

May 22, 2025

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. 17-035-40
**Application for Approval of a Significant Energy Resource Decision and Voluntary
Request for Approval of Resource Decision**
New Wind and Transmission Report for CY 2024

In accordance with the Order issued by the Public Service Commission of Utah (“Commission”) on June 22, 2018 (“Approval Order”) and the Order on Reporting Requirements issued on October 22, 2018 (“Reporting Order”) and the Order on issued on July 21, 2021 (“First Report Order”) the in the above-referenced docket, Rocky Mountain Power (“Company”) submits its annual New Wind and Transmission Report for calendar year 2024.

Background

In Section 3.e. of the Approval Order, the Commission conditioned its approval for the new wind and transmission projects (“Combined Projects”) on the Company filing a report with the following information (“Required Information”):

- (i) final project costs for each specific project that comprises the Wind Projects and the Transmission Projects;
- (ii) realized PTC benefits from the Combined Projects;
- (iii) realized energy benefits from the Combined Projects;
- (iv) transmission costs of the Transmission Projects that are actually offset by revenues derived from wholesale transmission customers;
- (v) payments for any damages, including liquidated damages, paid to PacifiCorp related to the Combined Projects;
- (vi) contribution to the 230 kV Network Upgrades’ total cost from interconnection customers;
- (vii) annual revenue requirement associated with the Aeolus to Bridger/Anticline Line and the incremental transmission revenue resulting from the construction of the line;
- (viii) wind operations and maintenance costs associated with the Wind Projects that PacifiCorp owns;
- (ix) realized value of RECs sold associated with the generation from the Wind Projects;

- and
 (x) other information PacifiCorp deems necessary or appropriate.

The Approval Order required the Company to propose a reporting system that includes the start date, frequency, duration, level of granularity and confidentiality of the Required Information by September 1, 2018. Through a separate process that included a comment and reply comment period, a reporting template was approved by the Commission in their Reporting Order to provide the Required Information.

Approved Reporting System

Table 1 below summarizes the approved reporting system for the Required Information along with the additional details requested by the Commission (start date, frequency, duration, and confidentiality) that was established in the Approval Order and modified by the Commission in its September 8, 2023 Order approving the New Wind and Transmission Report for CY 2022.

Table 1 Revised Reporting Requirements of the Combine Projects (Docket No. 17-035-40)				
Required Information	Start Date	Frequency¹	Duration	Confidentiality
(i) final project costs for each specific project	12 ME CY 2020, due 4/30/2021	annually	10 years	Confidential
(ii) realized PTC benefits	12 ME CY 2020, due 4/30/2021	annually	10 years	Confidential
(iii) realized energy benefits	12 ME CY 2020, due 4/30/2021	annually	10 years	Non-confidential
(iv) transmission costs of the Transmission Projects that are actually offset by revenues derived from wholesale transmission customers	12 ME CY 2020, due 4/30/2022	annually	10 years	Non-confidential
(v) payments for any damages, including liquidated damages	Included in annual reports, as applicable	annually	10 years	Confidential
(vi) contribution to the 230 kV Network Upgrades' total cost from interconnection customers	12 ME CY 2020, due 4/30/2022	annually	10 years	Confidential
(vii) annual revenue requirement associated with the Aeolus to Bridger/Anticline Line and the incremental transmission revenue resulting from the construction of the line	12 ME CY 2020, due 4/30/2022	annually	10 years	Non-confidential
(viii) wind operations and maintenance costs associated with the Wind Projects that PacifiCorp owns	12 ME CY 2020, due 4/30/2021	annually	10 years	Non-confidential
(ix) realized value of RECs sold	12 ME CY 2020, due 4/30/2021	annually	10 years	Confidential

Footnote 1: beginning 5/25/2023, the report will be due annually on May 25.

The Company hereby submits Confidential Attachment 1: RMP's New Wind and Transmission Report for CY 2024, which is the reporting template that was approved by the Commission in its Reporting Order that has been populated with the Required Information for calendar year 2024. Footnotes have been added as needed to explain or provide additional detail. Attachment As acknowledged in the Company's August 8, 2023 reply comments, Confidential Attachment 1 contains both confidential and non-confidential information. Since the tabs are interlinked, the Company submits the Report in its native form as a confidential Excel file with all the tabs; however, the Company also submits the non-confidential information as a pdf.

Rocky Mountain Power respectfully requests that all formal correspondence and requests for additional information regarding this filing be addressed to the following:

By E-mail (preferred): datarequest@pacificorp.com
 max.backlund@pacificorp.com

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

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Jana Saba".

