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Division of Public Utilities
UTAH DEPARTMENT OF COMMERCE

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Action Request Response

To: Public Service Commission of Utah

From: Utah Division of Public Utilities

Chris Parker, Director
Brenda Salter, Assistant Director
Doug Wheelwright, Utility Technical Consultant Supervisor
Matthew Pernichele, Utility Technical Consultant
David Williams, Utility Technical Consultant

Date: July 27, 2026

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 2025*

Recommendation (Acknowledge)

Utah Division of Public Utilities (Division) has reviewed and analyzed PacifiCorp's (Company or RMP) New Wind and Transmission Report for CY 2025 (2025 Wind Report). The 2025 Wind Report complies with the reporting requirements mandated by the Public Service Commission of Utah (Commission) and is in the same format as previously acknowledged reports in this docket. The Division recommends that the Commission acknowledge the 2025 Wind Report.

Background

On June 30, 2017, RMP filed an application in this docket seeking Commission approval of several wind generation projects and supporting transmission infrastructure as required by Utah's Energy Resource Procurement Act.[1] These projects were the Cedar Springs windfarm (through a Build Transfer Agreement), the Ekola Flats windfarm, the TB Flats I and II windfarms (collectively Wind Projects), network upgrades to certain 230kv transmission lines, and the Aeolus to Bridger/Anticline transmission line (collectively

[1] Utah Code Ann. § 54-17-101 et seq.

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Transmission Projects). The combination of the individual projects, collectively the Wind Projects and Transmission Projects are herein referred to as Projects.

The Commission approved the Projects on June 22, 2018[2] and ordered RMP to report annually on certain aspects of the Projects.[3] The Commission clarified these requirements in a subsequent order.[4] The Company met these requirements by submitting an Excel spreadsheet with nine tabs to report on each of the nine distinct reporting requirements; the Company updates this spreadsheet each year and submits it with its annual report. The requirements (Reporting Requirements) are summarized in Table 1.

Table 1
Annual Reporting Requirements of the Combined Projects
Filed Annually for 10 years, Due on May 25 of each year[5]

Required Information	Duration	Confidentiality
(i) final project costs for each specific project		Confidential
(ii) realized Production Tax Credit (PTC) benefits		Confidential
(iii) realized energy benefits		Non-confidential
(iv) transmission costs of the Transmission Projects that are offset by revenues derived from wholesale transmission customers		Non-confidential
(v) payments for any damages, including liquidated damages		Confidential
(vi) contribution to the 230 kV Network Upgrades' total cost from interconnection customers		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		Non-confidential
(viii) wind operations and maintenance costs associated with the Wind Projects that PacifiCorp owns		Non-confidential
(ix) realized value of Renewable Energy Credits (RECs) sold		Confidential

The Commission's most recent Order[6] made no additional changes to the Reporting

[2] Order (June 22, 2018).
[3] *Id.* at 35-36.
[4] Order on Reporting Requirements (October 22, 2018).
[5] Order on Reporting Requirements, at 5 (October 22, 2018)
[6] Order Acknowledging Report and Granting Motion to Withdraw (October 20, 2025).

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Requirements.

On May 22, 2026, RMP filed the 2025 Wind Report, and the Commission issued an Action Request asking the Division to "Review for Compliance and Make Recommendations" on the report by July 21, 2026. The Commission later changed this deadline to July 27, 2026.[7]

Discussion

The 2025 Wind Report is in substantially the same format as the previous wind reports. The filing includes an Excel spreadsheet with nine tabs corresponding to the nine Reporting Requirements with new year's annual data added below that of previous years (2025 Spreadsheet). The new data for each Reporting Requirement is discussed below.

(i) Final Project Costs (Confidential)

This tab summarizes the booked total cost of each of the Projects. [redacted]

(ii) Realized PTC Benefits (Confidential)

This tab calculates the value of the PTCs produced by each of the Wind Projects by multiplying the energy produced by each circuit by the value of a PTC. These values are then grossed up to account for taxes. A circuit is a subgroup of wind turbines within a windfarm on a common electrical connection. PTC value is adjusted for inflation each year. For 2025 the value of each of these PTCs was [redacted].

[7] Notice of Filing and Comment Period (May 26, 2026).
[8] Redacted Comments from the Division of Public Utilities at 12 (DPU Exhibit 2, *Rocky Mountain Power Response to DPU Data Request 35.2*) (June 25, 2025).
[9] *Id.* at 5.

