

Docket No. 25-035-47

Application of Rocky Mountain Power for Approval of the  
2026 Inter-Jurisdictional Cost Allocation Protocol

Exhibit OCS 1.2D

Data Requests Referenced by Leah J. Wellborn in  
Direct Testimony on Behalf of  
The Office of Consumer Services

REDACTED

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### **UTLCOG Data Request 2.68**

Refer to the Direct Testimony of Rick T. Link, lines 78-82.

(a) Will situs assigned loads (50 MW or above) that rely on the system for generation, back up services, or other services that impact the system capacity or energy data used for the allocation factors be included in only the load data for the state where the load is located to appropriately have the costs follow the cost causation from these situs loads? Please explain your response in detail.

(b) How will states receive an appropriate level of overhead costs through the SO factor as a result of situs assigned loads? Please explain your response in detail.

### **Response to UTLCOG Data Request 2.68**

(a) The 2026 Protocol proposes to capture new large load data in the dynamic allocation factors used to allocate costs to non-Washington states. Within each of the non-Washington states, section 13.0 of the 2026 Protocol reads:

“PacifiCorp will work within the regulatory framework (i.e., a special contract or tariff) within that state to assign the costs to the New Large Load customer, as determined by that state’s commission.”

Essentially, as proposed, costs will be allocated to the state in which a new large load is located, and within that state, the Company will work within the state-specific regulatory framework to assign costs to new large load customers. Ultimately, once a cost allocation methodology is approved, state commissions will determine how costs are spread across customers within the state.

(b) The 2026 Protocol proposes calculating the System Overhead (SO) allocation factor based on one-third of each of the following components.

- System Energy
- System Capacity
- System Gross Plant Distribution

This formula takes into consideration the impacts of each state’s load data, as well as investments in distribution plant, which provides an overall encompassing basis to allocate overhead costs.

Please note, the SO calculation proposed in the 2026 Protocol is consistent with the SO allocation factor methodology as outlined in “Section 5.4 – Resolved Issues” of the 2020 Protocol.

## **DPU Data Request 8.2**

Refer to the Confidential Direct Testimony of Michael G. Wilding, p.7, Confidential Figure 1 and p. 8, Confidential Figure 2, which provide monthly resource adequacy results for the 2026 WRAP seasons.

- (a) Please provide a 10-year monthly forecast of load growth and capacity positions for each state in the five state portfolio. If a 10-year forecast is not available, please explain why and provide all years available. Provide supporting data in electronic spreadsheet format with formulas intact.
- (b) Please provide a 10-year monthly forecast of load growth and capacity positions for Washington state. If a 10-year forecast is not available, please explain why and provide all years available. Provide supporting data in electronic spreadsheet format with formulas intact.

## **Response to DPU Data Request 8.2**

Rocky Mountain Power objects to this request as outside the scope of the proceeding, request information that is not in the Company's possession or control, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objection, the Company responds as follows:

- (a) The Company has not performed the requested analysis. PacifiCorp analyzed the resource adequacy of the Five-State Portfolio using Western Resource Adequacy Program (WRAP) metrics to show that the proposed 2026 Protocol reasonably allocates resources to the states compared to the 2020 Inter-Jurisdictional Cost Allocation Methodology (2020 Protocol) for the forecasted peak loads and planning reserve margins (PRM) in 2026. The analysis is not intended to forecast the future resource adequacy of the Five-State Portfolio. As such, PacifiCorp did not perform a resource adequacy analysis for future years using the proposed 2026 Protocol resource allocations. Furthermore, providing 10-year monthly load growth and capacity positions would not change the conclusions of the Direct Testimony of Company witness, Michael G. Wilding, because the resource allocations from the 2020 Protocol and proposed 2026 Protocol use the same load forecast and qualified capacity contributions (QCC) for each resource. Therefore, the proposed 2026 Protocol would still allocate resources in a way that provides a comparable level of resource adequacy compared to the 2020 Protocol.
- (b) Please refer to the Company's response to subpart (a) above.

### **Sierra Club Data Request 1.6**

Please provide a narrative explanation for why the 2026 Protocol proposes a 100 percent allocation of the Chehalis natural gas plant to Washington. Please specify if there is any existing regulatory or statutory requirement that this full allocation is based upon.

