



1407 W. North Temple
Salt Lake City, UT 84116

April 23, 2026

Bela Vastag
Office of Consumer Services
160 East 300 South
Salt Lake City, UT 84111
bvastag@utah.gov (C)

Alyson Anderson
akanderson@utah.gov (C)

Alex Ware
aware@utah.gov (C)

Jennifer Dean
jmdean@utah.gov (C)
ocs@utah.gov (C)

RE: UT Docket No. 25-035-22
OCS 2nd Set Data Request (1)

Please find enclosed Rocky Mountain Power's Response to OCS 2nd Set Data Request 2.1. The Highly Confidential Attachment OCS 2.1 has been provided via BOX. Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rules R746-1-601-606.

If you have any questions, please call me at (801) 220-2823.

Sincerely,

_____/s/_____
Jana Saba
Manager, Regulation

Enclosures

Madison Galt/DPU dpudatarequest@utah.gov mgalt@utah.gov (C)
Phillip J. Russell/UAE prussell@jdrslaw.com (C)
Don Hendrickson/UAE dhendrickson@energystrat.com (C)
Karl Boothman/WRA karl.boothman@westernresources.org (C)
Sophie Hayes/WRA sophie.hayes@westernresources.org (C)
Jessica Loeloff/WRA jessica.loeloff@westernresources.org (C)
Nancy Kelly/WRA nancy.kelly@westernresources.org (C)
Lauren R. Barros/UCE LRB@LaurenBarrosLaw.com (C)

Sarah Wright/UCE sarah@utahcleanenergy.org (C)
Logan Mitchell/UCE logan@utahcleanenergy.org (C)
Jenn Bodine/UCE jbodine@utahcleanenergy.org (C)
Josh Craft/UCE josh@utahcleanenergy.org (C)
Kevin Emerson/UCE kevin@utahcleanenergy.org (C)

OCS Data Request 2.1

Regarding Appendix H and Table H.1 in the Highly Confidential PacifiCorp 2025 Integrated Resource Plan Update, please provide the following:

- (a) Copies of all work papers used in creating Appendix H and Table H.1.
- (b) For each resource bid shown in Table H.1 (columns 1 to 4), additional details including the size (MW) of the generation resource, whether storage is included (include storage size and duration), the PPA term, expected commercial operation date and location (state and county).
- (c) For each resource bid shown in Table H.1 (columns 1 to 4), source of the bid (e.g. Oregon RFP, Washington RFP, URC RFP, etc) and date the bid was submitted.
- (d) For each proxy resource shown in Table H.1 (column 5), size (MW) of generation resource, whether storage is included (include storage size and duration), earliest possible commercial operation date and location (state and county).
- (e) For each row in Table H.1, please provide a short narrative explaining the reasons for the differences in \$/MWh costs between columns 4 and 5. If possible, please give a rough estimate of the impact each driver of the cost difference has on the \$/MWh difference between the two columns (e.g. ~10%, ~25%, ~50%, etc or “most of the difference”, “large impact”, “small impact”, etc).

Response to OCS Data Request 2.1

The requested information is considered highly confidential and commercially sensitive. The Company requests special handling. Highly Confidential Attachment OCS 2.1 is provided to the requesting party – the Office of Consumer Services (OCS) Only. Other interested parties should contact Max Backlund at max.backlund@pacificorp.com to make arrangements for review.

- (a) Please refer to Highly Confidential Attachment OCS 2.1 which provides data supporting Appendix H and Table H.1.
- (b) Please refer to Highly Confidential Attachment OCS 2.1. Cells H2:R14 provide details related to each resource bid shown in Table H.1.
- (c) All resource bids shown in Table H.1 are from PacifiCorp’s 2025 Washington Situs Request for Proposals (RFP). All bids and bid materials for PacifiCorp’s

2025 Washington Situs RFP were received on or before October 7, 2025.

- (d) Please refer to Highly Confidential Attachment OCS 2.1. Cells H16:R28 provide details related to each proxy resource shown in Table H.1.
- (e) For each row in Table H.1, a large portion of the difference in dollars per megawatt-hour (\$/MWh) costs between columns 4 and 5 (bid cost and 2025 Integrated Resource Plan (IRP) proxy cost) is the inclusion of production tax credits (PTC) in the 2025 IRP proxy resource cost. Without PTCs, 2025 IRP proxy resource costs are approximately double what is shown in Table H.1. While the 2025 IRP represented Inflation Reduction Act (IRA) / Infrastructure Investment and Jobs Act (IIJA) PTC and investment tax credits (ITC) for new resources, the 2025 IRP Update incorporated H.R.1 which phases out and repeals IRA/IIJA tax credits for new wind and solar resources.

Furthermore, the 2025 IRP used the National Laboratory of the Rockies (NLR) 2024 Annual Technology Baseline (ATB) as the basis for proxy resource costs. Other contributors to the difference in \$/MWh costs between columns 4 and 5 are largely due to the costs considered - or not considered - by the 2024 ATB. The 2024 ATB may omit or understate costs included in real-world resource projects including but not limited to: development risk, permitting delays, and owner's costs, inflation volatility and supply-chain stress, interconnection and network upgrade costs.

Note: bid prices received for Washington stated they were capturing PTCs, despite being priced significantly above the price of 2025 IRP proxy resources.

Highly confidential information is provided in accordance with Commission Rule R746-1-602 and 603.