

October 1, 2026

VIA ELECTRONIC FILING

Wyoming Public Service Commission
2515 Warren Avenue, Suite 300
Cheyenne, Wyoming 82002

Attn: John Burbridge, Chief Counsel

Docket No. 20000-____-EA-26
Record No. _____

**RE: IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
FOR AUTHORITY TO AMEND THE FINAL PLAN TO ESTABLISH LOW-CARBON
ENERGY PORTFOLIO STANDARDS – Application**

Dear Mr. Burbridge:

Please find enclosed for filing Rocky Mountain Power's (the "Company") first amendment to the Final Plan to develop and establish low-carbon energy portfolio standards as required by the Wyoming Public Service Commission's administrative rules. Supporting exhibits and workpapers along with a petition for confidential treatment were included with the application.

It is respectfully requested that all formal correspondence and staff requests regarding this matter be addressed to:

By email (preferred): datarequest@pacificorp.com
stacy.splittstoesser@pacificorp.com
zachary.rogala@pacificorp.com

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

With copies to: Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 West 27th Street
Cheyenne, Wyoming 82001
Email: stacy.splittstoesser@pacificorp.com

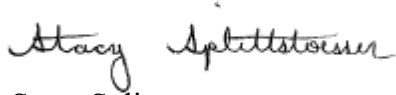
Wyoming Public Service Commission

October 1, 2026

Page 2

If there are any informal questions related to this filing, please feel free to contact me at (801) 534-5018.

Sincerely,

A handwritten signature in dark ink, reading "Stacy Splittstoesser". The signature is written in a cursive, flowing style.

Stacy Splittstoesser

Wyoming Regulatory Affairs Manager

Enclosures

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 Rocky Mountain Power
 1407 W. North Temple
 Salt Lake City, Utah 84116
 (801) 220-4445
 zachary.rogala@pacificorp.com

Attorney for Rocky Mountain Power

BEFORE THE WYOMING PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER FOR AUTHORITY TO AMEND THE FINAL PLAN TO ESTABLISH LOW-CARBON ENERGY PORTFOLIO STANDARDS	Docket No. 20000-____-EA-26 Record No. _____
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FIRST AMENDMENT TO THE FINAL PLAN

PacifiCorp d/b/a Rocky Mountain Power (the “Company”) respectfully submits this first amendment to the Company’s final plan (“Amended Final Plan”), to comply with Wyoming’s Low-Carbon Energy Portfolio Standards (“Portfolio Standards”) for Wyoming Public Service Commission (“Commission”) review.

In the Company’s 2026 annual update filing (“2026 Update”),¹ the Company committed to submitting an additional filing outlining the Company’s determination on the prudent path forward to implement Wyoming’s Portfolio Standards, after evaluation of Phase 2 of the front-end engineering and design study (“FEED”) for Jim Bridger Units 3 and 4, and the pre-FEED study for the Allam-Fetvedt Cycle (“AFC”) project for Dave Johnston were complete.

As detailed below, the Company has completed its evaluation of Phase 2 of the Jim Bridger FEED study, and the Company’s project partner has completed their evaluation of the AFC

¹ *In re Rocky Mountain Power Application for the Annual Update to the Final Plan to Establish Low-Carbon Energy Portfolio Standards*, Docket No. 20000-704-EA-26 (Record No. 18092).

pre-FEED study. Based on these analyses, the Company has concluded there is a reasonable likelihood that the carbon capture and storage (“CCS”) projects evaluated in the Jim Bridger FEED study and AFC pre-FEED study are not economically feasible at this time. Further, after analyzing the cost estimates developed from Phase 2, the Company believes that the Jim Bridger CCS project would no longer be included as a least-cost, least-risk resource under a Company-owned and operated environment. As a result, the Company proposes to: (1) discontinue Company-led development of CCS resources at Jim Bridger; and explore the possibility of conducting a request for proposal (“RFP”) process for third-party-developed CCS solutions; (2) discontinue the AFC project as the Company’s project partner has indicated they do not plan to move forward with further development at this time; and (3) maintain the intermediate low-carbon energy portfolio standard at zero.

1. Rocky Mountain Power is a public utility subject to the Commission’s jurisdiction regarding the Company’s public utility operations, retail rates, services, and accounting practices. PacifiCorp provides retail electricity service as Rocky Mountain Power in Wyoming, Utah, and Idaho, and as Pacific Power in Oregon, Washington, and California.

