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## Memorandum

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Annette Orton, Utility Analyst  
Tamra Dayley, Utility Analyst

**Date:** July 23, 2025

**Re:** **Docket No. 25-035-13**, Rocky Mountain Power's Application to Revise Rates in Tariff Schedule 98, Renewable Energy Credits Balancing Account.

## Recommendation (Approval)

Based upon the Utah Division of Public Utilities' ("DPU" or "Division") comprehensive review and audit of Rocky Mountain Power's ("RMP" or "Company") Renewable Energy Credits (RECs), the Division recommends that the Public Service Commission of Utah ("PSC" or "Commission") approve the interim rates set under this docket as final.

## Issue

The Division hereby submits for filing the Division's 2024 Audit Report of the Rocky Mountain Power, Renewable Energy Credits Balancing Account (RBA).

## Discussion

On May 30, 2025, the Commission issued its Order approving RMP's proposed RBA on an interim basis pending the Division's audit report, with an effective date of June 1, 2025.

The Division reviewed numerous documents during its audit, including direct testimony, RMP's initial and supplemental responses to Data Requests, RMP's REC sales, request for



proposals, RMP's reverse request for proposals, RMP's REC revenue contracts, renewable costs in base rates, the REC budget for 2024 and 2025, REC policies and procedures, and previous RBA filings. The Division also reviewed and verified that the fees billed by the Company to Kennecott comply with the confidential Non-Generation and REC Supply Agreement between Kennecott Utah Copper LLC and PacifiCorp, dated April 8, 2019. Based on this review, it appears the RBA is prudently managed and follows regulatory and reporting requirements.

The numbers reflect the accurate revenue from the REC sales and the proper allocation of resources, which further supports the Division's recommendation for the interim rates to be made final.

## **Conclusion**

Based on a review of the associated 2024 REC tariff, Schedule 98, and related 2024 filings with the Public Service Commission of Utah, Rocky Mountain Power appears to be prudently managing the program and complying with regulatory and reporting requirements. Therefore, the interim rates appear to be in the public interest and should be made final.

cc: Jana Saba, Rocky Mountain Power  
Max Backlund, Rocky Mountain Power  
Michele Beck, Office of Consumer Services  
Service List