order	Situs	(176)	(176)						
Estimated December 2024 REC Revenues - Reallocated totals		12,650	-	3,679	961	1,747	5,526	732	4
Reallocated Revenues for 12 ME December 2024	SG	5,372,030	73,622	1,540,937	402,679	731,824	2,314,604	306,787	1,579
	Situs	(5,372,030)	(209,038)	(4,135,059)	(1,027,833)	-	-	-	-
Actual Jan - Dec 2024 REC Revenues Not Compliance	SG	34,500	473	9,896	2,586	4,700	14,865	1,970	10
Estimated December 2024 REC Revenues - Total Reallocated Known Sales		9,992,563	1,814	253,765	120,891	2,097,681	6,634,519	879,367	4,525
		(A)				(B)			

	Total Company	Percentage %	Wyoming Alloc	Reference
Known REC contract sales	9,992,563	20.99%	2,097,681	(B) / (A)
Additional estimated REC revenue sales - Structured	4,628,358	20.99%	971,604	(B) / (A)
Additional estimated REC revenue sales - Unstructured	3,192,894	20.99%	670,266	(B) / (A)
Estimated Leaning Juniper & Pryor Mountain revenue	810,836	13.62%	110,459	Wyoming SG Factor - Docket No. 20000-633-ER-23
Total CY 2024 REC revenue forecast	18,624,650		3,850,010	

	Total Company	Percentage %	Wyoming Alloc	Reference
Forecast SO2 sales	-	14.55%	-	Wyoming SE Factor - Docket No. 20000-633-ER-23

1) Please see 3.3 for the 2024 REC revenue forecast sales by resource

Rocky Mountain Power
Wyoming REC and SO2 Revenue Adjustment Mechanism
 April 15, 2024

Prior RRA Forecast REC and SO2 Revenue
(Used to calculate the amount of REC and SO2 in rates in 4.3, Lines 3, 4, and 6)

Line No.		Docket No. 20000-617-EM-22, Exhibit RMP__(NLH-2)	Docket No. 20000-664-EM-2, Exhibit 4.2
	Forecast Period	CY 2022	CY 2023
		<i>July 1, 2022 -</i>	<i>July 1, 2023 -</i>
	<i>Rate Effective Period</i>	<i>June 30, 2023</i>	<i>June 30, 2024</i>
	REC Revenue		
1	Total Company	10,782,401	17,939,888
2	Wyoming Allocated	2,373,503	3,903,966
	SO2 Revenue		
3	Total Company	-	-
4	Wyoming Allocated	-	-
5	Discount for Time Value of Money	(94,420)	(268,734)
6	Rate	3.17%	5.47%
7	Months	15	15
8	RRA Surcredit	2,279,084	3,635,231
	Monthly Amount		
9	Wyoming Allocated REC Revenue (Line 2 / 12)	197,792	325,330

Rocky Mountain Power
Exhibit 4.3
Docket No. 20000-__-EM-24
Witness: Aaron J. Rose

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

Exhibit Accompanying Direct Testimony of Aaron J. Rose
REC and SO2 Revenue Deferred Balance

April 2024

Rocky Mountain Power
Wyoming REC and SO2 Revenue Adjustment Mechanism
April 15, 2024

