

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

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In the Matter of the Application of	)	
Rocky Mountain Power for Approval of	)	
a Waiver of the Requirement for	)	Docket No. 25-035-55
Solicitation Process and of a Significant	)	
Energy Resource Decision and Report	)	
of Sale	)	
	)	

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DIRECT TESTIMONY OF  
CAMERON IRMAS

FOR THE  
OFFICE OF CONSUMER SERVICES

January 23, 2026

REDACTED VERSION

1 **Q. WHAT IS YOUR NAME, BUSINESS ADDRESS AND OCCUPATION?**

2 A. My name is Cameron Irmias. My business address is 160 East 300 South  
3 Salt Lake City, Utah 84111. I am a Utility Analyst for the Utah Office of  
4 Consumer Services (“OCS”).

5 **Q. PLEASE DESCRIBE YOUR QUALIFICATIONS FOR PROVIDING**  
6 **TESTIMONY IN THIS PROCEEDING?**

7 A. I have a Bachelor of Science in Economics from the University of California,  
8 Berkeley, and a Master of Science in Mechanical Engineering from Oregon  
9 State University. I have a background in energy systems modeling, and  
10 prior to joining OCS, I worked as a Research Engineer at the National  
11 Renewable Energy Laboratory for two years. I joined OCS in 2025, attended  
12 the Wisconsin Public Utility Institute’s week-long Energy Utility training  
13 program, and have since contributed to OCS filings in multiple dockets,  
14 most recently the Large Load Rulemaking proceedings (Docket No. 25-  
15 R318-01).

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. I will address Rocky Mountain Power’s (“RMP”) application in this  
18 proceeding for the Public Service Commission of Utah (“PSC”) to approve:

19 a) A request to grant a waiver from the Solicitation Process in Part 2 of  
20 the Energy Resource Procurement Act (“ERPA”), under Utah Code  
21 § 54-17-501.

22 b) A request for a “significant energy resource decision” (“SERD”) to  
23 enter into a Power Purchase Agreement (“PPA”) with US SFR Owner

24                   LLC, for nuclear energy from the Natrium commercial demonstration  
25                   plant, via the Kemmerer Unit 1 (“KU1”) project, under Utah Code §  
26                   54-17-302.

27                   I will discuss the factors considered in our analysis and provide the OCS’s  
28                   recommendations on whether RMP’s requests should be approved.

29   **Q.   WHAT INFORMATION DID YOU USE IN YOUR REVIEW OF RMP’S**  
30   **APPLICATION?**

31   A.   I reviewed RMP’s filed materials, including the Application, PPA, Direct  
32   Testimony of Rick T. Link, Workpapers 1-4, and Exhibits RTL 1-3. I attended  
33   the January 13, 2026, technical conference, where RMP described the KU1  
34   project, the PPA structure, and the economic analysis results. I reviewed  
35   the Department of Energy’s (“DOE”) Advanced Reactor Demonstration  
36   Program (“ARDP”) Funding Opportunity Announcement (“FOA”),<sup>1</sup> as this  
37   program is cited in these materials as a key driver for the waiver request. I  
38   also reviewed the KU1 construction permit application with the Nuclear  
39   Regulatory Commission. I contributed to data requests submitted by the  
40   OCS and reviewed data requests submitted by the Division of Public Utilities  
41   (“DPU”). Finally, I reviewed [REDACTED]

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<sup>1</sup> U.S. Department of Energy. (2020). *DE-FOA-0002271: Advanced Reactor Demonstration*.

<https://www.energy.gov/ne/advanced-reactor-demonstration-program>

42 [REDACTED]

43 [REDACTED]

44 **Request for Waiver of the Requirement of a Solicitation Process**

45 **Q. RMP IS REQUESTING A WAIVER OF THE SOLICITATION PROCESS**  
46 **REQUIREMENT UNDER UTAH CODE § 54-17-501. DOES IT APPEAR**  
47 **THAT THE PPA FILED IN THIS DOCKET QUALIFIES FOR SUCH A**  
48 **WAIVER?**

49 **A.** Yes, it appears that the PPA may qualify for a waiver. Utah Code § 54-17-  
50 501(1) states that a waiver may be granted:

