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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

<p>In the Matter of the Application for a Deferred Accounting Order Regarding the 2026 Inter-Jurisdictional Allocation Protocol</p>	<p>Docket No. 25-035-69</p> <p>THE UTAH LARGE CUSTOMER GROUP’S UNOPPOSED MOTION TO SUSPEND PROCEDURAL SCHEDULE AND DISCOVERY</p>
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Pursuant to Utah Admin. Code R746-1-301, the Utah Large Customer Group (“UTLCG”), through the undersigned counsel, moves the Public Service Commission of Utah (“Commission”) to suspend the procedural schedule and to suspend discovery in this docket for 60 days in light of PacifiCorp’s announced agreement to transfer its Washington service territory and certain utility facilities to Portland General Electric Company (“PGE”) and Rocky Mountain Power’s (“RMP”) pending suspension request in its 2026 Inter-Jurisdictional Cost Allocation Protocol docket (Docket No. 25-035-47). As grounds for this motion, the UTLCG states the following:

CONFERRAL STATEMENT

The UTLCG conferred with the parties to this proceeding regarding the relief requested in this Motion. The Utah Division of Public Utilities supports this Motion.¹ RMP, the Utah

¹ While not parties to this proceeding, Western Resource Advocates and Utah Clean Energy, who are parties to the 2026 Inter-Jurisdictional Allocation Protocol proceeding, also support this Motion.

Association of Energy Users, and the Utah Office of Consumer Services do not oppose the relief requested.

BACKGROUND

1. On August 5, 2025, RMP filed its Application for Approval of the 2026 Inter-Jurisdictional Allocation Protocol in Docket No. 25-035-47 (the “2026 Protocol” and “2026 Protocol Docket”).

2. On December 31, 2025, RMP filed its Application for a Deferred Accounting Order Regarding the 2026 Protocol in this docket (“Application”).

3. On January 27, 2026, the Commission issued a Scheduling Order setting this proceeding for hearing on July 29, 2026.

4. On February 17, 2026, RMP announced that PacifiCorp had agreed to sell its Washington service territory and certain generation, transmission, and distribution assets to PGE (the “Washington Transfer”).²

5. On February 20, 2026, RMP filed a Motion to Suspend the 2026 Protocol Docket.³

6. The UTLCG files this Motion seeking a 60-day suspension of this docket for the same reasons articulated in RMP’s Motion to Suspend the 2026 Protocol Docket.

² See <https://www.pacificorp.com/about/newsroom/news-releases/pacificorp-to-sell-washington-service-area-to-pge.html> (last accessed Feb. 23, 2026).

³ *In the Matter of the Application of Rocky Mountain Power for Approval of the 2026 Inter-Jurisdictional Cost Allocation Protocol*, Docket No. 25-035-47, Motion to Suspend the Procedural Schedule and to Suspend Discovery (Feb. 20, 2026).

LEGAL STANDARD

Suspension of Docket

Utah Code Ann. § 54-4-1 and Utah Admin. Code R746-1-301 grant the Commission broad authority to manage procedural matters in proceedings before the Commission, including suspending or staying procedural schedules, as part of its regulatory oversight.⁴

Standard of Review for Deferred Accounting Applications

“[R]atemaking rules and principles have application and may be given greater weight than accounting rules and principles in considering whether to issue an accounting order.”⁵ An accounting order “can be justified when unforeseeable and extraordinary changes in expenses occur.”⁶

ARGUMENT

The Commission should exercise its authority under Utah Code Ann. § 54-4-1 and Utah Admin. Code R746-1-301 to suspend this proceeding and discovery for a period of 60 days. This suspension would allow the parties to evaluate the Washington Transfer’s impact, ensure consistent treatment with the related 2026 Protocol Docket, and conserve resources while outcomes remain uncertain.

⁴ See, e.g., *In the Matter of the Application of Rocky Mountain Power for Approval of Solicitation Process for Solar Photovoltaic and Thermal Resources*, Docket No. 18-035-21, Order Granting Motion to Stay Procedural Schedule at p. 1 (June 8, 2018); see also *In the Matter of Bridgerland Water Company’s Application for Culinary Water Rate Increase*, Docket No. 21-001-01, Order Granting Motion to Suspend Scheduling Order at p. 1 (Jan. 20, 2022).