2. Rocky Mountain Power’s principal place of business in Wyoming is 2840 East Yellowstone Highway, Casper, Wyoming 82609.

3. Formal correspondence and requests for additional information regarding this matter should be addressed to:

By email (preferred): datarequest@pacificorp.com
stacy.splittstoesser@pacificorp.com
zachary.rogala@pacificorp.com

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

With copies to: Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 West 27th Street
Cheyenne, Wyoming 82001

4. Informal inquiries regarding this filing may be directed to Stacy Splittstoesser, Wyoming Regulatory Affairs Manager, at (801) 534-5018.

I. JIM BRIDGER FEED STUDY

5. The Company's 2024 Final Plan outlined Rocky Mountain Power's plan to conduct a multi-phased, amine-based carbon capture retrofit FEED study at Jim Bridger Units 3 and 4, that was designed to preserve decision-making at key milestones as the study progresses. Phase 1 consisted of a generic pre-FEED study, Phase 2 consisted of three technology vendor-specific pre-FEED studies, and Phase 3 consists of a single vendor detailed FEED study.

A. Phase 1 Overview

6. The Company completed Phase 1 in October 2025. Phase 1 established an initial design basis for the carbon capture facility, including operating profiles, utility sourcing studies, conceptual site layouts, and developed site-specific technical and economic characteristics for an amine-based carbon capture retrofit at Jim Bridger Units 3 and 4. Capital cost estimates developed from Phase 1 were representative of an Association for the Advancement of Cost Engineering ("AACE") Class 4 cost accuracy range (-20% / +35%) for the capture facility and an AACE Class 5 cost accuracy range (-50% / +50%) for the transport and storage ("T&S") facilities. The carbon capture facility performance and cost data developed from Phase 1 were not based on any one

specific carbon capture vendor's technology but rather based on the Company's owner's engineer's history and experience with several amine-based carbon capture studies and projects.²

7. To complement the carbon capture facility design and engineering, a T&S conceptual study was conducted to identify preliminary on-site T&S solutions. While the estimated carbon capture facility operating costs and T&S costs were generally consistent with the Company's assumptions prior to initiating the FEED study, Phase 1 results indicated that the carbon capture capital costs and auxiliary loads associated with a carbon capture facility are significantly higher than the proxy costs developed from the Department of Energy ("DOE") published studies, demonstrating the value of Phase 1 and validating the need for developing site-specific data. Proxy inputs were used in the Company's 2025 Integrated Resource Plan ("IRP"), and site-specific CCS performance and cost assumptions from Phase 1 were used in the Company's 2025 IRP Update. Key inputs are summarized in Table 1 below, reflective of PacifiCorp share.

Table 1. CCS Performance and Cost Data (2025 dollars)

Description	Proxy DOE Data	FEED Study Phase 1	% Change
IRP Evaluation	2025 IRP	2025 IRP Update	
Capture Facility Capital	\$2,664/kW	\$5,255/kW	+97%
Capture Facility Annual Operating Expense*	\$161m/yr	\$146m/yr	-9%
CCS Auxiliary Load	25%	41%	+64%
Cost (Benefit) to Customers**	(\$1.14b)	(\$0.47b)	-59%

*Based on an 85% host unit annual capacity factor. Includes T&S fees (DOE – \$19.04/tonne; Phase 1 – \$18.00/tonne).

**Benefit is derived from the IRP preferred portfolio and compares to the next best option, the No CCS portfolio, which is Jim Bridger operating on coal with No CCS for both the 2025 IRP and the 2025 IRP Update.

8. Despite the higher estimated capture facility costs and auxiliary loads identified in Phase 1, preliminary economic modeling indicated that a carbon capture retrofit at Jim Bridger was likely a low-cost resource option in relation to the 2025 IRP preferred portfolio. As such, the

² The Company contracted Sargent and Lundy ("S&L") to be its owner's engineer for the Jim Bridger FEED study.

Company determined it was prudent to advance the FEED study to Phase 2 to further reduce project-specific uncertainty and refine cost and performance estimates through the incorporation of vendor-specific CCS designs and inputs.