- 51
- 52 ...if the commission determines that waiving the requirement is
- 53 in the public interest because there exists:
- 54 (a) a clear emergency;
- 55 (b) a time-limited commercial or technical opportunity
- 56 that provides value to the customers of the affected electrical
- 57 utility; or
- 58 (c) any other factor that makes waiving the requirement
- 59 in the public interest.
- 60

61 In its application, RMP states that the PPA meets the requirements for a  
62 waiver, primarily because: "...it involves a time-limited, economic  
63 opportunity for an innovative commercial structure that allows PacifiCorp to  
64 support ARDP objectives [REDACTED]

[REDACTED]

65 [REDACTED]; the deadline for federal funding and  
66 TerraPower's need for certainty to obtain such funding meet the standard  
67 for time-sensitive".<sup>3</sup>

68 **Q. DO YOU AGREE WITH ALL OF RMP'S JUSTIFICATIONS FOR THE**  
69 **NEED OF A WAIVER FOR THIS PPA?**

70 A. Not necessarily. The KU1 project is expected to be online nearly 6 years  
71 from now, and it is unclear how time-limited the PPA is due to the ARDP  
72 requirements. The program specifies that Advanced Reactor  
73 Demonstrations must be operational in 5-7 years, with the possibility of  
74 extensions, but the precise milestones for this project are not provided. The  
75 OCS requested additional information on these time-limiting requirements  
76 in data request OCS 1.8, but the ARDP time limits are still not clear. RMP's  
77 response to OCS 1.8 is included with my testimony as Exhibit 1.1D.

78 **Q. DESPITE NOT CLEARLY KNOWING THE ARDP REQUIREMENTS,**  
79 **DOES THE OCS BELIEVE THAT THE PPA CAN STILL QUALIFY FOR A**  
80 **WAIVER OF THE SOLICITATION REQUIREMENT?**

81 A. Yes. I believe it qualifies under the waiver provision of the procurement  
82 code because the PPA allows the Company to lock-in first rights to  
83 participate in a novel "technical opportunity", a sodium-cooled fast reactor  
84 coupled with a molten salt integrated energy storage system. In addition,

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<sup>3</sup> RMP Application, page 7.

85 as I will discuss later in this testimony, it appears that the PPA also provides  
86 risk protection for ratepayers.

87 **Q. DO YOU RECOMMEND THAT THE PSC GRANT RMP'S REQUEST FOR**  
88 **A WAIVER OF THE SOLICITATION PROCESS REQUIREMENT FOR**  
89 **THIS PPA?**

90 A. Yes, the OCS recommends that the PSC grant the waiver in this instance,  
91 as allowed under § 54-17-501(1).

92 **Request for Approval of a Significant Energy Resource Decision**

93 **Q. RMP IS REQUESTING APPROVAL OF A SIGNIFICANT ENERGY**  
94 **RESOURCE DECISION UNDER UTAH CODE § 54-17-302. DOES THE**  
95 **KU1 PROJECT AND PPA MEET THE STATUTORY DEFINITION OF A**  
96 **SIGNIFICANT ENERGY RESOURCE?**

97 A. Yes. The PPA for electricity from the KU1 project has a term of 40 years,  
98 and the nuclear portion of the project is rated at 345 MW, with the integrated  
99 energy storage system enabling flexible operation from 100 to 500MW for  
100 up to 5.5 hours. Section 54-17-102 of the Utah ERPA defines a significant  
101 energy resource as one that consists of: "a purchase of the following if the  
102 contract is for a term of 10 or more years and not less than 100 megawatts:  
103 (i) electricity; (ii) electric generating capacity; or (iii) electricity and electrical  
104 generating capacity." The KU1 PPA clearly meets this definition.

105 **Q. WHAT CRITERIA DOES THE ERPA REQUIRE FOR PSC APPROVAL OF**  
106 **A SIGNIFICANT ENERGY RESOURCE DECISION?**

107 A. Section 54-17-302 of the code for the approval of a SERD is rather lengthy;  
108 therefore, I will not quote the entire section here. However, in summary, the  
109 code states that for approval, the PSC should determine if the SERD is in  
110 the public interest, considering, among other factors: dispatchability, state  
111 resource needs, state energy policy, risk, reliability, and whether it will most  
112 likely result in the acquisition, production, and delivery of electricity at the  
113 lowest reasonable cost to RMP's retail customers. In addition, this section  
114 of the code states that the PSC may consider other factors determined to  
115 be relevant.