### **Response to Sierra Club Data Request 1.6**

The Company proposes allocating 100 percent of the Chehalis plant to Washington to address resource adequacy in Washington and to align with Washington energy policy. Washington has two laws that affected PacifiCorp's decision to fully allocate Chehalis to Washington – the Clean Energy Transformation Act (CETA) and the Climate Commitment Act (CCA).

To comply with CETA, PacifiCorp must remove coal resources from rates in Washington by the end of 2025. The situs assignment of Chehalis to Washington will allow greater flexibility while PacifiCorp adjusts its Washington-allocated portfolio to comply with CETA. As CETA deadlines approach, it will be easier to modify the operation of a single emitting facility to satisfy Washington-specific energy policies.

The CCA was enacted by the State of Washington in 2021, and became effective in January 2023. The CCA attempts to reduce carbon emissions by establishing a market incentive for covered entities to reduce emissions. Specifically, the CCA requires that PacifiCorp purchase greenhouse gas (GHG) allowances associated with emissions produced by the Chehalis plant but allocates free allowances to serve Washington retail loads. Only the portion of Chehalis' output that serves PacifiCorp's customers outside of the State of Washington incurs the cost of the allowances. However, the commissions in Utah, Oregon, Idaho and Wyoming have disallowed the recovery in customers rates for costs for allowances necessary to operate the Chehalis plant for the benefit of customers in those states. Therefore, allocating Chehalis to Washington will allow the Company the opportunity to fully recover its costs to operate the plant while aligning with state policies.

**Sierra Club Data Request 1.9**

Regarding the Hermiston natural gas plant:

- (a) Please provide a narrative explanation for why the 2026 Protocol proposes a zero percent allocation to Washington. Please specify if there is any existing regulatory or statutory requirement that this allocation is based upon.
- (b) Please clarify the existing allocation of Hermiston to Washington under the 2020 Protocol/WIJAM.

**Response to Sierra Club Data Request 1.9**

- (a) Please refer to the Direct Testimony of Company witness, Rick T. Link's, lines 380-384, which explains that the Hermiston generating facility is included to balance resource capacity given the realignment of Chehalis to address resource adequacy and Washington energy policy, as discussed in response to Sierra Club Data Request 1.6.
- (b) The allocation of the Hermiston generating facility in Washington's rates under the 2020 Inter-Jurisdictional Cost Allocation Methodology (2020 Protocol) / Washington Inter-Jurisdictional Allocation Method (WIJAM) is based on the Central Area Generation West (CAGW) allocation factor. The percentage in the Company's most recent Washington general rate case (GRC), Docket UE-230172, is 22.163 percent.

### **UTLCOG Data Request 7.12**

Refer to the Company's response to UTLCOG Data Request 3.1. The response to the request, in part, states the following:

The Company is, therefore, not asking for other states to pay stranded asset costs, but rather, proposing a larger portion of generation benefits to each non-Washington state, but also in keeping with cost causation principles, that those states also pay the corresponding increased share of generation resource costs.

- (a) Please provide the cost benefit analyses that support the reassignment of each plant that demonstrate that the benefits of any reassignment outweigh the costs.
- (b) Where in the Company's filing can such cost benefit analysis be found by plant, including O&M, net power costs, capital costs and all other costs compared to the market alternatives to demonstrate each plants net benefits?

### **Response to UTLCOG Data Request 7.12**

- (a) The proposed 2026 Protocol benefits Utah customers by increasing Utah's ability to meet its resource adequacy and energy needs with a slightly higher allocation of existing Company generation resources and correspondingly aligning the cost allocation of these resources. The Company has not prepared the requested cost/benefit analyses.
- (b) Please refer to the Company's response to subpart (a) above.

### **DPU Data Request 8.3**

Please provide a 10-year forecast of expected load and planning reserve margin requirements for each state in PacifiCorp's portfolio. Provide your response in native spreadsheet format with formulas in tact. To the extent the information is available, break out the following line-terms:

- (a) Base load forecast (referring to the load forecasted from typical forecasting methodologies such as econometric, time series, or survey based analysis),
- (b) Large load growth,
- (c) Electric vehicle loads,
- (d) Other electrification loads,
- (e) Planning Reserve Margin, and
- (f) Any other line items typically separated from the base load forecast.