Calculation of REC and SO2 Revenue Deferred Balance

Comparison Period 2023

Line No.	Reference	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total CY 2023	
1	WY Load in Rates (@ sales)	4.3.1	767,696	694,876	757,629	719,795	722,264	738,834	748,607	773,470	718,264	743,771	739,266	787,378	8,911,851
2	WY Actual Load (@ sales)	4.3.1	767,720	703,596	733,307	686,286	702,348	641,131	701,070	713,346	670,004	719,248	737,721	802,943	8,578,719
3	WY REC in Rates	Footnote 1	197,792	197,792	197,792	197,792	197,792	197,792	325,330	325,330	325,330	325,330	325,330	325,330	3,138,734
4	WY SO2 in Rates	Footnote 1	-	-	-	-	-	-	-	-	-	-	-	-	
5	Load Adjustment	Footnote 2	6	2,482	(6,350)	(9,208)	(5,454)	(26,156)	(20,659)	(25,289)	(21,859)	(10,727)	(680)	6,431	(117,462)
6	Time Value of Money Adjustment	Footnote 3	(7,869)	(7,967)	(7,616)	(7,502)	(7,651)	(6,828)	(20,972)	(20,654)	(20,890)	(21,656)	(22,348)	(22,837)	(174,790)
7	Total WY REC and SO2 in Rates	Sum Lines 3 - 6	189,930	192,307	183,826	181,082	184,687	164,808	283,699	279,388	282,582	292,948	302,303	308,924	2,846,483
8	WY Actual REC Revenue	4.3.2	13,091	431,375	837,803	351,930	140,383	9,169	109,482	(97,971)	6,084	6,407	74,466	268,391	2,150,609
9	WY Actual SO2 Revenue	4.3.2	-	-	-	14	-	-	-	-	-	-	-	14	
10	Time Value of Money Adjustment	Footnote 3	(1,357)	(44,715)	(86,844)	(36,482)	(14,552)	(950)	(11,349)	10,155	(631)	(664)	(7,719)	(27,821)	(222,928)
11	REC and SO2 Revenue Subject to Deferral	Sum Lines 8 - 10	11,734	386,660	750,959	315,463	125,831	8,219	98,133	(87,816)	5,454	5,743	66,747	240,570	1,927,695
12	Monthly Deferral for Collection/(Refund)	Line 7 - Line 11	178,195	(194,353)	(567,133)	(134,381)	58,856	156,589	185,566	367,203	277,128	287,205	235,556	68,354	918,788
13	Beginning Balance	Footnote 4	(103,015)	113,214	(40,374)	(583,640)	(684,945)	(609,356)	(429,917)	(253,473)	166,017	497,426	815,171	1,082,857	
14	Monthly Deferral	Line 12	178,195	(194,353)	(567,133)	(134,381)	58,856	156,589	185,566	367,203	277,128	287,205	235,556	68,354	918,788
15	Schedule 93 Deferral Collection		38,017	40,644	23,867	33,076	16,733	22,849	(9,122)	52,287	53,185	28,372	28,995	48,379	377,283
16	Carrying Charge	Footnote 5	17	120	-	-	-	-	-	1,096	-	2,168	3,134	3,776	10,310
17	Ending Balance	Sum Lines 13 - 16	113,214	(40,374)	(583,640)	(684,945)	(609,356)	(429,917)	(253,473)	166,017	497,426	815,171	1,082,857	1,203,366	

Interim Period - Jan - June 30, 2024 (Footnote 6)

Line No.	Reference	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Total	
18	Beginning Balance	Line 17, Footnote 6	1,203,366	1,225,333	1,265,475	1,296,815	1,328,331	1,360,023	7,679,343
19	Monthly Deferral								
20	Schedule 93 Deferral Collection	Footnote 7	15,195	33,198	24,197	24,197	24,197	145,180	
21	Carrying Charge	Footnote 8	6,771	6,944	7,144	7,319	7,495	7,672	43,346
22	Ending Balance	Sum Lines 18 - 21	1,225,333	1,265,475	1,296,815	1,328,331	1,360,023	1,391,892	
23	Accrued Interest during Rate Effective Period	Footnote 9						46,698	
24	REC and SO2 Revenue Deferred Balance	Line 22 + Line 23						1,438,590	
25	Deferred Balance Carrying Charge - 2023	Commission Rule Chpt. 3, Sect. 7	3.97%						
26	Deferred Balance Carrying Charge - 2024	Commission Rule Chpt. 3, Sect. 7	6.71%						

1) Please see Page 2.2. The January 2023 through June 30, 2023 REC and SO2 amounts in rates come from Docket No. 20000-617-EM-22. The July 1, 2023 through December 2023 REC and SO2 amounts in rates come from Docket No. 20000-642-EM-23.
2) In compliance with the Schedule 93 tariff, Line 5 adjusts the deferral calculation for the difference between the forecasted billed units, shown on Line 1 and actual billed units, shown on Line 2.
3) Lines 6 and 10 represents the time value of money adjustment. This is included to comply with the Schedule 93 tariff.
4) The beginning balance shown for January represents the (\$99) thousand ending December 31, 2022 balance from Docket No. 20000-642-EM-23. No additional true-up was required since REC Resource assignments for 2023 remain unchanged from those included in the 2023 RRA filing, the beginning balance on row 13 for January 2023 incorporates a \$775,657 adjustment from Data response WPSC CAS 3.2.
5) Carrying charges were applied to the monthly deferral according to the Schedule 93 tariff, which specifies that when the RRA deferred balance is positive, a carrying charge will be applied at the interest rate pursuant to Commission Rule Chapter 3, Section 7.
6) These 2024 amounts are shown to calculate the balance as of June 30, 2024 including applicable carrying charges and Schedule 93 surcredits that will continue through June 2023. The surcredits and carrying charges shown in 2023 relate to the CY 2022 deferral. Differences between the 2024 amount in base rates and actual sales will be deferred and presented in the Company's RRA filing on April 15, 2025.
7) The surcredit shown for January and February 2024 represents the actual surcharge billed. The March through June 30, 2024 amounts were not available at the time of filing and represent estimates. The June 30, 2024 amount represents the surcharge that is related to 2024 usage, but are not billed until later in July 2024 due to lag in the Company's billing cycles.
8) This represents the interest accrued on the December 31, 2023 deferral balance for the period of January 1, 2024 through June 30, 2024.
9) If the deferred balance is positive, this represents the interest that will accrue during the rate effective period, July 1, 2024 through June 30, 2025.

