

25-035-55 / Rocky Mountain Power  
November 21, 2025  
OCS Data Request 1.8

### **OCS Data Request 1.8**

The Company claims the KU1 project is a “time-limited opportunity” and page 7 of Mr. Link’s testimony states: “...the timeline for this opportunity is driven by DOE ARDP funding requirements and NRC licensing schedules that cannot accommodate traditional utility procurement timelines... Approval is required to secure offtake from the KU1 project on a timeline that enables US SFR to meet DOE ARDP financial requirements and NRC financial qualifications.” Please provide documentation detailing these funding requirements, financial requirements, required financial qualifications and associated timelines that demonstrate that KU1 is a time-limited opportunity or cannot accommodate a traditional utility procurement timeline.

### **Response to OCS Data Request 1.8**

PacifiCorp objects to this data request to the extent it is vague and ambiguous. It is unclear what information and what types of information would satisfy this data request. PacifiCorp further objects to this request to the extent that it seeks information from TerraPower that is not within the Company’s possession. Subject to and without waiving the foregoing objection, PacifiCorp responds as follows:

There are a number of financial requirements for projects like the Kemmerer Power Station Unit 1 (KU1) Project, which is receiving funding from the United States Department of Energy (DOE). As an initial matter, under 10 Code of Federal Regulations (C.F.R.) § 50.33(f)(2), any applicant to the Nuclear Regulatory Commission (NRC) for funding must “submit information that demonstrates the applicant possesses or has reasonable assurance of obtaining the funds necessary to cover estimated operation costs for the period of the license” in order to obtain a license. Additionally, projects seeking funding under the Advanced Reactor Demonstration Program (ARDP) must either result in a fully functional reactor within seven years of the award or have the potential to commercialize by the mid-2030s.<sup>1</sup> Finally, as a part of the environmental review process, the DOE was required to review the need for power from the KU1 Project.<sup>2</sup> Without a clear offtake agreement in development, it is unclear that TerraPower would have been capable of providing any information to support a need for power determination as required.

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<sup>1</sup> See U.S. DEP’T OF ENERGY, Advanced Nuclear Reactor Demonstration Program, <https://www.energy.gov/ne/advanced-reactor-demonstration-program>, last accessed Nov. 18, 2025.

<sup>2</sup> See U.S. NUCLEAR REGULATORY COMMISSION, Environmental Impact Statement for the Construction Permit Application for Kemmerer Power Station Unit 1, Final Report, NUREG-2268 at 5-1, et seq (Oct. 2025).