9. Validating the Company's preliminary economic evaluation, the 2025 IRP Update published in March 2026 included CCS at Jim Bridger Units 3 and 4 in the preferred portfolio. A "No CCS" portfolio variant was modeled to determine the value of CCS compared to an alternative scenario where the model was not allowed to select CCS at the Jim Bridger units. The analysis indicated a net benefit of \$471 million compared to continuing to operate Jim Bridger Units 3 and 4 on coal without CCS, within the assumptions and constraints of the IRP modeling framework.

B. Phase 2 Overview

10. The Company completed Phase 2 in June 2026. Phase 2 consisted of a Front-End Loading ("FEL") Level 2 study to advance the design and cost estimates for the carbon capture facility as well as the associated balance-of-plant systems and plant tie-ins. The objective of this phase was to integrate vendor-specific designs (Mitsubishi, Fluor, BASF/Babcock and Wilcox)³ to refine project-specific costs and identify any fatal flaws. Phase 2 successfully refined the design and technical specifications developed during Phase 1, as well as provided additional insight into integration, operability, and other project-specific risks associated with a CCS retrofit at Jim Bridger Units 3 and 4. Due to the proprietary nature of PacifiCorp's carbon capture partners' technologies utilized in this study, certain findings and results from Phase 2 are subject to confidentiality restrictions.

³ *In re Rocky Mountain Power Application for the Annual Update to the Final Plan to Establish Low-Carbon Energy Portfolio Standards*, Docket No. 20000-681-EA-25 (Record No. 17784).

11. The integrated capital and operating cost estimates developed from Phase 2 are representative of an AACE Class 4 (-20% / +30%) cost accuracy level. Phase 2 estimates for operating and maintenance costs and auxiliary power requirements are generally consistent with Phase 1 results; however, Phase 2 identified greater variability in capital cost estimates across vendors compared to Phase 1. No changes were made to the estimated T&S offtake fee developed in Phase 1.

12. Using the vendor-specific inputs developed in Phase 2, the Company performed economic modeling for each vendor to evaluate the potential impact to customers under a Company owned and operated CCS resource. The analysis demonstrated that project economics are highly sensitive to the variability of the carbon capture facility capital costs identified in Phase 2. For example, certain vendor estimates would result in a higher cost portfolio when compared to a No CCS portfolio under ideal operating assumptions as summarized in Highly Confidential Exhibit 1.1.

13. To further assess the economic and operational risks associated with the project, the Company evaluated a range of sensitivities considered plausible at this stage of project development, inclusive of fluctuations in capital costs and operational disruptions to the CCS facilities. The Company believes it is reasonable to expect that the total capital costs derived from the Phase 2 study may increase as the project advances to a more detailed Phase 3 FEED study. The current Phase 2 estimates have an expected capital cost accuracy range of approximately -20% to +30%, indicating significant cost uncertainty for the carbon capture facility. This assumption aligns with other third-party studies. CCS retrofit studies at the Gerald Gentleman Station (“GGS”) and the San Juan Generating Station experienced a substantial increase in estimated capital costs as the projects matured from feasibility and pre-FEED level studies to a

FEED-level study—total projected capital costs increased by 41 and 33 percent, respectively.⁴ Given the unprecedented scale and complexity of the proposed Jim Bridger CCS project, there is a reasonable likelihood that the project’s capital costs will be towards the higher end of the Phase 2 accuracy band. When averaged across all three vendors, a project cost increase of just 11 percent to Jim Bridger CCS capital costs developed from Phase 2 will eliminate any potential benefit to customers as summarized in Highly Confidential Exhibit 1.1.

14. Furthermore, case studies from the Petra Nova and Boundary Dam CCS projects demonstrate that CCS facilities experience unplanned maintenance and outages and have not historically achieved 100 percent operational availability. After several years of startup and commissioning, both projects were reported to have operational availability of approximately 91 percent.⁵ When averaged across all three vendors, applying a CCS facility unplanned outage rate of just four percent to the Jim Bridger CCS project reduces 45Q tax credit benefit and eliminates any projected customer benefit when compared to the No CCS portfolio. In addition, extended startup and commissioning periods, that have not been included in this analysis, delay the start of carbon dioxide (“CO₂”) capture and the associated generation of 45Q tax credits which reduce project value during the early years of operation. Given the history of existing commercial coal CCS facilities, the Company believes a four percent unplanned outage rate for the CCS facility is a reasonable assumption for evaluating project economics.