Jana Saba
Director, Regulatory Affairs

CERTIFICATE OF SERVICE

Docket No. 17-035-40

I hereby certify that on May 22, 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

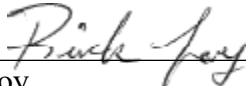
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Rick Loy
Coordinator, Regulatory Operations

**Confidential Tabs will be provided
Under a separate cover**

Allocation Factors

43.66%	Dec 2020 Results of Operations SG factor
44.14%	Dec 2021 Results of Operations SG factor
44.32%	Dec 2022 Results of Operations SG factor
44.32%	Dec 2023 Results of Operations SG factor
45.12%	Dec 2024 Results of Operations SG factor

Energy Benefits (NPC)

12 Months Ended December 31, 2024 - Actuals

Cedar Springs Wind II (BTA)

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	HLH Generation (MWh)	HLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	HLH Energy Benefits (Loss) (a) x (b) - (c)	LLH Generation (MWh)	LLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	LLH Energy Benefits (Loss) (e) x (f) - (g)	Total Energy Benefits (Loss) (d) + (h)
Jan-24	26,924	91.38	2.03	2,405,325	21,696	69.11	2.03	1,452,684	3,858,009
Feb-24	29,333	36.85	2.03	1,024,308	22,822	38.33	2.03	828,915	1,853,223
Mar-24	30,577	13.00	2.03	335,430	26,504	21.27	2.03	509,917	845,346
Apr-24	31,318	3.50	2.03	104,037	26,197	8.00	2.03	120,376	189,614
May-24	30,043	30.00	2.03	840,303	24,746	17.06	2.03	371,822	1,212,125
Jun-24	32,986	44.67	2.03	1,406,523	25,057	26.00	2.03	600,616	2,007,139
Jul-24	14,067	83.96	2.03	1,152,461	12,604	47.26	2.03	599,953	1,722,435
Aug-24	15,719	67.54	2.03	1,029,699	17,389	27.61	2.03	444,830	1,474,529
Sep-24	20,455	86.00	2.03	1,717,806	21,272	23.99	2.03	458,644	2,176,450
Oct-24	20,388	41.20	2.03	798,662	20,363	34.91	2.03	699,517	1,468,179
Nov-24	33,054	31.30	2.03	967,340	29,598	34.09	2.03	948,967	1,916,308
Dec-24	97,294	44.60	2.03	4,156,473	35,646	37.29	2.03	1,367,037	5,523,510
12 Months Ended December 31, 2024				13,320,788				8,243,978	21,663,866

Notes:

HLH = heavy load hour
LLH = light load hour
MWh = megawatt-hours

Incremental Generation = Wind Plant Generation MWh – Base Wind Plant Generation MWh

NPC Incremental Savings

= [Incremental Gen_{HLH} × (Monthly Market Price_{HLH} – Integration Costs)] + [Incremental Gen_{LLH}

× (Monthly Market Price_{LLH} – Integration Costs)]

NPC Benefit = NPC Incremental Savings × EBA Sharing Band, if applicable

Where:

Incremental Generation = The increase in generation at the wind plants due to the Wind Projects

Wind Plant Generation MWh = The wind plant generation associated with the Wind Projects

Base Wind Plant Generation MWh = The wind plant generation associated with the Wind Projects that is included in base rates.

Incremental Gen_{HLH} = The increase in generation at the wind plant due to the Wind Projects during heavy load hours

Incremental Gen_{LLH} = The increase in generation at the wind plant due to Wind Projects during light load hours

Monthly Market Price_{HLH} = Heavy load hour monthly market price

Monthly Market Price_{LLH} = Light load hour monthly market price

Integration Costs = Wind integration costs from the most recent IBP

Heavy load hours ("HLH") and light load hours ("LLH") are defined by the Western Electricity Coordinating Council ("WECC") as: HLH – 0600 through 2200 hours, Monday through Saturday, excluding North American Electric Reliability Corporation ("NERC") holidays, and LLH – 2200 through 0600 hours, Monday through Saturday, and all day Sunday and on the six NERC Holidays (New Year's, Memorial Day, Independence Day, Labor Day, Thanksgiving, and Christmas). For all hours, Pacific Prevailing Time is used.