Redacted

Tab (ii) also shows the total production, in kWh, for each windfarm for each month of the year. These production totals for 2025 match the totals reported in Tab (iii) Energy Benefits and in the Company's Results of Operations for 2025.[10]

The actual values of the PTC credits for each Wind Project are also compared to the projected value from the original filing. The 2025 Wind Report shows that the value of PTCs produced by the Wind Projects was [redacted] projected in the Company's original application.[11]

Tab (ii) also shows when each circuit's qualification to produce PTCs expires, which is ten years after being placed into service.

(iii) Realized Energy Benefits

Tab (iii) calculates the realized energy benefits from each windfarm by multiplying its monthly generation by the monthly market price minus integration costs for both high load hours (HLH) and low load hours (LLH). The realized energy benefit is a measure of the value of the energy produced by the Wind Farms. It is not a complete comparison to an alternative scenario where the Wind Farms were not constructed, because it doesn't account for all of the costs incurred by the Wind Farms (notably excluding O&M and capital costs, for example), but it is a useful measure of their relative value year to year.

As noted in previous Division comments in this docket,[12] the Wind Projects continue to generate less power than RMP projected when it applied for Commission approval of the Wind Projects (see Table 2 below). This docket now contains 5 years of production data from the Wind Projects showing that their performance is fairly consistent and is unlikely to increase to the levels originally projected.

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[10] *Utah 2025 Annual Report,* Docket No. 26-035-09, CONFIDENTIAL RMP Attachment 2 – 2025 Wind Resource Generation Summary (April 28, 2026).

[11] 2025 Spreadsheet, Confidential Tab (ii) PTC Benefits, cell M264 (May 26, 2026).

[12] Redacted Comments from the Division of Public Utilities at 5 (July 25, 2023); Redacted Comments from the Division of Public Utilities at 5 (July 30, 2024); Redacted Comments from the Division of Public Utilities at 5-6 (July 21, 2025).

Redacted

Table 2

[redacted]

A small amount of the shortfall between the projected and actual output of the Wind Projects is due to curtailment. Generally, the curtailment of resources with zero fuel costs should be avoided whenever possible to prudently manage generation and minimize net power costs. The Company reported that the Wind Projects were curtailed a combined [redacted] in 2025.[13] This is a [redacted] of curtailments reported in the 2024 Wind Report.[14]

In the 2024 Wind Report the Company cited "economic curtailment" as the cause of curtailments over 1 MWh.[15] When asked a similar data request during the investigation of the 2025 Wind Report, RMP provided a table showing curtailment due to scheduled and unscheduled maintenance and "availability" which accounted for the bulk of curtailments.[16] The Company also noted that Cedar Springs II curtailed some turbines to protect birds ("avian curtailment").[17] The Wind Projects curtailment during 2025 was still minor, [redacted] The Division is hopeful that RMP's recent acquisition of several battery storage facilities[18] will reduce the need for future curtailments.

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[13] DPU Exhibit No. 1 – RMP CONFIDENTIAL Attachment DPU 36.2 – Curtailment.
[14] DPU Exhibit No. 2 – RMP Response to DPU DR 35.4(1) – Curtailment.
[15] *Id.*
[16] DPU Exhibit No. 2 – RMP Response DPU DR 36.2(3) – Curtailment, CONFIDENTIAL.
[17] *Id.*
[18] PacifiCorp's 2025 Integrated Resource Plan, Volume 1, p. 4 and 19, (last visited July 13, 2026) https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025_IRP_Vol_1.pdf

Redacted

Tab (iii) also subtracts integration cost from the Wind Projects energy benefits. The integration cost is the estimated incremental cost to maintain flexible reserve generation or storage capacity sufficient to replace intermittent generation when it is unable to generate power. The integration cost that is used to calculate the energy benefit in this docket is calculated in the most recent PacifiCorp IRP.[19] The integration cost of the Wind Projects decreased slightly from $2.03/MWh in 2024 to $1.72/MWh in 2025.

(iv) Transmission Costs

Tab (iv) Transmission Costs reports "transmission costs of the Transmission Projects that are actually offset by revenues derived from wholesale transmission customers."[20] The June 22, 2018 Order defines Transmission Projects as the specific transmission facilities approved in this docket.[21] Tab (iv) reports this information in a detailed way but for all of the transmission in the PACE balancing area (Net Zonal Revenue Requirement), not for the Transmission Projects specifically. The transmission cost information has been reported in this form since the first Wind Report in 2021 and the Commission has acknowledged each of these reports.

This is useful information and the Division has no reason to question its accuracy. But reporting the transmission revenue requirement for all the transmission in PACE does not offer evidence to address the prudence of the decision to build the Transmission Projects that were the subject of this docket. This tab of the Wind Report appears to be directly based on the Company's suggested template[22] which the Division endorsed.[23] It is unclear from the record if RMP tracks these projects individually and thus can issue a report that more closely complies with the Commission's order. The Division takes no position on whether Tab (iv) can or should be changed in future wind reports.