### **Response to DPU Data Request 8.3**

Please refer to Confidential Attachment DPU 8.3-1 which provides the expected load for each state in PacifiCorp's service territory for calendar years 2026 through 2035 (in megawatt-hours (MWh)).

- (a) The requested information is commercially sensitive and highly confidential. The Company requests special handling. Please contact Max Backlund at [max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com) to make arrangements for review of Highly Confidential Attachment DPU 8.3-2.
- (b) The requested information is commercially sensitive and highly confidential. The Company requests special handling. Please contact Max Backlund at [max.backlund@pacificorp.com](mailto:max.backlund@pacificorp.com) to make arrangements for review of Highly Confidential Attachment DPU 8.3-3.
- (c) Please refer to Attachment DPU 8.3-4 which provides PacifiCorp's electric vehicle (EV) forecast loads by state for calendar years 2026 through 2035 (in MWh).
- (d) Please refer to Attachment DPU 8.3-5 which provides PacifiCorp's building electrification forecast loads by state for calendar years 2026 through 2035 (in MWh).
- (e) For modeling purposes in PacifiCorp's 2025 Integrated Resource Plan (IRP), the Western Resource Adequacy Program (WRAP) July planning reserve

margin (PRM) of 14.4 percent was used as the planning requirement. Please refer to Attachment DPU 8.3-6 which provides the data used.

- (f) Please refer to Attachment DPU 8.3-7 which provides PacifiCorp's private generation (PG), net energy efficiency (EE) and Federal Energy Regulatory Commission (FERC) forecast loads by state for calendar years 2026 through 2035 (in MWh).

Confidential information is provided subject to Public Service Commission of Utah (UPSC) Rules R746-1-601-606.

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**Total Annual Reserve Requirement, MWh**

Year	Oregon	Washington	California	Utah	Idaho	Wyoming	Total
2026	2,399,332	649,371	119,114	4,242,166	570,125	1,374,918	9,355,025
2027	2,472,359	670,895	118,359	4,334,995	569,794	1,357,682	9,524,084
2028	2,504,039	691,698	117,877	4,431,263	569,784	1,358,987	9,673,648
2029	2,567,075	687,177	116,758	4,511,049	567,812	1,348,651	9,798,522
2030	2,599,978	685,090	116,058	4,594,224	566,510	1,347,867	9,909,727
2031	2,748,315	682,397	115,377	4,667,325	565,112	1,343,412	10,121,939
2032	3,010,748	680,452	115,047	4,756,980	564,726	1,342,104	10,470,057
2033	3,028,016	674,525	114,011	4,826,730	562,899	1,334,314	10,540,495
2034	3,033,500	670,471	113,363	4,917,390	562,221	1,329,604	10,626,548
2035	3,046,637	667,804	112,913	5,017,856	562,192	1,325,812	10,733,214

### **UTLCG Data Request 3.9**

Refer to the Direct Testimony of Rick T. Link, lines 265-268.

- (a) Explain how the 2026 Protocol will increase the future resource adequacy for Utah and identify any specific sections or statements in the protocol supporting this explanation.
- (b) Will the Company propose dynamic allocations of new generation resources (other than resources over 50 MW acquired to serve new large loads)? If yes, explain how the 2026 Protocol will provide flexibility in the allocation of these resources.
- (c) Will the 2026 Protocol allow a state to not participate in new generation and transmission resources that are primarily needed for other states, or will all new generation and transmission be dynamically allocated until the conclusion of Phase 2? Please explain.