Energy Benefits (NPC)

12 Months Ended December 31, 2024 - Actuals

Ekota Flats Wind

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	HLH Generation (MWh)	HLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	HLH Energy Benefits (Loss) (a) x (b) - (c)	LLH Generation (MWh)	LLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	LLH Energy Benefits (Loss) (e) x (f) - (g)	Total Energy Benefits (Loss) (d) + (h)
Jan-24	40,535	91.38	2.03	3,621,600	28,796	69.11	2.03	1,931,636	5,553,236
Feb-24	46,135	36.85	2.03	1,662,960	33,459	38.33	2.03	1,213,947	2,866,907
Mar-24	44,984	13.00	2.03	493,474	29,135	21.27	2.03	560,535	1,054,009
Apr-24	40,571	3.50	2.03	140,639	23,447	8.00	2.03	199,976	289,615
May-24	38,830	30.00	2.03	1,086,327	22,535	17.06	2.03	338,601	1,424,928
Jun-24	44,025	44.67	2.03	1,877,226	19,640	26.00	2.03	476,771	2,347,997
Jul-24	23,824	83.96	2.03	1,951,853	8,904	47.26	2.03	402,636	2,354,489
Aug-24	26,741	67.54	2.03	1,781,714	14,812	27.61	2.03	378,907	2,130,621
Sep-24	22,148	86.00	2.03	1,889,768	9,807	23.99	2.03	211,448	2,071,215
Oct-24	34,401	41.20	2.03	1,347,566	13,493	34.91	2.03	443,638	1,791,204
Nov-24	43,964	31.30	2.03	1,286,626	32,135	34.09	2.03	1,030,308	2,316,935
Dec-24	54,280	44.60	2.03	2,327,934	49,891	37.29	2.03	1,789,148	4,097,082
12 Months Ended December 31, 2024				15,346,724				8,881,568	23,228,292

Notes:

HLH = heavy load hour
LLH = light load hour
MWh = megawatt-hours

Energy Benefits (NPC)

12 Months Ended December 31, 2024 - Actuals

TB Flats Wind

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
	HLH Generation (MWh)	HLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	HLH Energy Benefits (Loss) (a) x (b) - (c)	LLH Generation (MWh)	LLH Monthly Market Price (\$/MWh)	Integration Cost (\$/MWh)	LLH Energy Benefits (Loss) (e) x (f) - (g)	Total Energy Benefits (Loss) (d) + (h)
Jan-24	77,940	91.38	2.03	6,965,540	54,046	69.11	2.03	3,625,540	10,591,080
Feb-24	78,162	36.85	2.03	2,729,417	54,248	38.33	2.03	1,966,383	4,695,800
Mar-24	84,086	13.00	2.03	922,423	56,044	21.27	2.03	1,078,243	2,000,667
Apr-24	67,400	3.50	2.03	119,668	41,140	8.00	2.03	241,666	361,334
May-24	78,503	30.00	2.03	2,197,127	43,719	17.06	2.03	666,902	2,864,030
Jun-24	82,977	44.67	2.03	3,536,139	43,796	26.00	2.03	1,048,780	4,587,920
Jul-24	48,384	83.96	2.03	3,713,220	18,311	47.26	2.03	833,737	4,546,957
Aug-24	55,731	67.54	2.03	3,650,762	33,005	27.61	2.03	844,305	4,495,067
Sep-24	38,366	86.00	2.03	3,223,272	21,235	23.99	2.03	497,846	3,681,118
Oct-24	48,869	41.20	2.03	1,915,135	22,532	34.91	2.03	765,032	2,655,867
Nov-24	70,552	31.30	2.03	2,064,736	53,299	34.09	2.03	1,708,866	3,773,602
Dec-24	104,464	44.60	2.03	4,461,028	94,085	37.29	2.03	3,543,540	7,984,568
12 Months Ended December 31, 2024				35,823,468				18,367,848	52,071,316

Notes:

HLH = heavy load hour
LLH = light load hour
MWh = megawatt-hours

Transmission Costs

Adapted from the attachment included in PacifiCorp's response to data request
DPU 11.6 in Docket No. 17-035-40. Formula rate references refer to the true-up.

Line	Description/Source	Calculation	CY 2024
1	Annual Transmission Revenue Requirement:		
	Formula rate Appendix A, Line 170 (Net Zonal Revenue Req.) ⁽¹⁾		573,966,174
2	12 CP Monthly Peak (MW):		
	Formula rate Appendix A, Line 171		14,292
3	Rate (\$/MW-year)	[Line 1 / Line 2]	40,159
4	(\$/MW-month)	[Line 3 / 12]	3,347
5	Total PacifiCorp ESM Network Load volume plus Behind-The-Meter:		
	Formula rate Attachment 9b, cols. 'e' and 'Behind-the-Meter'		109,361
6	Total Revenue from PacifiCorp ESM Network Load	[Line 5 x Line 4]	365,983,582
7	As percent of all network and long-term point-to-point	[Line 6 / Line 1]	63.8%
8	PacifiCorp ESM long-term point-to-point volume:		
	Formula rate Attachment 9b, column 'g1'		22,735
9	Loss rate:		
	PacifiCorp OATT Schedule 10		4.30%
10	PacifiCorp ESM long-term point-to-point volume with losses:	[Line 8 x (1 + Line 9)]	23,713
11	Total Revenue from PacifiCorp ESM long-term point-to-point (with losses)	[Line 10 x Line 4]	79,355,749
12	As percent of all network and long-term point-to-point	[Line 11 / Line 1]	13.8%
13	ESM network and LT PTP as percent of total network and LT PTP	[Line 7 + Line 12]	77.6%
14	Percentage of revenues from third party wholesale transmission customers	[1 - Line 13]	22.4%

