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January 24, 2024

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Administrator

**Re: Docket No. 24-035-04  
Notice of Intent to File General Rate Case and Request for Approval of a Test  
Period**

Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”), pursuant to the Public Service Commission Administrative Procedures Act Rule, R746-700-1.B., hereby submits this notice to the Public Service Commission of Utah (“Commission”) of its intent to file a general rate case on or about April 30, 2024.

Pursuant to R746-700-10.B.1., Rocky Mountain Power respectfully requests that the Commission approve the test period the Company intends to use in its next general rate case, which is twelve months ending December 31, 2025, using a 13-month average rate base (“2025 Proposed Test Period”). Consistent with R746-700-10.B.1, the Company also files an application and testimony of Ms. Shelley McCoy, providing information in support of the 2025 Proposed Test Period.

In Docket No. 22-035-03, the Commission approved the Company’s request for a waiver of significant energy resource decisions for five resources pursuant to Utah Code Ann. § 54-17-501 and Utah Admin. Code R746-430-4. The Commission’s order approving the waiver requires the Company to file information substantially similar to the requirements for major plant additions under Utah Admin. Code R746-700-30 (“MPA Equivalent Information”) 30 days in advance of its application of a general rate case to evaluate prudence of the projects subject to the waiver. The Company anticipates costs for one or more of the projects included in the waiver may be included in general rate case. Therefore, the Company will file MPA Equivalent Information for any project included in the general rate case at least 30 days in advance as required.

Informal inquiries may be directed to Jana Saba at (801) 220-2823 or me at (503) 813-5161.

Sincerely,

A handwritten signature in black ink, appearing to read "Ajay Kumar", written over a horizontal line.

Ajay Kumar  
Assistant General Counsel

cc: Service List Docket No. 20-035-04

## CERTIFICATE OF SERVICE

Docket No. 24-035-04

I hereby certify that on January 24, 2024, a true and correct copy of the foregoing was served by electronic mail to the following service list for docket 20-035-04:

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*Attorneys for Rocky Mountain Power*

**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

<p>In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations.</p>	<p>Docket No. 24-035-04</p> <p><b>ROCKY MOUNTAIN POWER’S NOTICE OF INTENT TO FILE A GENERAL RATE CASE AND REQUEST FOR APPROVAL OF TEST PERIOD</b></p>
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**I. INTRODUCTION**

Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”), pursuant to the Public Service Commission Administrative Procedures Act Rule, R746-700-1.B., hereby submits this notice to the Public Service Commission of Utah (“Commission”) of its intent to file a general rate case on or about April 30, 2024. In addition, pursuant to R746-1-301 and R746-700-10.B.1., Rocky Mountain Power respectfully requests that the Commission approve the test period the Company intends to use in its next general rate case, which is twelve months ending December 31, 2025, using a 13-month average rate base (“2025 Proposed Test Period”). Consistent with R746-700-10.B.1, the Company also submits the

testimony of Ms. Shelley E. McCoy providing information supporting the 2025 Proposed Test Period.

## II. THE APPLICANT

In support of this request, Rocky Mountain Power states as follows:

1. The Company is an electrical corporation and public utility in the state of Utah. It provides electric service to retail customers in the state of Utah and is subject to the jurisdiction of the Commission with regard to its public utility operations. The Company also provides retail electric service in the states of Idaho and Wyoming under the name Rocky Mountain Power, and in the states of Oregon, Washington and California under the name Pacific Power.

2. The Company serves approximately one million customers and has approximately 2,400 employees in Utah.

3. The Company requests that all notices, correspondence and pleadings with respect to this Request be sent to:

Jana Saba  
Utah Regulatory Affairs Manager  
Rocky Mountain Power  
1407 West North Temple, Suite 330  
Salt Lake City, Utah 84116  
[jana.saba@pacificcorp.com](mailto:jana.saba@pacificcorp.com)

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[ajay.kumar@pacificcorp.com](mailto:ajay.kumar@pacificcorp.com)

In addition, Rocky Mountain Power requests that all data requests regarding this Application be sent in Microsoft Word or plain text format to the following:

By email (preferred): [datarequest@pacificorp.com](mailto:datarequest@pacificorp.com)

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

Informal questions may be directed to Jana Saba, Utah Regulatory Affairs Manager at (801) 220-2823.

### **III. EARLY DETERMINATION OF TEST PERIOD**

The Company seeks approval of the test period before filing the general rate case application, which will include a proposed revenue requirement and rates. If the test period is not determined before the Company's filing, R746-700-10.A.2 requires the Company to file an alternative test period, which in this case would be the 12 months ending June 30, 2024, in addition to a historical test period. Requiring the Company to prepare and the parties to review and audit all potential test periods increases the resources necessary to review the case and complicates the process. Determination of the test period early and separately from the other aspects of the application will allow the Company, Commission and intervening parties the ability to focus their resources more efficiently on the relevant issues.