Rocky Mountain Power
Wyoming REC and SO2 Revenue Adjustment Mechanism
 April 15, 2024

Summary of Wyoming Load (MWh) @ Sales

	<u>Calendar Year</u>	<u>January</u>	<u>February</u>	<u>March</u>	<u>April</u>	<u>May</u>	<u>June</u>	<u>July</u>	<u>August</u>	<u>September</u>	<u>October</u>	<u>November</u>	<u>December</u>	<u>Total</u>
Docket No. 20000-617-EM-22	2022							766,973	734,020	694,551	719,764	715,603	773,081	
Docket No. 20000-617-EM-22	2023	767,696	694,876	757,629	719,795	722,264	738,834							8,805,087
Docket No. 20000-642-EM-23	2023							748,607	773,470	718,264	743,771	739,266	787,378	
Docket No. 20000-642-EM-23	2024	800,115	750,838	771,674	725,976	726,339	719,088							9,004,786
Actual Load CY 2023		767,720	703,596	733,307	686,286	702,348	641,131	701,070	713,346	670,004	719,248	737,721	802,943	8,578,719

Rocky Mountain Power
Wyoming REC and SO2 Revenue Adjustment Mechanism
April 15, 2024

Summary of Wyoming Allocated Actual REC and SO2 Revenue for CY 2023

Line No.	Reference	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Total	
1	Total Company 2023 REC Revenue	Footnote 1	587	1,966,410	3,887,569	1,593,288	611,707	(5,932)	489,092	(488,237)	(347)	167	324,155	1,227,133	9,605,592
2	WY Allocation Factor	4.3.3	21.25%	21.25%	21.25%	21.25%	21.25%	21.25%	21.25%	21.25%	21.25%	21.25%	21.25%	21.25%	
3	WY Allocated	Line 1 * Line 3	125	417,941	826,264	338,637	130,012	(1,261)	103,952	(103,770)	(74)	36	68,896	260,815	2,041,572
4	Total Company 2023 LJ & Pryor Mountain Revenue	SAP Actuals	92,924	96,275	82,699	95,261	74,319	74,747	39,630	41,557	44,131	45,658	39,915	54,292	781,408
5	WY Allocation Factor - SG	4.3.4	13.95%	13.95%	13.95%	13.95%	13.95%	13.95%	13.95%	13.95%	13.95%	13.95%	13.95%	13.95%	
6	WY Allocated	Line 6 * Line 7	12,966	13,434	11,540	13,293	10,370	10,430	5,530	5,799	6,158	6,371	5,570	7,576	109,037
7	Total 2023 REC Revenue	Line 3 + Line 6	13,091	431,375	837,803	351,930	140,383	9,169	109,482	(97,971)	6,084	6,407	74,466	268,391	2,150,609
8	Total Company 2023 SO2 Revenue	SAP Actuals	-	-	-	91	-	-	-	-	-	-	-	-	91
9	WY Allocation Factor - SE	4.3.4	15.72%	15.72%	15.72%	15.72%	15.72%	15.72%	15.72%	15.72%	15.72%	15.72%	15.72%	15.72%	
10	WY Allocated	Line 8 * Line 9	-	-	-	14	-	-	-	-	-	-	-	-	14

1) Total Company 2023 REC Revenue from SAP actuals, excluding Utah situs assigned Kennecott REC sale

Rocky Mountain Power
 Wyoming REC and SO2 Revenue Adjustment Mechanism
 April 15, 2024