Footnotes:

1. does not include short-term revenue

Annual Revenue Requirement - Aeolus to Bridger/Anticline Line and Incremental Transmission Revenue

\$-Thousands			(m)	(n)	(o)	(p)
			2024 Energy Gateway			
Line No.	Reference		Total Company	Factor	Factor %	Utah Allocated
Plant Revenue Requirement						
1	Footnote 1	Capital Investment	647,713,651	SG	45.1209%	292,254,426
302	Footnote 1	Depreciation Reserve	(40,466,784)	SG	45.1209%	(18,258,989)
303	Footnote 1	Accumulated DIT Balance	(40,571,361)	SG	45.1209%	(18,306,175)
304	sum of lines 1-3	Net Rate Base	566,675,507			255,689,261
305	line 29	Pre-Tax Rate of Return	8.994%			8.994%
306	line 4 * line 5	Pre-Tax Return on Rate Base	50,964,938			22,995,854
307	Footnote 2	Wholesale Wheeling Revenue	(15,186,456)	SG	45.1209%	(6,852,270)
308		Operation & Maintenance	-	SG	45.1209%	-
309		Depreciation	11,216,248	SG	45.1209%	5,060,875
310	line 30 * prev. yr-end net plant	Property Taxes	5,584,699	GPS	44.3259%	2,475,468
311		Wind Tax	-	SG	45.1209%	-
312	sum of lines 6-11	Total Plant Revenue Requirement	52,579,429			23,679,927
Net Power Cost						
313		NPC Incremental Savings	-	SG	45.1209%	-
PTC Benefit						
314		PTC Benefit	-	SG	45.1209%	-
315		PTC Benefit in Base Rates	-	SG	45.1209%	-
316	sum of lines 14 and 15	Net PTC	-			-
317	line 16 * (line 28 - 1)	Gross- up for taxes	-			-
318	sum of lines 16 and 17	PTC Revenue Requirement	-			-
319	sum of lines 12, 13, 18	Rev. Requirement	52,579,429			23,679,927
Adjustment for EBA Pass-through						
320	line 7	Wholesale Wheeling Revenue				(6,852,270)
321	UT EBA Sharing %	Percentage included in EBA (100%)				100%
322	line 20 * line 21	EBA Pass-through				(6,852,270)
323	line 13	NPC Incremental Savings				-
324	UT EBA Sharing %	Percentage included in EBA (100%)				100%
325	line 23 * line 24	EBA Pass-through				-
326	line 19 - line 22 - line 25	Rev. Req't. after EBA Pass-through				30,532,197
327		Federal/State Combined Tax Rate	24.587%			
328		Net to Gross Bump up Factor = (1/(1-tax rate))	1.3260			
329		Pretax Return	8.994%			
330	Footnote 3	Property Tax Rate	0.91%			
331	Footnote 4	Utah SG Factor	45.1209%			
332	Footnote 4	Utah GPS Factor	44.3259%			

Footnotes:

1) Average Balances

2) Wholesale Wheeling Revenue = percentage of third-party transmission revenues from tab (iv) Transmission Costs, line 14 * Aeolus to Bridger/Anticline line revenue requirement

3) Calculated from Docket No. 20-035-04

4) Allocation factors are from the Company's Results of Operations reports for the respective filing periods

**Wind O&M Costs for PacifiCorp Owned Projects
12 Months Ended December 31, 2024**

Resource	<i>Actual</i>		
	Total O&M	UT Allocated	Months
Cedar Springs Wind II (BTA)	6,592,865	2,974,762	12
Ekola Flats Wind	3,220,021	1,452,903	12
TB Flats Wind	6,237,191	2,814,279	12
TOTAL	\$ 16,050,077	\$ 7,241,944	

<i>Projected at Preapproval (1)</i>
Total O&M
4,197,855
5,498,386
11,612,821
21,309,062

Footnotes:

1) Source for projections at preapproval: Docket No. 17-035-40, Rick T. Link Confidential workpaper EV2020 Second Supp Results Summary File, Tab 'Wind Costs', rows 26-29 (Feb. 16, 2018)