### **Response to UTLCG Data Request 3.9**

- (a) Please refer to the Direct Testimony of Company witness, Michael G. Wilding, starting on page 8, which shows an analysis PacifiCorp performed on the resource adequacy of the Utah system under the 2020 Inter-jurisdictional Cost Allocation Methodology (2020 Protocol) and the proposed 2026 Protocol. In short, the analysis shows that the resource adequacy for Utah's share of the Five-State Portfolio (California, Idaho, Oregon, Utah and Wyoming), is similar between the 2020 Protocol and the 2026 Protocol.
- (b) Per Section 3.6 of the 2026 Protocol, PacifiCorp will propose an allocation factor for each new generation resource. The 2026 Protocol is flexible in that it allows either fixed or dynamic factors, and is not tied to an existing methodology.
- (c) As described in part b, PacifiCorp will provide a resource-specific allocation proposal for each new generation resource. The 2026 Protocol allows for resources to be situs-assigned, so new resources do not need to be dynamically allocated through the conclusion of Phase 2.

**DPU Data Request 8.13**

Refer to Direct Testimony of Rick T. Link at p 25, lines 491-497, regarding situs assignment of costs and revenues related to a state greenhouse gas pricing program in the 2026 Protocol. If Chehalis were to be allocated as a “Subset 1” resource, allocated across all 6 states, confirm that all Washington Climate Commitment Act costs (e.g. the \$54.9 million forecasted for 2026) would be situs assigned to Washington under the 2026 Protocol. If not confirmed, explain how any exception is consistent with the section of Mr. Link’s testimony cited above and section 3.7 of the proposed 2026 Protocol.

**Response to DPU Data Request 8.13**

The Company is not proposing to allocate Chehalis across all six states. In a hypothetical scenario where any generation from Chehalis is allocated to a non-Washington jurisdiction, there will likely be costs incurred under the Climate Commitment Act (CCA). PacifiCorp will also likely be unable to recover those costs in Washington rates for any portion of generation not allocated to Washington. The Company should not be placed in a position where legally imposed costs for running Chehalis are unrecoverable.

**DPU Data Request 9.6**

Direct Testimony of Ramon Mitchell, p 5, lines 92-103 describes “Step 3: Calculating the Net Position” as one of five steps in proposed NPC allocation.

- (a) Why is the Net Position calculated for the Five-State Portfolio, but not for individual states?
- (b) If certain states are long and others short in net position (within the Five-State Portfolio), would it be reasonable to adjust the NPC allocation using net position in the same way as proposed for the Five-State Portfolio? Why or why not?

**Response to DPU Data Request 9.6**

- (a) Positions are at the portfolio level and, in Phase 1, the proposed 2026 Protocol contemplates two portfolios (the Washington Portfolio and the Five-State Portfolio).
- (b) Under the limited scope of Phase 1, it would not be reasonable to have two portfolios *and* six portfolios simultaneously.

### **DPU Data Request 6.3**

Refer to Confidential Direct Testimony of Michael G. Wilding, please provide and answer the following requests:

- (a) Please provide the numerical data for Confidential Figure 1 and 2 for each state including Washington. Please note for each state, any month for which resource adequacy is short and whether the change in protocol improved upon this position.
- (b) How does the Company intend to fully cover the peak loads plus PRM in each month for each state?
- (c) What role will participation in EDAM play in Utah's ability to meet resource adequacy? Provide Details and any model results that support.
- (d) Please refer the statement on page 16, lines 292-295,

“However, in the future, EDAM settlements will enable the Company to track NPC per unique generation portfolios. For example, Utah would be allocated the fuel costs, purchased power costs, and wholesale sale revenues associated with its generation portfolio.”

Please answer the following:

- (i) Confirm if it is the Company's intention to have static generation portfolios for all states in the future?
  - (ii) Would the static generation portfolio be utilized to allocate EDAM costs?
  - (iii) Would the static generation portfolio apply to NPC and revenue requirement allocations for the assigned resources? If not, please provide rationale.
- (e) Currently, does Washington experience replacement energy NPC based on its fixed portfolio, i.e. if Chehalis has an unplanned forced outage, is Washington exposed to additional market purchased and increased NPC costs, due to that outage?
  - (f) Please provide the workbook Exhibit RMP\_(MWG-1) complete with all Excel formulas intact. Provide any related workbooks that support, establish, and explain the inputs used in Exhibit RMP\_(MWG-1).

