

March 27, 2024

VIA ELECTRONIC FILING

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

Attention: Gary Widerburg
Commission Administrator

Re: Docket 24-035-04
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
Filing Requirements for Waiver of Significant Energy Resource Decision Projects

Rocky Mountain Power, a division of PacifiCorp (“Rocky Mountain Power” or “Company”), pursuant to the Public Service Commission of Utah (“Commission”) order in Docket No. 22-035-03, hereby submits information substantially similar to the requirements for major plant additions under Utah Admin. Code R746-700-30 (“MPA Equivalent Information”) in advance of its Application for a general rate case, which is anticipated to be filed on or about April 30, 2024.

Background

On January 24, 2022, Rocky Mountain Power filed an Application for Waiver pursuant to Utah Code Ann. § 54-17-501 and Utah Admin. Code R746-430-4 asking the Commission to waive the requirement that the Company obtain preapproval of five projects requiring a significant energy resource decision (i) Boswell Springs; (ii) Cedar Springs IV; (iii) Dominguez I; (iv) Green River I & II; and (v) Rock Creek II. On February 11, 2022, the Commission issued an order granting the waiver subject to the following specific conditions (“Waiver Order”):

1. Rocky Mountain Power must file a notice within 14 days of finalizing the contract for each resource.¹
2. Rocky Mountain Power must file MPA Equivalent Information at least 30 days prior to filing the GRC.

¹ The required notices were filed in Docket No. 22-035-03 on May 3, 2022 (Cedar Springs IV), August 23, 2022 (Boswell Springs), October 17, 2022 (Green River I & II), and March 27, 2023 (Rock Creek II). The contract for Dominguez I has not been finalized as of the date of this letter.

Requirements Pertaining to April 30, 2024, General Rate Case Application

Bowell Springs, Cedar Springs IV and Rock Creek II projects are expected to achieve commercial operation during the approved 2025 test period² and will be included in the Company's application and rate request that is filed on or about April 30, 2024. Therefore, the Company submits MPA Equivalent Information for these three projects. Green River I & II and Dominguez I projects are expected to achieve commercial operation after the 2025 test period and will not be included in this GRC. MPA Equivalent Information for these two projects will be provided in a relevant future proceeding in accordance with the Waiver Order.

The Company hereby submits MPA Equivalent Information for Bowell Springs purchase power agreement ("PPA"), Cedar Springs IV PPA and Rock Creek II build-transfer agreement, enclosed as confidential and non-confidential electronic copies of the filing requirements under Commission Rule R746-700-30, which are referred to throughout the filing as Significant Energy Resource Filing Requirements ("SER FR"). Attachment 1 included with this filing lists each filing requirement identified in the rules and the location of the responsive information.

Confidential and highly confidential information has been uploaded to the Commission's SFTP site and will be separately provided to parties who have intervened in this proceeding and filed an Appendix A. Confidential information is provided subject to Commission Rules 746-1-602 and 746-1-603.

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

Sincerely,



Joelle Steward

Senior Vice President, Regulation and Customer/Community Solutions

cc: Service List Docket No. 24-035-04

² The PSC held a hearing to consider the Company's proposed Test Year and subsequently approved it in an order issued March 11, 2024.