15. The Phase 2 analysis demonstrates that the projected customer benefits of the Jim Bridger CCS project are not robust enough to withstand relatively modest changes in capital cost

⁴ The GGS studies and the SJGS FEED study can be found at www.osti.gov. The SJGS Pre-Feasibility Study summary (2019) is publicly available at www.powermag.com. Capital cost increases are on a \$/kW basis.

⁵ M. Monea et al., SaskPower’s BD3 Journey: Achieving Reliability at the Boundary Dam Unit 3 Carbon Capture Facility, GHGT-15 Conference Proceedings (2021) (91% operational availability achieved 2017 to 2019); U.S. Department of Energy, National Energy Technology Laboratory, Petra Nova Project: Final Scientific/Technical Report (2020) (91% operational availability achieved 2016 – 2020).

or operational performance assumptions. Given the scale and complexity of the proposed project as well as learnings from similar projects, the Company believes these sensitivities represent reasonable outcomes and underscore the risk associated with further development of a Company-led CCS project at Jim Bridger.

II. AFC PRE-FEED STUDY

16. In December 2025, PacifiCorp's project partners, 8 Rivers, completed a pre-FEED study of its proprietary AFC near-zero emissions coal power plant located at the Dave Johnston power plant. 8 Rivers has indicated to PacifiCorp that they will not be advancing the AFC project towards a FEED study at this time.

III. PROPOSED ACTIONS

17. Throughout the Jim Bridger CCS project development, the Company has identified key material challenges and risks that could significantly affect project viability or introduce substantial cost and risk exposure. These include, but are not limited to, environmental permitting hurdles; steam and electrical tie-in concerns; uncertainty regarding cost and liability from commercial partners (carbon capture technology vendors, engineering, procurement, and construction ("EPC") providers, and CO₂ T&S partners). These cumulative risks, as well as the potential liability that could reasonably occur across the CCS value chain in the utility owned and operated model, led PacifiCorp to conclude that further development of these technologies would be better explored by third-party developers.

18. To justify advancing the FEED study to Phase 3, and imposing additional costs on Wyoming customers, the Company would require a level of confidence in the project's economic benefits and overall commercial viability that does not exist at this time. It is also not anticipated

that Phase 3 alone would position the project for advancement to EPC contracting or a financial investment decision. Accordingly, Wyoming customers would not be expected to materially benefit from Phase 3 of the FEED study at this time.

19. Based on the findings from Phase 1 and 2 of the FEED study, the significant incremental cost required to execute Phase 3 as shown in Highly Confidential Exhibit 1.2, and the determination that a detailed FEED study would not meaningfully advance the project toward a final investment decision, the Company proposes not to proceed with a Company-led Phase 3 of the FEED study to limit further customer cost exposure.

20. Supporting this approach are recent developments associated with Project Tundra at Minnkota Power Cooperative's ("Minnkota") Milton R. Young Station. Minnkota evaluated multiple amine-based carbon capture technologies for Project Tundra over several years before switching to a third-party led development approach. Publicly available information suggests Minnkota has spent over \$38 million since 2019 on CCS development to-date. This includes \$25 million on site characterization work for CO₂ storage associated with the CarbonSAFE Phase III program,⁶ a \$13 million DOE-supported FEED study utilizing Fluor's Econamine FG Plus technology,⁷ and subsequent advancement with Mitsubishi Heavy Industries utilizing their KS-21 amine solvent system. Despite Minnkota's significant development investments to date, the project has not advanced to construction. In August 2026, Minnkota announced a joint development agreement with Reliant Carbon Capture & Storage, LLC ("Reliant"), whereby Reliant will assume primary responsibility for development of a cryogenic carbon capture project at the site.⁸

⁶ North Dakota CarbonSAFE Phase III: Site Characterization and Permitting (FE0031889). Available at www.netl.doe.gov.

⁷ U.S. Department of Energy, National Energy Technology Laboratory, Front-End Engineering & Design: Project Tundra Carbon Capture System, Agreement No. FE0031845. Available at www.netl.doe.gov.

⁸ Minnkota Power Cooperative, Project Tundra Announces Updated Development Structure and Expanded Economic Opportunities (Aug. 13, 2026).