### **Response to DPU Data Request 6.3**

- (a) Please refer to the Company’s response to DPU Data Request 6.1, specifically Confidential Attachment DPU 6.1, which provides a corrected version of confidential file “25-035-47 RMP PROPRIETARY\_MGW Direct Testimony Individual State WRAP View” and which includes the data used to create Confidential Figure 1 and Confidential Figure 2 for all the states (including Washington) in the Direct Testimony of Company witness, Michael G. Wilding. The data in the file can be used to see how resource adequacy changes from the 2020 Inter-Jurisdictional Cost Allocation Methodology (2020 Protocol) to the proposed 2026 Protocol for each state. In general, the resource adequacy of each of the states in the Five State Portfolio (California, Idaho, Oregon, Utah and Wyoming) is very similar in the proposed 2026 Protocol compared to the 2020 Protocol. For states in the Five State Portfolio, the 2026 Protocol does not cause any states to become resource inadequate for months that the state was adequate under the 2020 Protocol. Washington does generally see a more noticeable decrease in assigned resource capacity, which affects the resource adequacy of the state, in the 2026 Protocol compared to the 2020 Protocol. The reason for this is largely due to Washington law that mandates utilities to remove coal from electricity rates.
- (b) Please refer to Michael Wilding’s Direct Testimony, lines 135 and 136, which states “... the Company, as a system, generally has an open position that it fills using near-term transactions such as market purchases”.
- (c) PacifiCorp’s participation in the extended day-ahead market (EDAM) does not factor into Utah’s resource adequacy as the EDAM facilitates efficient scheduling of resources one day before the operating day. Resource adequacy is evaluated months or years in advance of the operating day. This is why near-term market purchases, which will happen in the EDAM, are not considered in the analysis provided in Michael Wilding’s Direct Testimony.
- (d) Please refer to the Company’s responses to subparts (i) through (iii) below:
- (i) PacifiCorp has not yet established its proposal for Phase 2 of the proposed 2026 Protocol.
  - (ii) PacifiCorp has not yet established its proposal for Phase 2 of the proposed 2026 Protocol.
  - (iii) PacifiCorp has not yet established its proposal for Phase 2 of the proposed 2026 Protocol.
- (e) The Company interprets “currently” to refer to the existing Washington Inter-Jurisdictional Allocation Method (WIJAM). Based on the foregoing interpretation, the Company responds as follows:

Washington net power costs (NPC) is determined by comparing Washington load to the generation and market transactions that are allocated to Washington. If Washington is short, under WIJAM, the shortfall is valued using the average price of system balancing purchases and sales (imputed for rebalancing). Any increase or decrease in NPC depends on whether this imputed cost is less than or exceeds the cost of the shortfall generation.

- (f) The Company assumes that the reference to “Exhibit RMP\_(MWG-1)” is intended to be a reference to Confidential Exhibit RMP\_(MGW-1) (State Capacity and Energy Positions Comparison of the 2020 Protocol and 2026 Protocol). Based on the foregoing assumption and reference correction, the Company responds as follows:

For the figures on resource adequacy, please refer to the Company’s response to DPU Data Request 6.1, specifically Confidential Attachment DPU 6.1 which provides a corrected version of confidential file “25-035-47 RMP PROPRIETARY\_MGW Direct Testimony Individual State WRAP View”.

For the figures that show the energy comparisons, please refer to the confidential work papers supporting Michael Wilding’s Direct Testimony, specifically confidential file “25-035-47 RMP PROPRIETARY\_MGW Direct Testimony Five-State Portfolio and Individual State Energy View”.

### **UTLCOG Data Request 3.36**

Refer to the Direct Testimony of Ramon J. Mitchell, lines 280-282.

- (a) Please explain how the Company’s proposal to wait for the implementation of Phase 2 to begin using the Extended Day Ahead Market (EDAM) (anticipated to go live on May 2026) to track net power costs (NPC) and benefits is consistent with its statement that “the allocation of costs and benefits between the states would be more reflective of actual market activity and resource usage”.
- (b) How will the non-Washington states in which PacifiCorp provides retail electric service be protected from Washington’s usage of free capacity from generation resources not allocated to Washington under the 2026 Washington Protocol assuming NPC actual market activity and resource usage is not determined through the EDAM for approximately five more years?

