

April 26, 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-T04 - Rocky Mountain Power's Notice and Request for Extension of Deadline Related to Electric Service Schedule No. 37, Avoided Cost Purchases from Qualifying Facilities**

In its February 12, 2009, Order in Docket No. 08-035-78 on Net Metering Service, the Public Service Commission of Utah ("Commission") directed PacifiCorp, dba Rocky Mountain Power, ("Company") to calculate and file Electric Service Schedule No. 37 ("Schedule 37") avoided costs annually in order to establish the value or credit for net excess generation of large commercial customers under Schedule 135 Net Metering Service. In its November 28, 2012, Order in Docket No. 12-035-T10, the Commission directed that future annual filings should be made within 30 days of filing the Company's Integrated Resource Plan ("IRP") or IRP Update, or by April 30 of each year, whichever occurs first. The Company filed its 2023 IRP Update on April 1, 2024.

The Company's March 26, 2024, filing in docket 23-035-28 included a non-routine change to the avoided cost methodology, switching from the GRID model to PLEXOS. The Company has been diligently working to incorporate the preferred portfolio from the 2023 IRP Update in the calculation of avoided costs using the PLEXOS model, but has not yet completed these calculations. PLEXOS is used to produce IRPs and IRP Updates with a focus on portfolio selection and reliability. Adapting the 2023 IRP Update PLEXOS results for the determination of avoided costs has taken more time than expected, in part because the Company has limited experience with this transition. The Company also does not have avoided cost results using the GRID model that incorporate the 2023 IRP Update, and these would require significantly more time and effort to prepare.

At this time, the best available avoided cost prices are those based on PLEXOS as reported in the Company's March 26, 2024, filing in docket 23-035-28, which included the preferred portfolio from the Company's 2023 IRP, which was finalized on May 1, 2023. The 2023 IRP preferred portfolio included significant near-term resource additions to assist with expected compliance requirements under the Environmental Protection Agency's Ozone Transport Rule ("OTR"). The

Utah Public Service Commission

April 26, 2024

Page 2

2023 IRP Update preferred portfolio did not assume OTR compliance requirements<sup>1</sup> and has fewer near-term renewable resource additions, which is likely to impact avoided costs.

Given the extenuating circumstances, the Company respectfully requests that the Commission extend the deadline for this year's annual update filing to Schedule 37 from April 30, to May 15, so that it can reflect the best available information based on the 2023 IRP Update. Alternatively, the Company is willing to file tariff sheets that reflect the avoided cost pricing from its March 26, 2024, filing in docket 23-035-28 as directed by the Commission.

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

Sincerely,



Joelle Steward

Senior Vice President, Regulation/Customer & Community Solutions

cc: Service List

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<sup>1</sup> A discussion of the status of the OTR was included in the Company's 2023 IRP Update, see pages 22-24. Available online at: [https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023\\_IRP\\_Update.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2023_IRP_Update.pdf)

**CERTIFICATE OF SERVICE**

Docket No. 24-035-T04

I hereby certify that on April 26, 2024, a true and correct copy of the foregoing was served by electronic mail to the following:

**Utah Office of Consumer Services**

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[ocs@utah.gov](mailto:ocs@utah.gov)

**Division of Public Utilities**

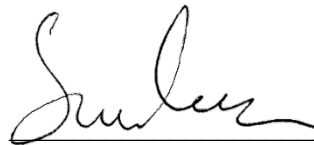
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Santiago Gutierrez  
Coordinator, Regulatory Operations