

Agency Exhibit 4.1

**RMP's Response to CREA Data Request
1.5.'1.7. cpf '408'Referenced in the
Testimony of Kevin C. Higgins**

CREA Data Request 1.5

Resource Valuation. Please refer to Mr. MacNeil's direct testimony, lines 30-40. Does Mr. MacNeil agree that prior to selecting a shortlist of six prospective Schedule 100 resources for PacifiCorp to value, the Agency should have the opportunity to review in detail the valuation mechanics that the Company intends to use? If Mr. MacNeil disagrees, please explain.

Response to CREA Data Request 1.5

PacifiCorp disagrees that the Community Renewable Energy Agency (CREA) should have the opportunity to review all aspects of the valuation mechanics prior to that analysis being conducted.

PacifiCorp agrees that the CREA may be able to select resources with relatively greater benefits by considering the potential outcome of the valuation, in addition to the costs associated with a bid. PacifiCorp is prepared to provide information related to Schedule 38 avoided cost pricing based on its analysis prepared for its Avoided Cost Input Changes Quarterly Compliance Filing, most recently filed in Docket No. 25-035-30. PacifiCorp is also prepared to provide information from its 2025 Integrated Resource Plan (IRP), filed in Docket No. 25-035-22, which included price-policy scenarios, stochastic risk assessment, and variant and sensitivity analysis.

PacifiCorp has not yet performed analysis to identify the extent that pricing results based on Schedule 38 should be adjusted for renewable energy credit (REC) value and any price-policy, risk, or other modifications it believes are appropriate to ensure the Schedule 100 resource value does not shift any costs or benefits to non-participating customers. Any such analysis will reflect the best information available at the time the analysis is prepared and methodologies appropriate to the information and circumstances and thus are not pre-determined.

CREA Data Request 1.7

Schedule 100 rates. Please refer to Mr. MacNeil's direct testimony, lines 30-40, Mr. Meredith's direct testimony, lines 32-39, and Mr. Eller's direct testimony, lines 305-312. Hypothetically, putting aside any administrative costs, if the avoided cost benefit from a Schedule 100 resource were to exceed the cost of acquiring the Schedule 100 resource, would the Company's proposal result in a net credit to Schedule 100 customers? That is, under the Company's proposal, is it possible for Schedule 100 to be a net credit instead of an incremental charge? If not, please explain why not.

Response to CREA Data Request 1.7

No. Providing a benefit to participants of the Utah Community Clean Energy Program would mean collecting the avoided cost benefit from a Schedule 100 resource that were to exceed the cost of acquiring the Schedule 100 resource ("hypothetical benefit") identified from other non-participating customers to pay participating Utah Community Clean Energy Program customers. The Company interprets that having non-participating customers pay for a "hypothetical benefit" violates the requirement that non-participating customers not be impacted by any cost or benefit shifts to any non-participating customers as per the approved House Bill (HB) 411 legislation.

CREA Data Request 2.1

Resource Valuation/Schedule 100 rates. Please refer to Mr. MacNeil's direct testimony, lines 387-397, Mr. Eller's direct testimony, lines 305-312, and Mr. Meredith's work paper, "Annual Schedule 100 Updates Example 6-4-25."

- (a) Notwithstanding the fact that Schedule 100 rates are subject to annual adjustments, does the Company anticipate that the underlying net cost of the Schedule 100 Resource (i.e., cost minus benefits, corresponding to "REC Premium 1" in Mr. Meredith's work paper) will be determined at the outset of the project based on the valuation method discussed in Mr. MacNeil's testimony? If not, please explain.
- (b) Does the Company anticipate that the underlying net cost of the Schedule 100 Resource (corresponding to "REC Premium 1" in Mr. Meredith's work paper) will be calculated on a levelized basis for incorporation into Schedule 100? If not, please explain.
- (c) Alternatively, does the Company anticipate that the underlying net cost of the Schedule 100 Resource (corresponding to "REC Premium 1" in Mr. Meredith's work paper) will be calculated on a nominal basis for each year of its contract life, with each year's nominal value incorporated into Schedule 100 for the corresponding year?
- (d) Does the Company believe the approaches described in subparts (b) and (c) are equivalent from a net present value standpoint? If not, please explain.
- (e) Does the Company have a preference between the approaches described in subparts (b) and (c), or is the Company indifferent between the two? If the Company has a preference, please explain why it prefers one approach over the other.

Response to CREA Data Request 2.1

- (a) Yes.
- (b) No. PacifiCorp can provide the levelized value for informational purposes. Please refer to the Company's response to subpart (d) below.
- (c) Yes. PacifiCorp anticipates that Schedule 100 rates in each year would use the net cost for that year, as calculated at the time of contract execution and approved by the Public Service Commission of Utah (UPSC).
- (d) A levelized net cost and the stream of nominal net costs upon which it was based would be expected to result in equal net present values. However, the recovery of those net cost streams over time would be different. The

difference between the levelized net cost and the stream of nominal net costs in a given year is inherently a cost shift between participating and non-participating customers in that year, even if it is expected to cancel out over the life of the resource on a net present value (NPV) basis. Levelization frequently results in higher value at the start of a contract term relative to the nominal value in those years, which could represent additional risk related to repayment.

- (e) The approach in subpart (c) is preferred, for the reasons described in the Company's response to subpart (d) above.