21. Consistent with Wyo. Admin. Code Chapter 3, § 38(a)(ii), the Company notes that it received a proposal from Reliant in July 2026 related to potential carbon capture development opportunities at one or more of the Company's Wyoming coal-fired facilities. The Company continues to evaluate the proposal and engage in discussions with Reliant regarding the opportunity.

22. Deviation from the Company's Final Plan does not prevent future carbon capture development opportunities in Wyoming. PacifiCorp will continue to monitor policy, market, and technology developments and will maintain discussions with external developers. By doing so, the Company preserves the opportunity to advance carbon capture projects in the future should alternative commercial structures, risk-sharing arrangements, carbon market conditions, or environmental and/or tax policy emerge that materially improve the viability of carbon capture projects. The Company can also consider and explore the possibility of conducting an RFP process for third-party developed CCS solutions to determine if there have been unexpected changes in the market or technology developments.

IV. CONCLUSION

23. The Company submits this Amended Final Plan in support of the Company's 2026 Update. Based on its evaluation of the Phase 2 FEED study results, the Company concludes that advancing the Jim Bridger FEED study to Phase 3 would not be a prudent use of customer funds at this time, as Phase 3 would require significant investment without materially advancing the project toward a final investment decision or mitigating critical commercial and regulatory challenges associated with a carbon capture project.

24. Accordingly, the Company proposes to discontinue further Company-led advancement of the Jim Bridger FEED study. While the Company continues to evaluate the

viability of carbon capture projects at its Wyoming coal units, the Company respectfully requests the Commission to maintain the intermediate low-carbon energy portfolio standard at zero.

Submitted this 1st day of October, 2026.

A handwritten signature in black ink, consisting of stylized initials 'ZR' followed by a horizontal line.

Zachary Rogala

Attorney for Rocky Mountain Power

REDACTED

Rocky Mountain Power

Exhibit 1.1

Docket No. 20000-____-EA-26

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

REDACTED

Exhibit 1.1

FEED Study Phase 2 Economic Analysis

October 2026

JIM BRIDGER CARBON CAPTURE FEED STUDY PHASE 2 ANALYSIS

Rocky Mountain Power (the “Company”) submits this highly confidential exhibit in support of its First Amendment to the Final Plan (the “Amended Final Plan”). The economic analysis described below supports the Company's decision to cease advancement of Company-led development of the Jim Bridger front-end engineering and design (“FEED”) study.

As explained in the Amended Final Plan, the objective of Phase 2 of the Jim Bridger FEED study was to refine the cost and performance assumptions developed during Phase 1 by incorporating vendor-specific carbon capture designs from Mitsubishi Heavy Industries (“MHI”), Fluor, and BASF/Babcock & Wilcox (“B&W”). Upon completion of Phase 2, the Company evaluated the updated cost estimates developed by each vendor to determine whether the Jim Bridger carbon capture project would continue to provide an economic benefit to customers as indicated in the 2025 Integrated Resource Plan (“IRP”) Update. The 2025 IRP Update, which used Phase 1 cost estimates, includes the Jim Bridger carbon capture and storage (“CCS”) project in the preferred portfolio. A variant was modeled to evaluate the present value revenue requirement (“PVRR”) differential (“PVRR(d)”) where carbon capture was not available for selection, i.e., the “No CCS” variant. The No CCS portfolio was projected to have a \$471 million higher cost than the preferred portfolio (the “Baseline PVRR(d)”).

To evaluate the impact of the Phase 2 results, the Company calculated the change in PVRR resulting from replacing the Phase 1 cost estimates used in the 2025 IRP Update with each vendor's Phase 2 cost estimates. This incremental PVRR impact was then applied to the Baseline PVRR(d) of \$471 million to estimate the projected customer cost/(benefit) of each vendor's carbon capture project relative to the No CCS portfolio (the “Vendor PVRR(d)”).

Table 1 summarizes the Vendor PVRR(d) values.