R746 Public Service Commission				
Sub-Section R746-700-30 Information for Projects from SER Waiver				
Rocky Mountain Power - Docket 24-035-04				
		Boswell Springs Wind PPA (320 MW)	Cedar Springs Wind IV PPA (350.4 MW)	Rock Creek II Owned Asset (400 MW)
Rule	Description	Location in Filing	Location in Filing	Location in Filing
A.	General Information Requirements			
1	All documents and presentations that were provided to management, senior management and the Board of Directors of the utility and its affiliates related to the plant addition.	Please refer to SER FR A.1 and Confidential Attachment SER FR A.1-1	Please refer to SER FR A.1 and Confidential Attachment SER FR A.1-2	Please refer to SER FR A.1 and Confidential Attachments SER FR A.1-3a and SER FR A.1-3b
2	Copies of all Board of Directors' minutes of the utility and its affiliates where the plant was discussed, approved, reviewed, evaluated, or presented.	Please refer to SER FR A.2	Please refer to SER FR A.2	Please refer to SER FR A.2
3	Details of the plant being acquired including its location, capacity, technologies used, project milestones or progress dates, projected in-service date and demonstrating that the plant addition is a major plant addition under 54-17-13.4.	Please refer to Confidential SER FR A.3	Please refer to Confidential SER FR A.3	Please refer to Confidential SER FR A.3
4	Description of any changes, modifications, etc. to the existing utility plant/system that may be necessary to integrate the plant addition with the utility's system.	Please refer to SER FR A.4 and Confidential Attachment SER FR A.4-1	Please refer to SER FR A.4 and Confidential Attachment SER FR A.4-2	Please refer to SER FR A.4 and Confidential Attachments SER FR A.4-3a through SER FR A.4-3f
5	Information establishing the prudence of the plant addition, information addressing the provisions of 54-17-13.4, and the provisions of 54-17-302 and 54-17-303.	Please refer to Confidential SER FR A.5 and Confidential Attachments SER FR A.5-1a and SER FR A.5-1b and Confidential and Highly Confidential Supporting Workpapers SER FR A.5-1	Please refer to Confidential SER FR A.5 and Confidential Attachments SER FR A.5-1a and SER FR A.5-1b and Confidential and Highly Confidential Supporting Workpapers SER FR A.5-1	Please refer to Confidential SER FR A.5 and Confidential Attachments SER FR A.5-1a, SER FR A.5-1b, SER FR A.5-2a, SER FR A.5-2b and Confidential and Highly Confidential Supporting Workpapers SER FR A.5-1
6	Information establishing the consistency of the plant addition to projected plant acquisitions in the utility's latest Integrated Resource Plan and its Action Plan. Show that the plant addition resource is as favorable or more favorable than the compared Integrated Resource Plan resource items in terms of least cost and least risk or explain why it need not.	Please refer to SER FR A.6	Please refer to SER FR A.6	Please refer to SER FR A.6
7	Any and all documents and analyses that address the plant addition's projected costs, savings and benefits and demonstrate how and when the utility's ratepayers will see a net benefit from the plant addition and quantify the net benefit.	Please refer to SER FR A.7	Please refer to SER FR A.7	Please refer to SER FR A.7
8	Where applicable, information on whether and how the plant addition has been or will be inspected as part of due diligence, including identification of who conducted or will conduct the inspection and copies of all reports or other documents prepared by the inspectors.	Please refer to SER FR A.8	Please refer to SER FR A.8	Please refer to SER FR A.8 and Confidential Attachments SER FR A.8-1 through A.8-7
9	A list of all outside consultants or advisors used, or expected to be used by the utility in connection with the plant addition and all reports, including interim reports, prepared by outside consultants or advisors.	Please refer to Confidential SER FR A.9 and Confidential Attachment SER FR A.9-1	Please refer to Confidential SER FR A.9 and Confidential Attachment SER FR A.9-1	Please refer to Confidential SER FR A.9 and Confidential Attachment SER FR A.9-2
10	All internal reports that were prepared when analyzing the purchase or construction of the plant addition.	Please refer to SER FR A.10	Please refer to SER FR A.10	Please refer to SER FR A.10
11	Where applicable, copies of contracts that are expected to be assumed following close of acquisition.	Please refer to SER FR A.11 and Confidential Attachment SER FR A.11-1a and Confidential Attachment SER FR A.11-1b	Please refer to SER FR A.11 and Confidential Attachments SER FR A.11-2a through h	Please refer to SER FR A.11 and Confidential Attachments SER FR A.11-3a through j
12	Where applicable, copies of all contracts between the utility and the seller or operator of the plant addition.	Please refer to SER FR A.12	Please refer to SER FR A.12	Please refer to SER FR A.12
13	Where applicable, a history of the plant addition to be acquired including financial and performance characteristics for the past five years, or from the start of commercial operation, whichever is less.	Please refer to SER FR A.13	Please refer to SER FR A.13	Please refer to SER FR A.13
14	Where applicable, information on the utility's understanding of the reasons why the seller is selling the facility.	Please refer to SER FR A.14	Please refer to SER FR A.14	Please refer to SER FR A.14
15	Where applicable, information on the seller's book value of the plant.	Please refer to SER FR A.15	Please refer to SER FR A.15	Please refer to SER FR A.15
16	An indication whether the seller will allow interested persons who have signed a confidentiality agreement with the utility access to the seller's books and records for audit, and what restrictions may apply to such access.	Please refer to SER FR A.16	Please refer to SER FR A.16	Please refer to SER FR A.16

