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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

Matthew Pernichele, Utility Technical Consultant

**Date:** February 10, 2026

**Re:** **Docket No(s). 26-035-T03 & 25-035-64**, Rocky Mountain Power's Proposed Tariff Changes to Electric Service Schedule No. 137, Net Billing Service AND Rocky Mountain Power's Notice of Intent to Use Export Credit Rate Input

## Recommendation (Approval)

The Division of Public Utilities (Division) recommends the Public Service Commission of Utah (Commission) approve Rocky Mountain Power's (RMP) proposed tariff changes to Schedule 137, Net Billing Service (Proposed ECR) with an effective date of March 1, 2026.

## Background

The Commission established the current procedure for calculating updates to the Export Credit Rate (ECR) in its Order Approving Annual Export Credit Rate Update Procedures (Order) on August 11, 2021.<sup>1</sup> The Order specified the equation for calculating the ECR, what the inputs would be for that calculation, how often they would be updated, and an annual filing schedule for routine changes. A filing would be considered Routine and be adjudicated in an expedited manner if it only adjusts certain inputs to the ECR formula. For a Routine filing, the Order required RMP to file a Notice of Intent to change the ECR and the calculations and data used to determine the new rate by December 1, prior to RMP's filing of the proposed tariff. This earlier filing is intended to accommodate for the complexity of the

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<sup>1</sup> *Application of Rocky Mountain Power to Establish Credits for Customer Generated Electricity*, Docket No. 17-035-61, Order Approving Annual Export Credit Rate Update Procedures (August 11, 2021).



Division of Public Utilities

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calculation and give parties sufficient time to analyze the filing.<sup>2</sup> The Commission's Order classifies Routine filings as an advice letter and thus subject to Utah Admin. Code R746-405-2.E.2. This regulation provides that new tariff sheets from an advice letter "shall become effective after not less than 30 calendar days from the filed date" unless the Commission orders otherwise.

RMP filed a Notice of Intent to Use ECR Input (2025 NOI) on December 1, 2025, requesting an effective date for the new tariff of March 1, 2026.<sup>3</sup> The Division filed its Action Request Response (ARR)<sup>4</sup> to the 2025 NOI on December 30, 2025, in response to an Action Request from the Commission instructing the Division to "Review Notice and Make Recommendations".<sup>5</sup>

RMP filed its proposal to change the ECR on January 26, 2026 (Proposed Tariff).<sup>6</sup> The Commission issued a Notice of Filing and Comment Period on January 28, 2026, instructing parties to submit comments on the proposed tariff by Tuesday, February 10, 2026.<sup>7</sup>

## Discussion

RMP's 2025 NOI, included the information required by the Commission's Order in Docket No. 17-035-61 for a routine filing. The NOI is in a similar form and contains similar information to recent filings requesting routine changes to the ECR. RMP's Proposed Tariff is also complete and consistent with prior filings. The workpapers and proposed tariffs in the 2025 NOI and those in the Proposed Tariff appear identical in form and content.

The Division's ARR describes the filing requirements for a change to the ECR tariff, the requirements of a Routine filing, and the Division's analysis of RMP's calculated ECR. As part of preparing the ARR, the Division checked each of the updated elements used to

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<sup>2</sup> *Id.* at 10 - 11.

<sup>3</sup> *Rocky Mountain Power's Notice of Intent to Use Export Credit Rate Input*, Docket No. 25-035-64, Rocky Mountain Power's Notice of Intent to Use ECR Input (December 1, 2025).

<sup>4</sup> Docket No. 25-035-64, Action Request Response (December 30, 2025).

<sup>5</sup> Docket No. 25-035-61, Action Request (December 1, 2025).

<sup>6</sup> *Rocky Mountain Power's Proposed Tariff Changes to Electric Service Schedule No. 137, Net Billing Service* (January 26, 2026).

<sup>7</sup> Docket No. 25-035-61, Notice of Filing and Comment Period (January 28, 2026).

calculate the ECR<sup>8</sup> back to the source listed in the table and made sure each was consistent in Confidential RMP Workpapers A, where the ECR was calculated. The Division found no errors and all the inputs used to calculate the Proposed Tariff were consistent with the correct source documents. The underlying equations in Confidential RMP Workpapers A appear to be the same as those used in last year's filings and appear to correctly calculate the ECR as mandated in the Order.

RMP's Proposed Tariff calculates the rates that Schedule 137 would recover for each kWh should be reduced from \$0.05704 to \$0.04855 in the Summer and from \$0.04199 to \$0.04033 in the Winter months. This amounts to a 15% price cut for Summer and a 4% price cut for Winter.<sup>9</sup> RMP's Table 1 shows that each of the values used to update and calculate the new ECR have decreased, with the exception of the Winter Energy charge, which increased 24%.<sup>10</sup> Many of these decreases result, at least in part, from lower historic prices in the Energy Imbalance Market.

## Conclusion

The Proposed Tariff filing is complete and consistent with the Order and similar prior filings. The Division recommends the Commission approve RMP's proposed tariff changes to Schedule 137, Net Billing Service (Proposed ECR) with an effective date of March 1, 2026.

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

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<sup>8</sup> Rocky Mountain Power's Proposed Tariff Changes to Electric Service Schedule No. 137, Net Billing Service, Table 1 at 2 (January 26, 2026).

<sup>9</sup> Rocky Mountain Power's Proposed Tariff Changes to Electric Service Schedule No. 137, Net Billing Service, Table 2 at 5 (January 26, 2026).

<sup>10</sup> *Id.*