

Division Exhibit 2.2

Company Response to Data Requests in the Testimony of Timothy Lenell

DPU Data Request 8.2

Refer to the Confidential Direct Testimony of Michael G. Wildling, 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. Wildling, 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.

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UTLCG Data Request 2.42

UTLCG Data Request 2.42

Please confirm that the Company's 2026 Washington Protocol fixes generation factors for Washington based on a four-year average for all non-emitting and natural gas resources assigned to Washington. If confirmed, which four years are included in the average? If not confirmed, please describe in detail the basis for the fixed allocation factors applied to generation in the Company's 2026 Washington Protocol.

Response to UTLCG Data Request 2.42

Confirmed. The Fixed System Generation (SGF) allocation factor is proposed for the allocation of non-emitting (except Rolling Hills) and the Jim Bridger Units 1 and 2 natural gas resources assigned to Washington. The SGF allocation factor is based on a four-year average of system generation (SG) allocation factors calculated in accordance with 2020 Inter-Jurisdictional Cost Allocation Methodology (2020 Protocol) for years 2020 through 2023.

UTLCOG Data Request 3.26

Refer to the Direct Testimony of Rick T. Link, lines 507-512.

- (a) Does the Company's proposal exclude Washington from paying any decommissioning costs for Jim Bridger 3 and 4 and Colstrip 4 since Washington has exited these plants prior to 2030? If not, please explain in detail how the Company proposes that Washington pay decommissioning costs.
- (b) What state(s) is(are) responsible for "any remaining rate base and associated expense, including decommissioning costs" related to Washington's stranded generation from coal closures or exclusion of east-side thermal resources from Washington rates?
- (c) If the Utah Commission denies the reassignment of Washington stranded generation, who will pay for it? Does the Company commit to separately track those costs to ensure they don't impact Utah customers?

Response to UTLCOG Data Request 3.26

- (a) No, it does not. Presently, to the extent that any state is currently allocated generation benefits from any resource, that state, including Washington, pays for depreciation expense in customers' retail rates, which includes some level of estimated decommissioning and remediation costs. Washington customers have been paying for depreciation expense at an accelerated rate based on their shorter depreciable lives for Jim Bridger Units 3 and 4 and Colstrip 4. Additionally, Washington customers have been paying for additional, incremental decommissioning and remediation costs through a separate charge that is accruing in a regulatory liability account since calendar year 2021. This charge is currently anticipated to continue through 2030. All these collected amounts will be applied in the true-up of decommissioning and remediation costs, once those amounts are known when the decommissioning and remediation work is completed. Currently, under the Washington Inter-Jurisdictional Allocation Method (WIJAM), Washington agrees to pay their allocated share of final decommissioning costs.
- (b) There are not any stranded generation costs or rate base due to Washington's historical allocation methodologies. Costs associated with Washington's share of coal-fire facilities not paid for by Washington have historically been absorbed by PacifiCorp's shareholders. The Company's proposed 2026 Protocol proposes a prospective reassignment of generation resources, based on the net plant values starting January 1, 2026.
- (c) The Company's proposed 2026 Protocol does not reflect any reassignment of Washington stranded generation. Historically, even though Washington has

not paid for east-side thermal resources through customer rates, the Company has recorded depreciation expenses on those assets assuming a system depreciation rate. The depreciation expense is recorded but the Company would have received no revenues to cover that expense. Accordingly, PacifiCorp shareholders would have absorbed the portion of the costs that no state was paying for. The prospective reassignment that the Company is proposing through the implementation of the proposed 2026 Protocol is seeking to redistribute to the other states going forward the net plant balance on this basis wherein the other states will benefit from the lower net plant balance due to having historically recorded depreciation expense on a system basis. With that reallocation, states will be getting an increased share of the generation benefit, with the increased share of remaining, on-going, generation costs. 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.