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B.	Financial and Revenue information			
1	Provide information of the revenues, costs and benefits arising from the plant addition, identifying any limits and conditions on forecast information/calculations.	Please refer to SER FR B.1	Please refer to SER FR B.1	Please refer to SER FR B.1
2	Information on the net revenue impact of bringing the plant online and operating the plant within the utility's system compared to operations without the plant.	Please refer to SER FR B.2	Please refer to SER FR B.2	Please refer to SER FR B.2
3	Justification for any acquisition premium the utility plans to include in rates and recover from ratepayers.	Please refer to SER FR B.3	Please refer to SER FR B.3	Please refer to SER FR B.3
C.	Capital cost, rate base and jurisdictional allocation information.			
1	Information on how the utility plans to finance the construction or acquisition of the plant addition. This is to include the timing and amount of any equity, debt, or other security issuances and any documents to, or received from, any investment bankers or other entities regarding the issuance of any securities connected with the plant addition.	Please refer to SER FR C.1 and Attachment SER FR C.1	Please refer to SER FR C.1 and Attachment SER FR C.1	Please refer to SER FR C.1 and Attachment SER FR C.1
2	Information indicating whether the utility has discussed the plant addition with any rating agencies and provide any reports or rating agencies provided with respect to the plant addition. If not, indicate when it plans to discuss the plant addition with any rating agency.	Please refer to SER FR C.2 and Confidential Attachment SER FR C.2	Please refer to SER FR C.2 and Confidential Attachment SER FR C.2	Please refer to SER FR C.2 and Confidential Attachment SER FR C.2
3	Information on how much of the purchase price or construction costs the utility intends to place into rate base.	Please refer to Confidential SER FR C.3	Please refer to Confidential SER FR C.3	Please refer to Confidential SER FR C.3
4	Information showing the amount and relating to any analysis of AFUDC associated with the plant addition.	Please refer to Confidential SER FR C.4	Please refer to Confidential SER FR C.4	Please refer to Confidential SER FR C.4
5	Information on the utility's anticipated jurisdictional allocation for the plant addition and any change in allocation factors and other plant, revenue and expense/cost allocations arising from the plant addition.	Please refer to SER FR C.5	Please refer to SER FR C.5	Please refer to SER FR C.5
D.	Cost and Operating Expenses Information			
1	A complete analysis of all costs associated with constructing, acquiring and operating the plant for which the utility will seek recovery from Utah ratepayers and identify any costs for which no recovery will be sought from Utah ratepayers	Please refer to SER FR D.1	Please refer to SER FR D.1	Please refer to SER FR D.1 and Confidential Attachment SER FR D.1
2	Information on all clearances, permits or other government regulatory authorizations necessary, to be modified and completed for the plant and their associated costs.	Please refer to SER FR D.2	Please refer to SER FR D.2	Please refer to SER FR D.2 and Confidential Attachment SER FR D.2
3	Information on any liquidated damages clause and early termination fees, penalties, or other expenses which may be incurred if the plant is not completed or acquired.	Please refer to SER FR D.3	Please refer to SER FR D.3	Please refer to SER FR D.3
4	Information on whether there are any integration costs or fees (transmission, pipeline, etc.).	Please refer to SER FR D.4 and Confidential Attachments SER FR D.4-1a through e	Please refer to SER FR D.4 and Confidential Attachments SER FR D.4-2	Please refer to SER FR D.4 and Confidential Attachments SER FR D.4-3a through e
5	Information on any costs analysis analyzing bringing the plant online.	Please refer to SER FR D.5	Please refer to SER FR D.5	Please refer to SER FR D.5
6	Information on how the plant addition will change and the amount of change on the utility's Operation and Maintenance costs.	Please refer to SER FR D.6	Please refer to SER FR D.6	Please refer to SER FR D.6
7	All operating cost analyses that have been completed related to the plant addition.	Please refer to SER FR D.7	Please refer to SER FR D.7	Please refer to SER FR D.7
8	The planned accounting treatment for the plant, including the proposed journal entries or other accounting entries for such planned accounting treatment.	Please refer to SER FR D.8	Please refer to SER FR D.8	Please refer to SER FR D.8
9	A description of and the amounts for overhead, closing, contingent or any other costs for which the utility expects it will ask recovery as a result of the acquisition.	Please refer to Confidential SER FR D.9	Please refer to Confidential SER FR D.9	Please refer to Confidential SER FR D.9

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E.	Net Power Costs Information			
1	The impacts of the plant addition on any utility power cost and production cost dispatch models. If any models are revised to accommodate the plant addition, the revised models will be available to the parties participating in the application proceeding.	Please refer to SER FR E.1 and Attachments SER FR E.1_NPCReports CONF and SER FR E.1 Aurora v14.2.1057 CONF	Please refer to SER FR E.1 and Attachments SER FR E.1_NPCReports CONF and SER FR E.1 Aurora v14.2.1057 CONF	Please refer to SER FR E.1 and Attachments SER FR E.1_NPCReports CONF and SER FR E.1 Aurora v14.2.1057 CONF
2	A net power cost study (NPC) in the utility's production cost dispatch model that documents changes from previous net power cost estimates. All relevant workpapers and documentation to allow any other person to perform an independent analysis and verification of the NPC will be provided.	Please refer to SER FR E.2	Please refer to SER FR E.2	Please refer to SER FR E.2
3	Show how the plant addition impacts planned outages, unplanned outages, and maintenance at the utility's generation resources.	Please refer to SER FR E.3	Please refer to SER FR E.3	Please refer to SER FR E.3

CERTIFICATE OF SERVICE

Docket No. 24-035-04

I hereby certify that on March 27, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

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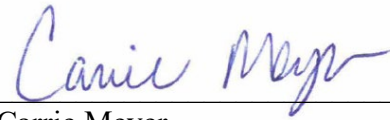
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