The Company is also required to file information 30 days in advance of the application on five resources that were included in the Company request for waiver of significant energy resource decision.<sup>1</sup> One or more of the projects included in the Company's waiver request could be included in the case depending on which test period is selected. A prior test period determination is required so the Company can identify which projects are included in the test period and provide the necessary information at least 30 days in advance of the anticipated April 30, 2024, application.

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<sup>1</sup> *Application of Rocky Mountain Power for Waiver of the Requirement for Preapproval of Significant Energy Resource Acquisitions*, Docket No. 22-035-03, Order Approving Waiver and Protective Order at 4-5 (Feb. 11, 2022).

Therefore, the Company respectfully requests the Commission issue an order by March 11, 2024, approving the test period in advance of the April 30, 2024, filing.

#### **IV. TEST PERIOD REQUEST**

Utah Code Ann. § 54-4-4(3)(a) states that in determining just and reasonable rates, the Commission “shall select a test period that, on the basis of evidence, the commission finds best reflects the conditions that a public utility will encounter during the period when the rates determined by the commission will be in effect.” In its October 20, 2004 Order in Docket No. 04-035-42, the Commission identified the following factors for consideration in test period selection, including:

- the general level of inflation;
- changes in the utility’s investment, revenues, or expenses;
- changes in utility services;
- availability and accuracy of data to the parties;
- ability to synchronize the utility’s investment, revenues, and expenses;
- whether the utility is in a cost increasing or cost declining status;
- incentives to efficient management and operation; and
- the length of time the new rates are expected to be in effect.<sup>2</sup>

The Company’s general rate case filing on or around April 30, 2024, will request a rate--effective date on or around January 1, 2025. The 2025 Proposed Test Period most closely reflects the conditions the Company expects to experience during the rate-effective period and rates will be better aligned with the Company’s expected cost of service. The Company selected the future test period in this case in consideration of the current regulatory environment, state statutes governing test period development and the business factors identified above by the Commission. The 2025 Proposed Test Period is explained and supported in the direct testimony of Ms. McCoy, Director of Revenue Requirement.

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<sup>2</sup> *In the Matter of the Application of PacifiCorp for Approval of Its Proposed Electric Service Schedules and Electric Service Regulations*, Docket No. 04-035-42, Order Approving Test Period Stipulation (Oct. 20, 2004).

Utah Code Ann. § 54-4-4, requires that rates be just and reasonable. To be just and reasonable for both customers and utilities, rates must accurately reflect prudent costs expected to be incurred by a utility during the period when rates are in effect. Current economic conditions, the ability for the Company to obtain timely recovery of the costs related to increased investment in generation and transmission resources, rising insurance expenses, and rising net power costs, among other things, support the use of the 2025 Proposed Test Period. Under these circumstances, if the 2025 Proposed Test Period is not approved, the rates in effect for the rate-effective period will not be aligned with the Company's expected costs of service which would deprive the Company of a fair opportunity to recover its costs.

Utah Code Ann. § 54-4-4(3)(a) allows the use of a forward-looking test period, which may include data forecast up to 20 months ahead of the filing date of a rate case. In the 2020 general rate case, Docket No. 20-035-04 ("2020 GRC"), the Commission authorized the same type of forecast test period requested in this case, for the twelve months ending December 31, 2021.<sup>3</sup> In the 2011 general rate case, Docket No. 10-035-124 ("2011 GRC"), the Commission authorized the Company's use of a 17-month forecast test period, i.e., twelve months ended June 30, 2012, on the basis that the statutory rate case processing schedule and the rates to be implemented as part of the 2011 GRC could potentially be in effect during the latter half of 2012.<sup>4</sup> The rates to be approved as part of this 2024 general rate case may be in effect not only during 2025 but after (although their full duration at this time is uncertain). In reviewing a previous Commission determination on test period, the Utah Supreme Court stated that "in future proceedings, the Commission will decide

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<sup>3</sup> *Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations*, Docket No. 20-035-04, Order Approving Test Period at 4 (Mar. 6, 2020).

<sup>4</sup> *In the Matter of the Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations*, Docket No. 10-035-124, Order on Test Period at 8-9 (Mar. 30, 2011).



issues concerning test year based on the then existing conditions of the utility and the economy in which it is operating.”<sup>5</sup> Current economic conditions, the costs related to increased investment in transmission and generation, increased insurance costs, and rising net power costs, among other things, and the likelihood that rates that will be approved in the next general rate case will be in effect not only during the first year of the rate-effective period but beyond support the use of the 2025 Proposed Test Period in order for rates to be just and reasonable for both customers and the Company.

The Company respectfully requests that the Commission approve the 2025 Proposed Test Period in this case, which is 12 months ending December 31, 2025, with a 13-month average rate base. The Company proposes that the Commission hear evidence in support of this request and set a procedural schedule that allows for an order to be issued by March 11, 2024.

RESPECTFULLY SUBMITTED this 24th day of January, 2024.



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<sup>5</sup> See *Mountain Fuel Supply Company v. Public Service Commission of Utah*, 861 P.2d 414 (Utah 1993).