116 **Q. DID YOUR ANALYSIS SHOW THAT KU1 MEETS ALL APPLICABLE**  
117 **REQUIREMENTS?**

118 A. In general, yes. The Application and PPA appear to comply with PSC rules  
119 and, as I described earlier in my testimony, to meet the requirements for a  
120 waiver of the solicitation process. I will address the remaining requirement,  
121 which is that the request is in the public interest, taking into consideration  
122 the previously mentioned factors.

123 **Q. PLEASE DESCRIBE THE EXTENT TO WHICH KU1 PROVIDES**  
124 **DISPATCHABLE POWER.**

125 A. The KU1 project achieves dispatchable power by decoupling the Nuclear  
126 Island, which contains the reactor and its supporting systems, from the  
127 Energy Island, which contains the molten salt storage, steam turbine,

128 generator equipment, and other Balance of Plant systems.<sup>4</sup> While modern  
129 nuclear reactors—sodium fast reactors included—are capable of load  
130 following by ramping power output up and down, this is generally not  
131 operationally desirable or economic. The molten salt storage solution allows  
132 for a more optimal technoeconomic outcome, where the reactor can run  
133 continuously as baseload, while the Energy Island can ramp its output to  
134 meet variable demand. During low demand, the reactor runs at full power,  
135 but the Energy Island spins down the turbines, and heat is transferred to the  
136 molten salt storage. Conversely, during high demand, the reactor continues  
137 at baseload, but the storage is simultaneously discharged to produce  
138 power.<sup>5</sup> [REDACTED]

139 [REDACTED]  
140 [REDACTED]  
141 [REDACTED]

142 **Q. DID YOUR ANALYSIS SHOW THAT KU1 MEETS THE REASONABLE**  
143 **COST STANDARD?**

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<sup>4</sup> U.S. Nuclear Regulatory Commission. (2022). *Energy Island Decoupling Strategy*.  
<https://www.nrc.gov/docs/ML2203/ML22035A331.pdf>

<sup>5</sup> Id.

<sup>6</sup> Rocky Mountain Power’s Presentation for the January 13, 2026 Closed Technical  
Conference [CONFIDENTIAL], pg. 29.

144 A. Yes. The PPA contains provisions which address reasonable cost and price  
145 protections for ratepayers. Cost is addressed in Exhibit K, Section II:

146 [REDACTED]  
147 [REDACTED]  
148 [REDACTED]  
149 [REDACTED]  
150 [REDACTED]  
151 [REDACTED]  
152 [REDACTED]  
153 [REDACTED]

154 [REDACTED]  
155 [REDACTED]  
156 [REDACTED]

157 I agree that this pricing structure will adequately protect ratepayers

158 [REDACTED]  
159 [REDACTED]  
160 [REDACTED]  
161 [REDACTED]

162 [REDACTED]. Likewise, KU1's  
163 generating capacity may displace higher-cost resources by shifting supply  
164 such that the marginal resource is one of lower cost. The provided PLEXOS  
165 model outputs specify an average cost of [REDACTED]  
166 [REDACTED] which I find to be reasonable based on recent net

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<sup>7</sup> See RMP Workpapers 1, "Summary" sheet, column F.

167 power costs evaluated in other filings, including RMP’s Application for  
168 Approval of the 2025 Energy Balancing Account.<sup>8</sup>

169 **Q. WITH THE KU1 PROJECT [REDACTED], DOES**  
170 **THE PPA SUPPORT THE REASONABLE COST STANDARD BEING**  
171 **MAINTAINED OVER TIME?**

172 A. Yes, I believe that risks to customers related to [REDACTED]  
173 are effectively mitigated. The PPA specifies that [REDACTED]  
174 [REDACTED]  
175 [REDACTED]  
176 [REDACTED]  
177 [REDACTED]  
178 [REDACTED]  
179 [REDACTED]  
180 [REDACTED]  
181 [REDACTED]  
182 [REDACTED] however, based on RMP’s response to OCS