Tab (iv) shows a dramatic 59% increase in the annual transmission revenue requirement for PACE and accompanying increases in cost flowing from that revenue requirement increase.

[19] DPU Exhibit No. 2 – RMP Response to DPU DR 35.6(1) – Integration Costs.
[20] Order at 35 -36 (June 22, 2018).
[21] *Id.*at 5.
[22] RMP Attachment A, Proposed Reporting System for the Combined Projects (August 31, 2018).
[23] DPU Attachment 1, Division's Recommendations for Reporting on the Wind and Transmission Projects to the Company Attachment A, (October 1, 2018).

Redacted

The Division understands that this is due in part to large segments of the Gateway South and Gateway West transmission lines being placed into service in late 2024 and 2025.

(v) Liquidated Damages (Confidential)

Tab (v) shows liquidated damages collected by RMP from suppliers who failed to meet contract commitments. The total amount of liquidated damages for 2025 reported in the 2025 Wind Report [redacted]

The Division did note that the 2025 liquidated damages were reported as negative numbers while all previous liquidated damages had been reported as positive numbers. In response to a data request,[24] the Company explains that liquidated damages are booked as negative costs and they were accidentally kept as negative numbers during the preparation of the 2025 Wind Report.

(vi) 230kv Network Upgrades (Confidential)

Tab (vi) tracks the cost of network upgrades to the existing 230kv transmission system to accommodate the Wind Farms. These values have remained unchanged since 2021.

(vii) Aeolus to Bridger Revenue Requirement and Revenue

Tab (vii) shows the annual revenue requirement and its Utah allocation, for the newly constructed Aeolus to Bridger transmission line. The calculation is consistent with previous years and the SG and GPS factors used to allocate the expense for Utah have been properly changed each year. Wheeling revenue on this line decreased by 29% from $6,852,270 in 2024 to $4,858,949 in 2025.

(viii) Wind O&M

Tab (viii) reports operations and maintenance (O&M) costs for the Wind Farms and their Utah allocation. Like every reported year before it, 2025's O&M expenses were less than

[24] DPU Exhibit No. 2 – RMP Response to DPU DR 36.3 – Liquidated Damages.

Redacted

those projected when the Wind Projects were proposed. The Company has confirmed that all of these costs have been expensed and not capitalized.[25]

(ix) REC Value (Confidential)

Tab (ix) RECs reports the number of renewable energy credits (RECs) sold for each windfarm by month, the price per REC, and the buyer. The total number of RECs sold by the Windfarms in 2025 [redacted] The average price of the RECs [redacted]

Another section of Tab (ix) shows the total number of RECs generated by the Wind Farms, how many of those were held by RMP to comply with environmental laws in California, Oregon, and Washington, and how many are remaining. The total number of RECs reported matches the total generation in MWh reported on Tab (iii) Energy Benefits, but the remaining number does not deduct the RECs sold on the market because these were all from prior years.

The final section of Tab (ix) shows the revenue from REC sales by windfarm and Utah's allocation of that revenue. Utah's share of REC revenue is calculated in the Renewable Energy Credits Balancing Account.[26] The allocation method used to calculate Utah's share of REC revenue in this docket is the same as the Company proposed in Docket No. 26-035-11.

The 2025 Wind Report also includes a tab called Factors that lists the Utah SG allocation factor for each year from 2020 to 2025 to help explain the Utah allocations present

[25] DPU Exhibit No. 2 – RMP Response to DPU DR 36.4 – Operations and Maintenance.
[26] *Rocky Mountain Power's Application for Authority to Revise Tariff Schedule 98, Renewable Energy Credits Balancing Account,* Docket No. 26-035-11.

Redacted

elsewhere in the 2025 Wind Report. The Utah SG factors match those used in the Result of Operations reports for each corresponding year.

Conclusion

This report represents a sample of the Company's total wind generation, approximately 32% of Company owned nameplate capacity and 18% of combined Company owned and PPA wind capacity.[27] It doesn't necessarily reflect the performance of all PacifiCorp's wind plants.

The 2025 Wind Report complies with the Commission's requirements and is in the same format as past annual reports in this docket. The Division found no errors or omissions in the 2025 Wind Report and recommends that the Commission acknowledge the 2025 Wind Report.

Cc: Service List
Jana Saba and Max Backlund, Rocky Mountain Power
Michele Beck, Office of Consumer Services

[27] PacifiCorp's 2025 Integrated Resource Plan, Volume 1, p. 117 – 118, (last visited July 13, 2026) https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2025-irp/2025_IRP_Vol_1.pdf