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Attorney for Rocky Mountain Power

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

Investigation, Regarding Open Market Operations	DOCKET NO. 24-035-10 ROCKY MOUNTAIN POWER'S REQUEST TO CLOSE TECHNICAL CONFERENCE TO THE PUBLIC
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PacifiCorp d/b/a Rocky Mountain Power (“Rocky Mountain Power” or the “Company”), requests the Public Service Commission of Utah (“Commission”) close the technical conference scheduled for April 2, 2024 (“Technical Conference”) to the public because it will be necessary for the Company to provide confidential information in order to adequately discuss the issues identified by the Commission.

On February 24, 2024, the Commission issued an order in Rocky Mountain Power’s 2023 Energy Balancing Account Proceeding, stating that the Commission “intends to notice a technical conference, in a separate docket, during which the Company will present information about making trades under unusual market conditions and explain what additional information it could provide to justify the trades later in a regulatory proceeding.”¹ On March 1, 2024, the Commission issued a Notice of Docket and Technical Conference and requested the Company “offer a presentation at the beginning of the technical conference to educate attendees about the

¹ *Rocky Mountain Power’s Application for Approval of the 2023 Energy Balancing Account*, Docket No. 23-025-01, Order at 19-20 (Feb. 23, 2024).

procedures and practices it employs when entering physical power transactions and that the Company be prepared to discuss what options exist to document its reasoning underlying specific transactions, particularly in cases involving fixed-price contracts at unusually high prices.”² This notice additionally identified that if “the Company believes it will be necessary to discuss confidential information to adequately discuss the subject, the PSC asks the Company to file a request with the PSC to close the technical conference to the public on or before Friday, March 15, 2024, explaining the reason that closing the technical conference is appropriate and in the public interest.”³

Rocky Mountain Power requests that the Commission close the Technical Conference to ensure the Company’s presentation is able to provide the information requested by the Commission. In order to provide that information, the discussion will involve sharing strategies and decision-making information that is considered confidential and competitively sensitive and could harm Rocky Mountain Power’s customers if publicly exposed. Any discussion of the Company’s “procedures and practices” that are employed when engaging in market transactions would require discussion of the Company’s strategies for engaging in market transactions and hedging activities. This is information that the Company considers confidential and if discussed or revealed to other market participants, it would place Rocky Mountain Power at a competitive disadvantage when engaging in market transactions. This competitive disadvantage could result in those market participants taking advantage of the Company’s publicly revealed power purchasing strategies to extract maximum value from the Company’s market position and result in higher priced market transactions for the Company.

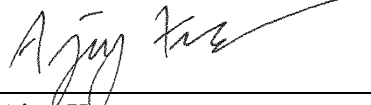
² Notice of Docket and Technical Conference at 1-2 (Mar. 1, 2024).

³ *Id.*

These higher priced market transactions would harm Rocky Mountain Power's customers, because the costs of providing this power are recovered through the Company's rates. As a result, it is appropriate and in the public interest to ensure this competitively sensitive information remains confidential and that the Technical Conference be closed to the public.

Respectfully Submitted this 14th day of March 2024,

ROCKY MOUNTAIN POWER



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CERTIFICATE OF SERVICE

Docket No. 24-035-10

I hereby certify that on March 14, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

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Utah Association of Energy Users

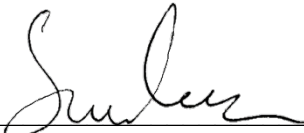
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