

July 2, 2025

VIA ELECTRONIC FILING

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

Attention:	Gary Widerburg
	Commission Administrator

Re: Docket No. 16-035-27 - In the Matter of the Application of Rocky Mountain Power for Approval of a Renewable Energy Services Contract between Rocky Mountain Power and Facebook, Inc. Pursuant to Tariff Electric Service Schedule 34

Rocky Mountain Power's Second Compliance Report

Rocky Mountain Power (the "Company") hereby submits for filing its second compliance report ("Report") in accordance with the Order Memorializing Bench Ruling Approving Renewable Energy Service Contact with Facebook, Inc. issued by the Commission in Docket No. 16-035-27 on August 29, 2016 ("Order").

Background

On June 21, 2016, the Company filed for approval of a renewable energy service contract under Electric Service Schedule No. 34 – Renewable Energy Purchases for Qualified Customers 5000kW and Over with Meta Platforms, Inc. In the confidential rebuttal testimony of Company witness Paul H. Clements, the Company agreed to certain reporting requirements to address recommendations made by the Office of Consumer Services ("OCS"). In the Order, the Commission approved the renewable energy services contract and noted the reporting requirements. Reporting is required every other year for a period of six years for three reports in total. The third and final report will be filed on or about June 30, 2027.

Accordingly, the Company files the second Report containing the information enumerated in Mr. Clements' rebuttal testimony for calendar year 2024. A detailed list of the required information is provided in the attached Confidential File Index. The Report contains sensitive customer-specific information that is highly confidential. Pursuant to Commission Rule R746-1-601(2)(a), certain information has been labeled highly confidential and will be provided to the Commission and its staff, the Division of Public Utilities ("Division"), the Office of Consumer Services ("Office"), and those listed within R741-1-602 that may be involved in this proceeding. Confidential and highly confidential information is provided subject to Commission Rule R746-1-601-606.

One of the reporting requirements is for the Company to provide a net power cost analysis using the GRID model as well as access to the model. The Company discontinued using the GRID model

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and has transitioned to the Aurora production cost model developed by Energy Exemplar, LLC (Energy Exemplar). In response to this reporting requirement, three confidential Excel files are provided containing the results of the net power cost studies from the Aurora model. In addition, the Company has provided five files in a zipped confidential folder, Aurora FB NPC 15.0.1016 CONF Archive.zip, which require access to the Aurora application to be able to open and utilize the Aurora NPC project(s) relevant to this information. If the Commission or an intervening party already procures user licenses directly from Energy Exemplar for Aurora and Gurobi, they will be able to access the provided Aurora NPC project(s) for this proceeding using their existing user licensing. If the Commission or an intervening party requires a user license for Aurora (and Gurobi) for use in this proceeding, the request should be submitted through the data request process, if applicable, or by contacting Max Backlund at max.backlund@pacificorp.com. PacifiCorp can procure temporary intervenor licenses for Aurora (and Gurobi) from Energy Exemplar for a limited / fixed duration for use in this proceeding. The temporary intervenor licenses would be provided pursuant to existing agreements between Berkshire Hathaway Energy (BHE) and Energy Exemplar. Access to the Aurora (and Gurobi) applications are obtained directly from Energy Exemplar subject to the terms and conditions of the confidentiality protections relevant to this proceeding and the execution of a non-disclosure agreement (NDA) between Energy Exemplar and the requesting intervenor. Documentation for Aurora is contained within the software. Within the software, please refer to the "Help" feature located on the "Home" tab, within the "Information" section for the user manual.

The Company notes the required information was established in 2016 based on the Renewable Energy Service Contract ("RESC"), which has been amended since that time.¹ As with other ongoing reports, the Company recognizes that modifications to the reporting requirements may be necessary to reflect the current RESC. The Company is committed to providing information to help the Commission, Division of Public Utilities and the OCS review the various components of the RESC.

The Company respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred):	<u>datarequest@pacificorp.com</u> max.backlund@pacificorp.com
By regular mail:	Data Request Response Center PacifiCorp 825 NE Multnomah Street, Suite 2000 Portland, OR 97232

¹ See Docket No. 22-035-30.

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Sincerely,

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Director, Regulation and Regulatory Operations

Enclosures

CC: Division of Public Utilities Office of Consumer Services

CERTIFICATE OF SERVICE

Docket No. 16-035-27

I hereby certify that on July 2, 2025, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov ocs@utah.gov **Division of Public Utilities** dpudatarequest@utah.gov **Assistant Attorney General** Patricia Schmid pschmid@agutah.gov Robert Moore rmoore@agutah.gov Patrick Grecu pgrecu@agutah.gov **Rocky Mountain Power** Data Request Response datarequest@pacificorp.com Center Jana Saba

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Max Backlund

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Carrie Meyer Manager, Discovery & Regulatory Operations

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