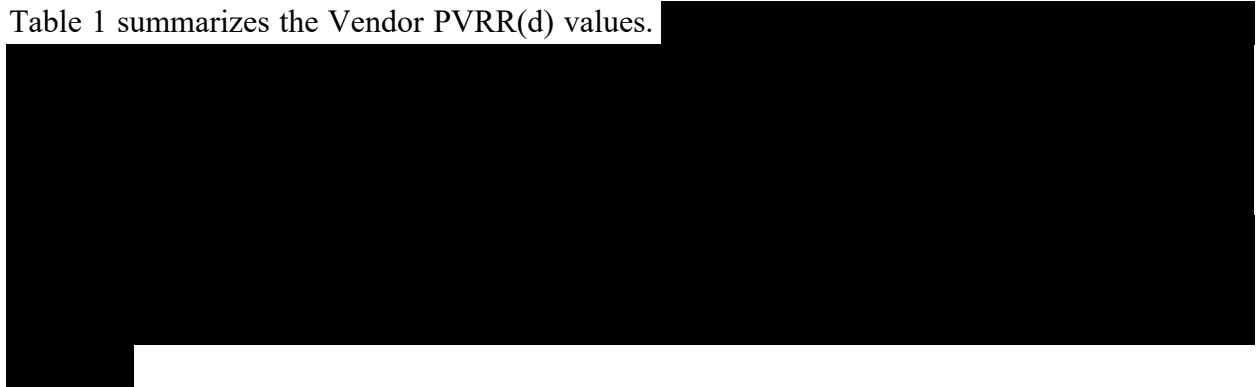


Table 1 –PVRR Analysis

Scenario	Vendor PVRR(d)
Phase 2 - MHI	
Phase 2 - Fluor	
Phase 2 – B&W/BASF	
Average	

The Jim Bridger CCS project would be the largest post-combustion carbon capture retrofit project evaluated for a coal-fired power plant, and none of the evaluated vendors have constructed and operated a project of comparable scale. As such, and for the reasons described in the Amended Final Plan, the Company also evaluated various sensitivities of the analysis by adjusting the capital cost as well as CCS operational availability and subsequent loss of 45Q tax credits. Table 2 and Table 3 present the capital cost increase and CCS operational downtime percentage, respectively, that would eliminate the averaged estimated portfolio benefit across the three Phase 2 vendor cases and result in an average Vendor PVRR(d) of zero.

Table 2 – PVRR Analysis with 10.9% Capital Cost Increase

Scenario	Vendor PVRR(d)
Phase 2 - MHI	
Phase 2 - Fluor	
Phase 2 - B&W	
Phase 2 Average	\$0

Table 3 – PVRR Analysis with 4.4% CCS Operational Downtime

Scenario	Vendor PVRR(d)
Phase 2 - MHI	
Phase 2 - Fluor	
Phase 2 - B&W	
Phase 2 Average	\$0

Relatively modest increases in capital costs (10.9 percent) or reductions in CCS operational availability (4.4 percent) materially affect portfolio economics and can eliminate the estimated portfolio benefit identified in the 2025 IRP Update. These results demonstrate that the economic viability of the Jim Bridger carbon capture project is highly sensitive to changes in project cost and operational performance. As explained in the Amended Final Plan, the Company believes these sensitivity cases are reasonable based on other similar projects.

REDACTED

Rocky Mountain Power

Exhibit 1.2

Docket No. 20000-____-EA-26

BEFORE THE WYOMING PUBLIC SERVICE
COMMISSION

ROCKY MOUNTAIN POWER

REDACTED

Exhibit 1.2

FEED Study Phase 3 Incremental Cost

October 2026

JIM BRIDGER CARBON CAPTURE FEED STUDY PHASE 3 COST ESTIMATES

Rocky Mountain Power (the “Company”) is submitting this highly confidential exhibit in support of its First Amendment to the Final Plan (the “Amended Final Plan”).

During Phase 2 of the Jim Bridger FEED study, the Company requested firm-price proposals from each of the three carbon capture technology vendors participating in the study to perform the scope of work associated with Phase 3. [REDACTED]

The proposals received from the carbon capture vendors, together with the firm-price proposal submitted by the Company’s owner’s engineer, Sargent & Lundy, LLC (“S&L”), for Phase 3 services as well as expected reimbursement from the Wyoming Energy Authority’s Energy Matching Funds ("EMF") program, are summarized in Table 1 below. [REDACTED]

Table 1 – Phase 3 Cost Estimates

Carbon Capture Vendor	Carbon Capture Vendor Bid	S&L Cost	Total Phase 3 Cost	EMF Grant Reimbursement (Est.)	Schedule 198 Phase 3 Cost (Est.)
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]