ROCKY MOUNTAIN POWER
A DIVISION OF PACIFICORP

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August 11, 2026

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 Secretary

RE: **Docket No. 17-035-40—Application for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of a Resource Decision, *New Wind and Transmission Report for CY 2025***
Rocky Mountain Power's Reply Comments

On May 22, 2026, PacifiCorp, d.b.a. Rocky Mountain Power ("the Company"), submitted its New Wind and Transmission Report for Calendar Year 2025 to the Public Service Commission of Utah ("Commission"). On July 27, 2026, the Division of Public Utilities ("Division") filed comments which included a recommendation that the Commission acknowledge the Company's report.[1] The Company submits these reply comments to address the comments from the Division.

Response to Division's Comments
The Company appreciates the Division's review of the filing. The Division concludes that the 2025 New Wind and Transmission Report complies with the Commission's reporting requirements, is consistent with prior annual reports filed in this docket and contains no errors or omissions. The Division recommends that the Commission acknowledge the report.

The Company also appreciates the Division's discussion of certain trends reflected in the report. As noted by the Division, the wind projects continued to provide significant generation benefits during 2025, while integration costs declined from 2024 levels. The report further demonstrates continued realization of production tax credit benefits and increasing revenue associated with renewable energy credit ("REC") sales. The Division noted that REC sales volumes and average REC prices increased materially during 2025, which may provide additional opportunities to offset customer costs.

Wind Performance
The Division claims that the wind projects have produced less energy than originally projected and that five years of data suggest performance is relatively stable and unlikely to reach the original projected levels

[1] Public Service Commission of Utah, Docket No. 17-035-40, Application for Approval of a Significant Energy Resource Decision and Voluntary Request for Approval of a Resource Decision, Comments from the Division of Public Utilities, filed May 22, 2026. ("Division's Comments").

The Company has addressed this concern in previous annual reports and the Capacity Factor ("CF") projections developed for the purposes of Commission approval to proceed with the acquisition and construction of these wind projects reflect the output expected from the resources over a long time period and under conditions in which they are operating independently from other system resources. Operation of these wind projects within a broader system of generation resources impose different operating restrictions in which broader system costs are optimized in a grid that has evolved significantly since the pre-construction forecasts were performed in 2018, which considered the wind projects operating in isolation from the system. Optimizing generation resources across the grid results in curtailments being a significant cause of variances of 2024 CFs from pre-construction forecasts.

Transmission Facilities
The Division notes that the transmission costs reported on Tab (iv) is detailed information for the broader PACE balancing area rather than only the specific transmission projects approved in the docket. The Division states that while this is useful information, it does not provide information specific to the transmission facilities at issue in this proceeding. The DPU does not suggest changes since the information provided follows the Company's approved template, and questions if the Company could provide the information for these projects individually.

The Company cannot reasonably provide transmission revenue by individual project as suggested by the Division. Wholesale transmission service is provided, and revenues are derived from the integrated transmission system, making it difficult to attribute revenues to specific facilities or projects. The Company has historically reported system-level transmission revenues consistent with its understanding of the Commission's reporting requirements and the practical limitations of available data.

Conclusion
The Company agrees that the report satisfies the reporting requirements established by the Commission's prior orders in this docket and respectfully requests that the Commission acknowledge the 2025 New Wind and Transmission Report.

Informal inquiries on this matter may be directed to Max Backlund at
max.backlund@pacificorp.com.

Sincerely,

Jana Saba

Jana Saba
Director, Regulation and Regulatory Operations

Enclosures

CC: Service List

CERTIFICATE OF SERVICE

Docket No. 17-035-40

I hereby certify that on August 11, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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