Calculation of Wyoming Allocated REC Actuals for CY 2023

Jan - Dec 2023 - Actual REC Revenues - CA/OR/WA Eligible Resources(1)	\$ 8,098,005
Jan - Dec 2023 - Actual REC Revenues - CA/OR Eligible Resources(1)	\$ 431,312
Jan - Dec 2023 - Actual REC Revenues - CA/WA Eligible Resources(1)	\$ 541,540
Jan - Dec 2023 - Actual REC Revenues - CA Eligible Resources(1)	\$ 45,503
Jan - Dec 2023 - Actual REC Revenues - OR Eligible Resources(1)	\$ 51,254
Jan - Dec 2023 - Actual REC Revenues - OR/WA Eligible Resources(1)	\$ 227,217
Jan - Dec 2023 - Actual REC Revenues - Not Eligible For RPS Compliance	\$ 210,762
Total Jan - Dec 2023 REC Revenues	\$ 9,605,593

Reallocate Jan - Dec 2023 REC Revenues for Renewable Portfolio Standards

	Type	Factor	Total	California	Oregon	Washington	Wyoming	Utah	Idaho	FERC
SG Factor Amounts - Actual 2023		SG	100.000%	1.474%	27.283%	7.739%	13.954%	43.948%	5.579%	0.024%
Actual Jan - Dec 2023 REC Rev - Eligible for CA/OR/WA RPS	1	SG	8,098,005	119,363	2,209,373	626,675	1,129,984	3,558,882	451,802	1,926
Adjustment for RPS/Commission Order	1	SG	4,653,862	68,597	1,269,710	360,145	649,393	2,045,263	259,647	1,107
Adjustment for RPS/Commission Order	1	Situs	(4,653,862)	(187,960)	(3,479,082)	(986,820)				
Actual Jan - Dec 2023 REC Revenues - Reallocated Totals			8,098,005	-	-	-	1,779,378	5,604,145	711,450	3,033
Actual Jan - Dec 2023 REC Rev - Eligible for CA/OR RPS	1	SG	431,312	6,357	117,674	33,378	60,185	189,551	24,064	103
Adjustment for RPS/Commission Order	1	SG	174,097	2,566	47,499	13,473	24,293	76,511	9,713	41
Adjustment for RPS/Commission Order	1	Situs	(174,097)	(8,924)	(165,173)					
Actual Jan - Dec 2023 REC Revenues - Reallocated Totals			431,312	-	-	46,850	84,478	266,063	33,777	144
Actual Jan - Dec 2023 REC Rev - Eligible for CA/WA RPS	1	SG	541,540	7,982	147,748	41,908	75,566	237,994	30,214	129
Adjustment for RPS/Commission Order	1	SG	54,953	810	14,993	4,253	7,668	24,150	3,066	13
Adjustment for RPS/Commission Order	1	Situs	(54,953)	(8,792)		(46,160)				
Actual Jan - Dec 2023 REC Revenues - Reallocated Totals			541,540	-	162,741	-	83,234	262,144	33,279	142
Actual Jan - Dec 2023 REC Rev - Eligible for CA RPS Only	1	SG	45,503	671	12,415	3,521	6,349	19,998	2,539	11
Adjustment for RPS/Commission Order	1	SG	681	10	186	53	95	299	38	0
Adjustment for RPS/Commission Order	1	Situs	(681)	(681)						
Actual Jan - Dec 2023 REC Revenues - Reallocated Totals			45,503	-	12,600	3,574	6,444	20,297	2,577	11
Actual Jan - Dec 2023 REC Rev - Eligible for OR RPS Only	1	SG	51,254	755	13,984	3,966	7,152	22,525	2,860	12
Adjustment for RPS/Commission Order	1	SG	19,230	283	5,247	1,488	2,683	8,451	1,073	5
Adjustment for RPS/Commission Order	1	Situs	(19,230)		(19,230)					
Actual Jan - Dec 2023 REC Revenues - Reallocated Totals			51,254	1,039	-	5,454	9,835	30,976	3,932	17
Actual Jan - Dec 2023 REC Rev - Eligible for OR/WA RPS Only	1	SG	227,217	3,349	61,991	17,583	31,706	99,856	12,677	54
Adjustment for RPS/Commission Order	1	SG	122,463	1,805	33,412	9,477	17,088	53,820	6,832	29
Adjustment for RPS/Commission Order	1	Situs	(122,463)		(95,403)	(27,060)				
Actual Jan - Dec 2023 REC Revenues - Reallocated Totals			227,217	5,154	-	-	48,794	153,676	19,509	83
Reallocated REC Revenues for Jan - Dec 2023		SG	5,025,286	74,072	1,371,045	388,888	701,221	2,208,494	280,370	1,195
		Situs	(5,025,286)	(206,356)	(3,758,889)	(1,060,041)	-	-	-	-
Actual Jan - Dec 2023 REC Revenues Not Compliance		SG	210,762	3,107	57,502	16,310	29,409	92,625	11,759	50
Actual Jan - Dec 2023 REC Revenues - Total Reallocated			9,605,593	9,300	232,843	72,189	2,041,572	6,429,926	816,283	3,480
			(A)				(B)			

