

March 5, 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 Administrator

Re: **Docket No. 25-R318-01** – Proposed Rulemaking Concerning Utah Code §§ 54-26-101 to -901, Large-Scale Electric Service Requirements
Docket No. 24-035-43 – Division of Public Utilities Request for an Investigatory Docket Regarding Rocky Mountain Power’s Line Extension Policy for Large Loads
Rocky Mountain Power Initial Comments re: Suggested Scope and Principles of Potential Large Load Flexible Tariff

Pursuant to the Scheduling Order, Notice of Virtual Technical Conference, and Notice of Virtual Scheduling Conference, issued on February 12, 2026 by the Public Service Commission of Utah (“Commission”), Rocky Mountain Power (“Company”) hereby submits for filing its initial comments regarding the suggested scope and the principles of potential large load flexible tariff.

The Company looks forward to reviewing and responding to proposals made by stakeholders on the principles of a potential large load flexible tariff. The Company does not have additional comments at this time.

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

Sincerely,



Jana Saba
Director, Regulation and Regulatory Affairs

CERTIFICATE OF SERVICE

Docket No. 25-R318-01

I hereby certify that on March 5, 2026, 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

Cameron Irmas cirmas@utah.gov

Division of Public Utilities

dpudatarequest@utah.gov

Assistant Attorney General

Patricia Schmid pschmid@agutah.gov

Robert Moore rmoore@agutah.gov

Patrick Grecu pgrecu@agutah.gov

Calpine Energy Solutions LLC

Gregory M. Adams greg@richardsonadams.com

Greg Bass greg.bass@calpinesolutions.com

Utah Association of Energy Users

Phillip J. Russell prussell@jdrslaw.com

Interwest Energy Alliance

Hunter Holman hunter@interwest.org

Chris Leger chris@interwest.org

Enyo Renewable Energy, LLC

Sommer J. Moser sommer@pepplemoser.com

Christine Mikell christine@enyo-energy.com

Jacob Simmons jacob@enyo-energy.com

NRG Energy and Tract

Chad Baker ccbaker@hollandhart.com

Thorvald A. Nelson tnelson@hollandhart.com

Abigail C. Briggerman acbriggerman@hollandhart.com

Cem Turhal cem.turhal@nrg.com

Dennis Bartlett dennis.bartlett@tract.com

Orijit Ghoshal orijit.ghoshal@tract.com

Enchanted Rock

Scott D. Lipton

slipton@enchantedrock.com

Rocky Mountain Power

Data Request Response
Center

datarequest@pacificorp.com

Jana Saba

jana.saba@pacificorp.com

utahdockets@pacificorp.com

Max Backlund

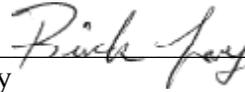
max.backlund@pacificorp.com

Ajay Kumar

Ajay.kumar@pacificorp.com

Katherine Smith

Katherine.smith@pacificorp.com



Rick Loy

Coordinator, Regulatory Operations

CERTIFICATE OF SERVICE

Docket No. 24-035-43

I hereby certify that on March 5, 2026, 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
Alyson Anderson akanderson@utah.gov
Bela Vastag bvastag@utah.gov
Alex Ware aware@utah.gov
Jacob Zachary jzachary@utah.gov

Assistant Attorney General

Patricia Schmid pschmid@agutah.gov
Robert Moore rmoore@agutah.gov
Patrick Grecu pgrecu@agutah.gov
Madison Galt mgalt@agutah.gov

Rocky Mountain Power

Data Request Response Center datarequest@pacificorp.com
Jana Saba jana.saba@pacificorp.com
utahdockets@pacificorp.com
Max Backlund max.backlund@pacificorp.com
Katherine Smith katherine.smith@pacificorp.com

Stadion LLC

Irion A. Sanger irion@sanger-law.com
F. Diego Rivas diego@sanger-law.com
Kyle Moore kyletmoore@meta.com
Kyra Coyle kcoyle@newgenstrategies.net

Tract Capitol Management

Dennis Bartlett dennis.bartlett@tract.com
Allison Girvin legal@tract.com

James Dodge Russel & Stephens PC

Phillip J. Russell

prussell@jdrslaw.com

Attorneys

Michael Green

michael.green@edged.us

Jennifer Reinhardt-Tessmer

jtessmer@kmclaw.com

Energy Strategies LLC

Justin Bieber

jbieber@energystrat.com

Davison Van Cleve PC

Sommer Moser

sjm@dvclaw.com

Nannette Moller

nmm@dvclaw.com

Western Resource Advocates

Sophie Hayes

sophie.hayes@westernresources.org

Karl Boothman

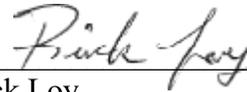
karl.boothman@westernresources.org

Nancy Kelly

nancy.kelly@westernresources.org

Jessica Loeloff

jessica.loeloff@westernresources.org



Rick Loy

Coordinator, Regulatory Operations