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## Action Request Response

**To:** Public Service Commission of Utah

**From:** Utah Division of Public Utilities

Chris Parker, Director  
Brenda Salter, Assistant Director  
Doug Wheelwright, Utility Technical Consultant Supervisor  
Bob Davis, Utility Technical Consultant  
Matthew Pernichele, Utility Technical Consultant

**Date:** December 30, 2025

**Re:** **Docket No. 25-035-64**, Rocky Mountain Power's Notice of Intent to Use Export Credit Rate Input

## Recommendation (No Action)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) take no further action in advance of the January 31, 2026, Annual Update to Electric Service Schedule No. 137 — Net Billing Service Annual Update.

## Issue

On December 1, 2025, Rocky Mountain Power (RMP) filed its Notice in accordance with the Commission's Order in Docket No. 17-035-61.<sup>1</sup> On December 1, 2025, the Commission asked the Division to review RMP's Notice and make recommendations by December 31, 2025.

## Background

On August 11, 2021, the Commission issued its final order in Docket No. 17-035-61 (Order), for the annual update timing, procedure, and scope of Electric Service Schedule No.137 — Net Billing Service. The record for Docket No. 17-035-61 is substantial and not repeated

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<sup>1</sup> *Order Approving Annual Export Credit Rate Update Procedures* [hereinafter Order], Docket No. 17-035-61, August 11, 2021, <https://pscdocs.utah.gov/electric/17docs/1703561/3199401703561oaaecrup8-11-2021.pdf>.



Division of Public Utilities

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here for brevity.<sup>2</sup> The Commission approved, among other conclusions and findings, an annual update of Schedule No. 137 or export credit rate (ECR) to reflect current assumptions applied to the models used to determine a reasonable ECR for the succeeding year. The Commission's Order directed RMP to file by December 1<sup>st</sup> of each year to inform parties of the inputs it intends to use for the annual ECR update at the end of January of the succeeding year.<sup>3</sup>

## Discussion

The Division has reviewed RMP's Notice of Intent to Use Export Credit Rate Input, Workpaper A, and Confidential Workpaper B (Notice).<sup>4</sup> RMP's Notice contains a description and location of the various inputs RMP intends to use for its ECR update on January 31, 2026.

Per Public Service Commission Rule R746-405-2(E), the annual review of tariff Schedule No. 137 requires an expedited review. The Commission's Order indicates that gathering the inputs for the Schedule No. 137 annual update requires RMP to begin collecting data three to four months in advance of the proposed January filing deadline.<sup>5</sup> RMP's Notice in this docket appears to follow the Commission's Order.

The complexity of calculating the annual export credit rate and the need to meet tariff filing rules requires that updated inputs be filed in advance to allow stakeholders time to vet the inputs before the March 1<sup>st</sup> annual effective date.<sup>6</sup> RMP's Notice, specifically Table 1, provides a listing of the inputs as either Annual, Most Recent GRC, Most Recent IRP, or Future, and the component of the ECR value calculation where the inputs are applied.<sup>7</sup>

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<sup>2</sup> *Commission Webpage*, Docket No. 17-035-61, <https://psc.utah.gov/2017/12/01/docket-no-17-035-61/>.

<sup>3</sup> Order at 10.

<sup>4</sup> *Rocky Mountain Power's Notice of Intent to Use ECR Input* [hereinafter Notice], Docket No. 25-035-64, December 1, 2025, <https://pscdocs.utah.gov/electric/25docs/2503564/342887RMPNtclntntUseECRInpt12-1-2025.pdf>.

<sup>5</sup> The study period runs from July 1<sup>st</sup> through June 30<sup>th</sup> of the prior year to the update.

<sup>6</sup> Order at 10, Section III, at A(ii).

<sup>7</sup> Notice at 2, Table 1.

### ***Annual Updates***

The annual update adjusted components are composed of:

- ECR energy pricing
- Capacity contribution
- Export volume
- Transmission capacity calculations consist of the twelve months ending June 2025
- Schedule No. 136 export profile (customer export volume and installed customer nameplate capacity)
- California Independent System Operator (CAISO) EIM pricing for the ELAP\_PACE-APND Node
- Utah Hourly Load
- Open Access Transmission Tariff (OATT) Transmission Rate (FERC Docket No. ER11-3643)

The Division concludes that RMP provides the various input data, information, and applicable references either by work papers, or reference to another public state or federal forum for the annually adjusted components. The Division may periodically request supporting materials for Schedule No. 136 customer export volume and capacity similar to the data provided in Docket No. 17-035-61 Utah Parties-LRS Data Request 1.

The Division notes that RMP properly adjusted the UT136 Hourly data for daylight savings time on November 3, 2024, and March 9, 2025, respectively, in RMP Workpapers A – UT Schedule 136 Export Profile, EIM and Top Load Hours, UT136\_15min Tab.

### ***Most Recent General Rate Case (GRC) Updates***

The ECR calculations for energy and capacity, which are not adjusted annually, include line loss components determined in the most recent GRC, Docket No. 24-035-04.<sup>8</sup>

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<sup>8</sup> The Division notes that RMP's General Rate Case in Docket No. 24-035-04, uses a line loss study from 2022.

### ***Most Recent Integrated Resource Plan (IRP) Updates***

The ECR calculations include integration costs from the most recent IRP (Docket No. 25-035-22). RMP intends to use the 2025 IRP integration cost projected for 2026 in this annual update.<sup>9</sup>

### ***Future Updates***

Generation Capacity and O&M costs, and Distribution Capacity costs, are not adjusted annually. The Commission set the carrying charges in its April 28, 2021, Order on Agency Rehearing.<sup>10</sup>

### **Conclusion**

The annual review of Schedule No. 137 requires a timely review of numerous components sufficient to calculate the annual ECR. The models used to determine the ECR avoided energy cost, avoided generation, transmission, and distribution capacity cost components for winter and summer are mechanical and depend on these inputs. RMP's annual filing of its Notice of Intent to Use Export Credit Rate Inputs, including workpapers and references filed by December 1<sup>st</sup>, is essential to allow adequate time for stakeholders to vet the input components, and therefore, lessen the time burden during the annual review and update of Schedule No. 137.

The Division has reviewed RMP's filing, component explanations, accompanying Workpaper A, and Confidential Workpaper B. The Division concludes that RMP's Notice of Intent fulfills the requirements set forth in the Commission's Order and requires no further action at this time. However, the Division may make future recommendations as needed for clarification of data or additional supporting information.

cc: Jana Saba, RMP  
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Michele Beck, OCS  
Service List

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<sup>9</sup> Notice at 3, Integration Costs.

<sup>10</sup> *Commission Order on Agency Rehearing*, Docket No. 17-035-61, April 28, 2021, at 13-14, <https://pscdocs.utah.gov/electric/17docs/1703561/3184591703561ooar4-28-2021.pdf>.