

April 3, 2023

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. 23-035-06 – PacifiCorp’s Semi-annual Hedging Report**
Rocky Mountain Power’s Reply Comments

In accordance with the Notice of Filing and Comment Period issued by the Public Service Commission of Utah (“Commission”) on February 17, 2023, PacifiCorp d. b. a. Rocky Mountain Power (“the Company”) submits its reply comments in response to the comments filed on March 16, 2023 by the Division of Public Utilities (“Division”).

Background

As part of a general rate case in Docket No. 10-035-124, a collaborative process was initiated to discuss the Company’s hedging policies and develop reporting requirements for an ongoing semi-annual hedging report to the Commission. The Company has since filed the semi-annual hedging reports for six month periods ending June and December of each year as required. The DPU is tasked with reviewing PacifiCorp’s semi-annual hedging reports for compliance and providing recommendations to the Commission. On February 15, 2022, the Company filed its hedging report for the period ending December 31, 2021 that reflected changes to the hedging practices. The changes were fully described in PacifiCorp’s confidential technical conference presentation, which was held on March 29, 2022. At the request of the Division, informal discussions have been held on several occasions as described in the Company’s reply comments in the previously filed semi-annual hedging report.¹ In addition, the Company and the Division have met twice to discuss the information that was provided in the most recently filed semi-annual hedging report.

Response to Division’s Comments

In comments, the Division notes that the Commission has not been asked to approve or acknowledge the hedging report but states that the changes to the Company’s hedging report continue to impede the Division’s ability to evaluate the performance of the Company’s hedging program. The Division reports that it and the Company have been working towards identifying enhancements to the report that will help the Division to conduct a meaningful review. The Company remains committed to continued discussions on the hedging practices to facilitate the Division’s understanding and comfort with the new policies and reporting practices. The Division’s comments also raises various concerns to which the Company is committed to addressing through the ongoing collaborative discussions.

¹ Docket No. 22-035-06, Rocky Mountain Power’s Reply Comments, November 29, 2022.

Public Service Commission of Utah

April 3, 2023

Page 2

Conclusion

The Company will continue to work with the Division and other interested parties to facilitate understanding and sharing of information that will help the Division conduct a thorough and meaningful review of the Company's semi-annual hedging reports.

Informal inquiries on this matter may be directed to Jana Saba at (801) 220-2823.

Sincerely,



Joelle Steward

Senior Vice President, Regulation and Customer & Community Solutions

Enclosures

CC: Service List

CERTIFICATE OF SERVICE

Docket No. 23-035-06

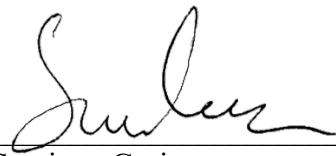
I hereby certify that on April 3, 2023, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov
ocs@utah.gov

Division of Public Utilities

dpudatarequest@utah.gov



Santiago Gutierrez
Coordinator, Regulatory Operations