

February 20, 2026

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administration

RE: **Docket No. 25-035-61, Request of Rocky Mountain Power for Approval of a Utah Fire Fund**
Rocky Mountain Power's Supplemental Information

Per the January 20, 2026, Order Vacating Scheduling Order and Setting Deadlines ("Order"), issued by the Public Service Commission of Utah ("Commission"), PacifiCorp, d.b.a. Rocky Mountain Power ("Company") hereby files supplemental information, as directed by the Order.

On January 16, 2025, the Utah Division of Public Utilities ("Division") filed comments that included recommendations to assist the parties to review the Company's application. These recommendations include:

- (i) RMP's excess liability insurance (ELI) premiums and terms, (including coverage limits) for, at least, the next policy term;
- (ii) The target amount to be raised for RMP's Fire Fund;
- (iii) A copy of the final master trust agreement ("Trust") that RMP intends to govern its Fire Fund;
- (iv) The supporting data underlying RMP's actuarial analysis; and
- (v) More granular performance data about the effectiveness of [RMP's wildfire mitigation plan] in mitigating Fire Risk and information concerning insurance costs that could potentially be reduced through [RMP's mitigation] efforts.¹

On January 20, 2026, the Commission issued the Order, directing the Company to submit the information that the Division identified as soon as practicable.² Secondly, the Order also directs the Company to "supplement its request with, at minimum, the rates and terms (including coverage limits) for the ELI coverage RMP has represented it will finalized in mid-February 2026, within five days of the rates and terms becoming final."³ The Order also directs the Company to "include with the ELI rates and terms a final copy of the Trust that it intends to govern its Fire Fund or, if it is not yet completed, the date on which the Trust will be provided to the parties."⁴

¹ DPU Comments filed Jan. 16, 2026, at 6.

² Public Service Commission of Utah, Order Vacating Scheduling Order and Setting Deadlines, Jan. 20, 2026, at 5.

³ *Id.*

⁴ *Id.* at 5-6.

RMP's Excess Liability Insurance Premiums and Terms

Berkshire Hathaway Energy (“BHE”) has procured excess liability insurance with a coverage term of February 15, 2026, to February 15, 2027. The allocation for non-wildfire excess liability insurance coverage to PacifiCorp is still being finalized. BHE procured a separate standalone policy for Utah wildfire coverage and is still compiling the insurance binder. The Company will file an update by Friday, February 27, 2026.

Target Amount for the Utah Fire Fund

The Company included a target amount of approximately \$1,090 million in its application, equal to approximately \$109 million per year, gathered over a period of ten years.⁵ The Company also proposed a re-evaluation of the collection amount in 5 years.⁶

Master Trust Agreement

The Company is actively preparing a draft master trust agreement and expects to provide it to the Commission and the parties on or around March 31, 2026. PacifiCorp commits to filing a notice to this docket if it needs additional time to circulate the trust agreement.

Supporting Data for the Actuarial Analysis

This data was provided to the intervening parties through the discovery process, specifically DPU data request sets 1, 2, 3, and 4, UAE data request set 2, and UTLCG data request set 1.

Performance Data for the Company's Wildfire Mitigation Plan

The Company is currently providing this information through the discovery process to the extent it is available, specifically DPU data request set 1 and UTLCG data request set 1.

Conclusion

The Company appreciates the opportunity to provide additional information and remains committed to working with the parties to provide all information as soon as practical as ordered by the Commission.

Sincerely,



Max Backlund
Utah State Regulatory Affairs Manager

⁵ PacifiCorp Application filed November 26, 2025, at 5.

⁶ *Id.* at 6.

CERTIFICATE OF SERVICE

Docket No. 25-035-61

I hereby certify that on February 20, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov
ocs@utah.gov

Division of Public Utilities

dpudatarequest@utah.gov

Assistant Attorney General

Patricia Schmid pschmid@agutah.gov
Robert Moore rmoore@agutah.gov
Patrick Grecu pgrecu@agutah.gov

Rocky Mountain Power

Data Request datarequest@pacificorp.com
Response Center
Jana Saba jana.saba@pacificorp.com
utahdockets@pacificorp.com
Max Backlund max.backlund@pacificorp.com
Carla Scarsella carla.scarsella@pacificorp.com

Utah Association of Energy Users (C)

Kevin Higgins khiggins@energystrat.com
Neal Townsend ntownsend@energystrat.com
Justin Bieber jbieber@energystrat.com
Keirsten Ignjatovic keirsten@energystrat.com
Phillip J. Russell prussell@jdrsllaw.com

Utah Large Customer Group (C)

Michelle Brandt King mbking@hollandhart.com
Austin W. Jensen awjensen@hollandhart.com
Adele Lee aclee@hollandhart.com
Tracy Friel tfriel@hollandhart.com

Nucor Steel-Utah (C)

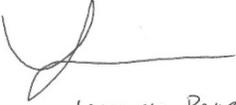
Peter J. Mattheis pjm@smxblaw.com
Eric J. Lacey ejl@smxblaw.com
Jeremy R. Cook jcook@ck.law

Western Resource Advocates (C)

Sophie Hayes sophie.hayes@westernresources.org
Karl Boothman karl.boothman@westernresources.org
Nancy Kelly nancy.kelly@westernresources.org
Jessica Loeloff jessica.loeloff@westernresources.org

Utah Clean Energy (C)

Lauren R. Barros LRB@LaurenBarrosLaw.com
Sarah Wright sarah@utahcleanenergy.org
Logan Mitchell logan@utahcleanenergy.org
Jenn Bodine jbodine@utahcleanenergy.org
Josh Craft josh@utahcleanenergy.org
Jennifer Eden jennifer@utahcleanenergy.org
Sierra Goodridge sierra@utahcleanenergy.org



Lauren Paredes

Lauren Paredes
Coordinator, Regulatory Operations