	Reference
Wyoming % of Actual CY 2023 REC sales(2)	21.25% C = B / A
Wyoming allocated CY 2023 REC revenue(2)	2,041,572 D = C * A
Total Company Actual CY 2023 Leaning Juniper Revenue & Pryor Mountain Revenue	781,408 E = SAP Actuals
Wyoming % of Actual Leaning Juniper & Pryor Mountain Revenue (SG Factor)	13.95% F = See 4.3.4
Wyoming allocated CY 2023 Leaning Juniper & Pryor Mountain Revenue	109,037 G = E * F
Total Wyoming allocated CY 2023 REC revenue	2,150,609 H = D + G

1) Confidential Exhibit 3.5 provides the actual 2023 REC revenue by resource. SAP Variance is spread as a weighted amount based on REC eligibility.

Rocky Mountain Power
Wyoming REC and SO2 Revenue Adjustment Mechanism
April 15, 2024

Calculation of Wyoming CY 2023 Actual Allocation Factors

Coincident Peaks:

Year	Month	Day	hour	CA	OR	WA	UT	ID	WY	FERC	Total
2023	1	30	9	148	2,746	807	3,478	482	1,255	3	8,920
2023	2	2	8	143	2,606	779	3,452	436	1,197	3	8,616
2023	3	6	8	146	2,449	622	3,285	426	1,131	2	8,061
2023	4	3	9	140	2,305	577	3,230	352	1,167	1	7,773
2023	5	19	17	118	2,058	630	3,520	465	1,056	1	7,850
2023	6	30	18	135	2,424	707	4,106	683	1,080	2	9,136
2023	7	21	18	135	2,500	737	5,173	759	1,156	3	10,463
2023	8	15	17	140	2,890	807	5,213	509	1,223	3	10,785
2023	9	8	17	72	1,959	576	4,330	458	1,116	2	8,513
2023	10	30	8	122	2,308	666	3,152	414	1,182	2	7,845
2023	11	28	8	149	2,638	711	3,242	363	1,184	2	8,287
2023	12	18	18	119	2,233	658	3,629	357	1,212	2	8,209
Total 12 CP				1,567	29,117	8,277	45,811	5,703	13,959	25	104,458

System Capacity Factor	1.5001%	27.8741%	7.9234%	43.8556%	5.4593%	13.3635%	0.0240%	100.0000%
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Energy:

Year	Month	CA	OR	WA	UT	ID	WY	FERC	Total
2023	1	81,541	1,456,876	447,899	2,312,609	303,538	866,266	2,196	5,470,924
2023	2	72,614	1,318,550	381,275	2,089,476	284,568	772,483	1,364	4,920,330
2023	3	80,624	1,398,955	375,198	2,163,668	294,802	820,856	1,142	5,135,244
2023	4	68,358	1,192,241	309,260	1,961,099	252,861	769,276	1,372	4,554,467
2023	5	69,109	1,138,548	301,254	2,057,308	273,264	756,166	793	4,596,442
2023	6	64,614	1,164,605	322,593	2,071,698	368,186	734,557	804	4,727,056
2023	7	81,919	1,363,081	381,876	2,868,671	481,082	793,229	1,332	5,971,190
2023	8	69,068	1,376,060	368,154	2,673,228	318,523	792,676	1,156	5,598,864
2023	9	53,028	1,117,275	313,611	2,153,965	285,199	745,143	839	4,669,059
2023	10	59,888	1,192,046	324,091	2,030,357	258,137	793,706	853	4,659,078
2023	11	67,419	1,302,262	392,825	2,067,432	221,546	801,593	971	4,854,047
2023	12	74,920	1,388,845	421,680	2,264,475	245,710	852,880	1,127	5,249,636
Total Energy		843,103	15,409,341	4,339,714	26,713,985	3,587,417	9,498,831	13,947	60,406,339

System Energy Factor	1.3957%	25.5095%	7.1842%	44.2238%	5.9388%	15.7249%	0.0231%	100.0000%
System Generation Factor	1.4740%	27.2829%	7.7386%	43.9476%	5.5792%	13.9539%	0.0238%	100.0000%