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<sup>8</sup> Docket No. 25-035-01 Rocky Mountain Power’s Application for Approval of the 2025 Energy Balancing Account. DPU Exhibit 1 – Preliminary Review of 2025 EBA Application [CONFIDENTIAL]

<sup>9</sup> PPA Section 6.7.3

<sup>10</sup> Id, Section 6.7.4

<sup>11</sup> Id, Section 6.7.5

183 Data Request 2.2 (attached as Exhibit 1.2D), I do not expect this to pose a  
184 significant risk to customers.

185 **Q. DID YOU FIND THAT KU1 ADDRESSES THE RELIABILITY FACTOR OF**  
186 **THE SERD STATUTE?**

187 A. Yes. [REDACTED]  
188 [REDACTED] KU1 provides the potential for baseload power and  
189 flexible grid response. This flexibility is beneficial in supporting existing  
190 resources, especially intermittent generation sources such as wind and  
191 solar. The project also provides redundancy [REDACTED]  
192 [REDACTED]. Finally, customers remain protected in cases where [REDACTED]  
193 [REDACTED]  
194 [REDACTED]  
195 [REDACTED].

196 **Q. IN YOUR OPINION, DOES THE PPA ADEQUATELY ADDRESS RISKS**  
197 **FOR BOTH RATEPAYERS AND THE COMPANY?**

198 A. Yes, I described above how the PPA addresses cost risk. The PPA also  
199 mitigates risks associated with building and operating a nuclear plant  
200 [REDACTED]  
201 [REDACTED]  
202 [REDACTED]

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<sup>12</sup> Direct Testimony of Rick T. Link, lines 173-179

203 [REDACTED]

204 [REDACTED]

205 [REDACTED]

206 [REDACTED]

207 [REDACTED]

208 [REDACTED]

209 [REDACTED]

210 **Q. ARE THERE OTHER POTENTIAL BENEFITS IN USING THIS PPA**

211 **STRUCTURE?**

212 **A. Yes.** [REDACTED]

213 [REDACTED]

214 [REDACTED]

215 [REDACTED]

216 [REDACTED]

217 [REDACTED]

218 [REDACTED]

219 [REDACTED]

220 [REDACTED]

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<sup>13</sup> PPA Section 11.5

<sup>14</sup> Id, Section 11.3.5(c)

<sup>15</sup> PPA Section 6.4.2

<sup>16</sup> Id, Section 8.1

221 [REDACTED] However, [REDACTED]  
222 [REDACTED] adequate monitoring of  
223 plant performance and transparency in reporting will be crucial to ensure  
224 that such actions are in the public interest. Therefore, as part of the approval  
225 of this SERD, the OCS recommends that the PSC require the Company to  
226 report plant performance and other key metrics so the PSC and other  
227 interested parties will have sufficient information to review any such future  
228 decisions.

229 **Q. DO YOU RECOMMEND THAT THE PSC GRANT RMP'S REQUEST FOR**  
230 **APPROVAL OF A SIGNIFICANT ENERGY RESOURCE DECISION FOR**  
231 **THE KU1 PROJECT PPA?**

232 A. Yes, the OCS recommends that the PSC approve RMP's request under §  
233 54-17-302(1). The PPA structure and accompanying documentation  
234 demonstrate that this resource decision minimizes risks to ratepayers, while  
235 also attaining many of the other public interest factors under § 54-17-302(3).

236 **Summary and Recommendations**

237 **Q. WHAT IS THE OCS'S RECOMMENDATION FOR THE REQUESTS THAT**  
238 **RMP HAS MADE IN THIS FILING?**

239 A. The OCS has reviewed RMP's application and supporting information, and  
240 the KU1 Project and PPA appear to meet the requirements of  
241 ERPA. Therefore, the OCS recommends the PSC approve both of RMP's  
242 requests in this docket:

243 a) A waiver of the solicitation requirement, and

244 b) A request for a significant energy resource decision

245

246 Finally, [REDACTED] the OCS  
247 recommends that the PSC require RMP to report plant performance and  
248 other key metrics.

249 **Q. DOES THAT CONCLUDE YOUR TESTIMONY?**

250 **A. Yes.**