⁵ *In the Matter of the Application of Rocky Mountain Power, a Division of PacifiCorp, for a Deferred Accounting Order To Defer the Costs of Loans Made to Grid West, the Regional Transmission Organization; In the Matter of the Application of Rocky Mountain Power for an Accounting Order To Defer the Costs Related to the MidAmerican Energy Holdings Company Transaction; In the Matter of the Application of Rocky Mountain Power for an Accounting Order for Costs related to the Flooding of the Powerdale Hydro Facility*, Combined Docket Nos. 06-035-163, 07-035-04, and 07-035-14, Report and Order at p. 17 (Jan. 3, 2008).

⁶ *Id.*; see also *MCI Telecomms. Corp. v. Pub. Serv. Comm’n*, 840 P.2d 765, 772 (Utah 1992).

I. The Washington Transfer Undermines the Basis of the Application.

RMP seeks authorization to establish a regulatory asset to track cost and revenue differences between the current 2020 Protocol and the proposed 2026 Protocol.⁷ This request was based on a projected \$23.4 million rate increase for Utah and a corresponding projected rate decrease for Washington.⁸ The Utah increase is driven primarily by reassigning costs and benefits associated with the Chehalis generation facility from all PacifiCorp jurisdictions to Washington alone.⁹ The Application identifies this Chehalis reassignment as one of three “primary costs for deferral.”¹⁰

The Washington Transfer fundamentally changes this calculation. PacifiCorp will sell the Chehalis facility and other Washington-based resources to PGE – the same assets underlying RMP’s 2026 Protocol cost projections.¹¹ RMP acknowledges this development “will affect the allocation of certain costs under the 2026 Protocol,” yet has not yet analyzed the Washington Transfer’s impact or prepared alternative proposals.¹²

Accordingly, the original basis for RMP’s deferred accounting request (*i.e.*, RMP’s originally proposed 2026 Protocol) no longer exists. Without alternative analyses regarding the impact of the Washington Transfer on Utah rates, the Commission cannot determine whether any

⁷ Application at ¶ 15.

⁸ *See In the Matter of the Application of Rocky Mountain Power for Approval of the 2026 Inter-Jurisdictional Cost Allocation Protocol*, Docket No. 25-035-47, Direct Testimony of Shelley E. McCoy at p. 2, line 31, Table 1; *see also id.*, Direct Testimony of Jeffrey K. Larsen at pp. 5-6, lines 94-115.

⁹ *See id.*, Direct Testimony of Shelley E. McCoy at pp. 3-5, lines 58-103.

¹⁰ Application at ¶ 7; *see also id.* at ¶ 9.

¹¹ *See* <https://www.pacificorp.com/about/newsroom/news-releases/pacificorp-to-sell-washington-service-area-to-pge.html> (last accessed Feb. 23, 2026).

¹² *In the Matter of the Application of Rocky Mountain Power for Approval of the 2026 Inter-Jurisdictional Cost Allocation Protocol*, Docket No. 25-035-47, Motion to Suspend the Procedural Schedule and to Suspend Discovery at p. 2 (Feb. 20, 2026).

remaining cost differences meet the extraordinary threshold required for deferred accounting treatment.¹³

II. Suspension Promotes Efficiency and Consistency.

The Commission should grant this motion to ensure consistent treatment across related proceedings and avoid inefficient use of resources. RMP has already requested a 60-day suspension of the 2026 Protocol Docket, acknowledging that the Washington Transfer creates uncertainty requiring further analysis. Because the deferred accounting request depends entirely on the 2026 Protocol's approval and final terms, this docket should only proceed after any suspension in the 2026 Protocol Docket is lifted.

Proceeding now would be premature and potentially futile while the underlying cost allocation framework remains in flux. Until PacifiCorp completes its analysis of the Washington Transfer's impact and presents any alternative proposals, the Commission and parties cannot meaningfully evaluate the Application. Continuing with discovery, testimony preparation, and hearings under these circumstances would waste Commission and party resources that are better dedicated to analyzing alternative cost allocations.

CONCLUSION

Based on the foregoing, the UTLCG respectfully requests that the Commission issue a decision suspending this proceeding for 60 days consistent with any suspension granted in Docket No. 25-035-47.

¹³ See *MCI Telecomms. Corp.*, 840 P.2d at 772.

Respectfully submitted on February 25, 2026.



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *The Utah Large Customer Group's Unopposed Motion to Suspend Procedural Schedule and Discovery*, was served this 25th day of February, 2026, to the following:

Via Email:

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** Denotes those with Confidentiality Agreements on file*

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