### **Response to UTLCOG Data Request 3.36**

- (a) As stated in the Direct Testimony of Company witness, Ramon J. Mitchell, lines 280-282, the Extended Day Ahead Market (EDAM) will not begin until May 1, 2026, therefore, the Company will not have sufficient operational experience to integrate EDAM actual market activity until after Phase 1 of the proposed 2026 Protocol.
- (b) In the proposed 2026 Protocol, net power costs (NPC) are intended to represent actual market activity. Furthermore, the Utah Large Customer Group’s (UTLCOG) assertion that Washington will be using “free capacity” is misaligned with how PacifiCorp operates its system. PacifiCorp does not use resources or participate in markets to meet the loads of states individually. PacifiCorp operates its resource portfolio and participates in markets to meet the needs of its system holistically. The proposed 2026 Protocol only proposes a change in the method for allocating resource costs, not how PacifiCorp will be operating its resource portfolio to meet system load, reserve, or resource adequacy needs across its system.

### **UTLCG Data Request 2.69**

Refer to the Direct Testimony of Rick T. Link, lines 119-122.

- a) Since the 2020 Protocol anticipated moving to fixed allocation factors after the Interim Period, why is the Company not proposing fixed allocation factors for all states in this case consistent with the Company's proposal in Washington? Please explain your response in detail.
- b) Is the Company proposing an additional four years of dynamic allocation generation resources before Phase 2 is implemented and Oregon has exited coal? Please explain your response in detail.
- c) How much time does the Company need to complete analysis on fixing resource factors for all states? Please explain your response in detail.

### **Response to UTLCG Data Request 2.69**

Rocky Mountain Power objects to this request to the extent that it requests information that is not in the Company's possession or control and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving any objection, the Company responds as follows:

- (a) Please refer to the Company's response to UTLCG Data Request 2.67 sub-part (a).
- (b) The Company is proposing the 2026 Protocol until such time that a new proposal is developed in phase 2. The Company will present a phase 2 filing to state regulatory commissions to be effective no later than 2030.
- (c) Please refer to the Company's response to UTLCG Data Request 2.67 and the response to subpart (b) above. The Company will propose a methodology in the Phase 2 filing which will be supported by appropriate analysis and evidence.

### **UTLCOG Data Request 2.67**

Refer to the Direct Testimony of Rick T. Link, lines 62-75.

- (a) Considering all of the proposed changes between now and 2030, why doesn't the Company's proposal fix all generation portfolios consistent with the approach the Company proposes in Washington?
- (b) Doesn't the Company's approach create the possibility of a new allocation shortfall or windfall by having certain Washington generation fixed based on a four-year average while Washington's capacity and energy loads are lower in 2025? Explain your answer in detail.
- (c) Will the Company's proposal always keep the higher fixed level for Washington share of shared resources and subtract this level from the development of allocation factors for the other five states in which PacifiCorp provides retail electric service, so the total Company result is always equal to 100% (excluding FERC)?

### **Response to UTLCOG Data Request 2.67**

- (a) Fixed allocation factors are primarily beneficial when planning to meet state energy policies that require removal of certain resources from rates and that are affected by changes in proportional load forecasts among the six states. For states with these policies, use of dynamic allocation factors adds an incremental variable that could contribute to non-compliance.

Washington energy policy requires removal of coal from rates at the end of 2025 and use of non-emitting energy to meet its retail load. Consequently, PacifiCorp proposed fixed allocation factors for Washington in the Washington 2026 Protocol.

Oregon energy policy requires removal of coal from rates by 2030 and requires that emissions associated with retail load achieve specific emission-reduction targets starting in 2030. It is likely that PacifiCorp will propose fixed allocation factors for Oregon in phase 2. PacifiCorp has not yet determined whether it will propose fixed allocation factors for Utah in phase 2.

- (b) No. Please refer to Section 3.1 of the proposed 2026 Protocol. Washington's fixed allocation factor for existing resources is either zero percent, 7.90 percent, 34.87 percent or 100 percent, depending upon the specific resource. For all existing resources, except for those allocated to Washington on a situs basis, the percent not allocated to Washington is allocated to the other five states. Consequently, the allocation of all existing resources will always sum

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to 100 percent.

(c) Please refer to the Company's response to sub-part (b) above.