WRA EXHIBIT 2

RMP Responses to WRA Data Requests

25-035-T03 / Rocky Mountain Power
July 3, 2025
WRA Data Request 2.2

WRA Data Request 2.2

Confirm that Schedule 37 avoided cost pricing was based on the Utah 2025 IRP (Utah IRP, i.e. the preferred portfolio reflected in chapter 11 of the 2025 IRP). If not, please explain.

(a) Please explain whether past avoided cost tariff updates filed with the Utah PSC have been based on a jurisdictional subset of resources or shares of resources. If yes, please provide an example.

(b) Please explain whether the deferrable resources identified in prior avoided cost tariff updates before the Utah PSC have been limited to Utah situs-assigned resources. If not, please describe the methodological difference used to identify deferrable resources in Schedule 37 tariff updates prior to this docket.

(c) Please confirm that the allocation of expansion resources to jurisdictions as reported in the Utah 2025 IRP is not informative of the future ratemaking treatment or cost/benefit allocation to Utah customers. In other words, confirm that it is possible that Utah customers may pay for or benefit from energy and capacity associated with resources that are fully or partially assigned to other states. If not confirmed, please explain why.

Response to WRA Data Request 2.2

Confirmed. Schedule 37 avoided cost pricing was based on the Utah 2025 Integrated Resource Plan (IRP) preferred portfolio, which was determined consistent with the Public Service Commission of Utah's (UPSC) requirements in its September 24, 2024 order in Docket 23-035-10.

(a) The current Schedule 37 avoided cost pricing is limited to a subset of the resources identified in the 2023 IRP Update preferred portfolio. The jurisdictional breakout of resources in the 2023 IRP Update was summarized in Table 6.1 and Figure 6.5. In addition, please refer to Table 1 in Appendix 1 in the work papers supporting the Company's proposed avoided cost pricing in Docket 24-035-T04. The first deferrable resources in the 2023 IRP Update were selected for, and assumed to be allocated to, all of the jurisdictions.

(b) In the Utah 2025 IRP, all resources allocated to the Utah, Idaho, Wyoming, California (UIWC) jurisdiction are considered deferrable, not just those associated with Utah. Past UPSC orders have specified that avoided costs must be based on cost-effective resources. Please refer to UPSC's January 23, 2018 order in Docket 17-035-T07. The determination of which resources are required for other states' compliance requirements, and thus not deferrable by Utah qualifying facilities (QF), is made in an IRP or IRP Update. Because the costs and benefits of new contracts with Utah QFs are situs assigned to Utah, such QF contracts would not support other jurisdiction's compliance requirements.

(c) The allocation of proxy resources in an IRP has no bearing on future ratemaking treatment. Any ratemaking treatment would be determined on a project-specific basis, and would reflect the procurement mechanism (for example, resources procured through a state-specific request for proposals (RFP) would be situs-allocated to that state) as well as the resource's cost-effectiveness for the requirements in that jurisdiction.

The intent of situs-allocation is that customers in other jurisdictions are not impacted by the resources assigned to other states. The output associated with situs-allocated resources is priced at market, with the intent that the impact is comparable to what would have been paid for equivalent power from other market participants (i.e. other utilities). As a result, other than indirect impacts related to market supply, Utah customers would not pay for or receive benefits from resources that are assigned to other states.

25-035-T03 / Rocky Mountain Power
July 3, 2025
WRA Data Request 2.3

WRA Data Request 2.3

In the 2025 IRP Volume I, Tables 9.4 on page 222 and12.4 on page 343, which both show the Utah, Idaho, Wyoming and California share of expansion resources, include substantially different resources.

(a) Can the difference between Table 9.4 and Table 12.4 be entirely explained by modeling developments between the Utah lockdown date and the publication of the final 2025 IRP? If not, please explain.

(b) Explain why avoided costs based on out of date modeling assumptions are reflective of actual avoided costs.

(c) Confirm that only the shares of resources listed in the UIWC Table, 12.4, are assumed to be deferrable for purposes of calculating Schedule 37 prices. If not, please explain.

(d) Are any of the answers to the foregoing questions (2-3.a-c) different when applied to Schedule 38 pricing? Please explain for each answer that is different.

Response to WRA Data Request 2.3

(a) Yes. Differences are attributed to modeling developments between the Utah lockdown date and the publication of the final 2025 Integrated Resource Plan (IRP).

(b) The approved Schedule 37 methodology is based on the preferred portfolio in an Integrated Resource Plan (IRP) or IRP Update. The Utah 2025 IRP was determined consistent with the Public Service Commission of Utah's (USPC) requirements in its September 24, 2024 order in Docket 23-035-10. While PacifiCorp has not prepared avoided costs for Utah based on the 2025 IRP preferred portfolio in Chapter 9, it does not expect that the results would change dramatically. Schedule 37 rates are normally based on somewhat out-of-date modeling assumptions as a result of the time between annual updates.

(c) Confirmed.

(d) The Schedule 37 and Schedule 38 methodologies are identical, except that Schedule 38 accounts for the potential qualifying facility (QF) queue and uses project-specific inputs. With regard to subpart (b), because relevant input updates are incorporated continuously, rather than annually following UPSC approval, Schedule 38 generally does not have as much lag as Schedule 37. The Schedule 38 procedures do allow a QF to retain its avoided cost pricing for up to six months between indicative pricing and contract execution, so some lag still exists.

25-035-T03 / Rocky Mountain Power
July 3, 2025
WRA Data Request 2.14

WRA Data Request 2.14

In IRP modeling, what is the $ value of renewable energy credits/certificates (RECs) PacifiCorp assumes as an offset to renewable resource capital costs?

(a) Does the assumed REC value change over the planning horizon? If so, please explain.

Response to WRA Data Request 2.14

PacifiCorp does not assume a specific dollar value for renewable energy credits (REC) in Integrated Resource Plan (IRP) modeling. While renewable energy targets in Washington and Oregon involve cost drivers based on renewable energy output required for compliance, those drivers are not intended to represent a cost savings associated with renewable output.

Note: as part of Schedule 37 and Schedule 38, qualifying facilities (QF) only deliver RECs to the utility during that portion of their contract term in which they are compensated based on the cost of a renewable resource. For example, under the proposed rates, wind QFs seeking fixed price contracts would retain their RECs until 2027 and would deliver their RECs to the utility from 2028 until the end of their contract. Because avoided cost pricing for wind QFs in 2028 is based on a proxy wind resource that would otherwise have generated RECs for customers, the REC from the QF in that timeframe does not result in incremental benefits for customers.

(a) There is no assumed value for RECs relevant to Utah customers. Please refer to the Company's response above.