

## First-Person Oral Summary for the Record — Direct Testimony of Thomas R. Burns (Docket No. 26-035-05)

My name is Thomas R. Burns. I am Vice President of Resource Planning and Acquisitions for PacifiCorp, doing business as Rocky Mountain Power. In this proceeding, I provide economic analysis supporting the Company's decision to enter into a new Large Load Service Contract (LLSC), or "proposed LLSC," between Rocky Mountain Power and the proposed customer. My testimony explains how the proposed LLSC meets the requirements of Utah's Large Load Act and the Large Load Rules, and why approval of the proposed LLSC is reasonable and in the public interest.

### Summary of my analysis

At a high level, my analysis is intended to demonstrate three things: first, that the large-load customer will bear the resource costs attributable to receiving this service; second, that existing retail customers will receive a benefit from the proposed LLSC; and third, there is no material risk to reliability for existing retail customers.

I performed simulations using the PLEXOS optimization tool—the production cost model the Company uses in the IRP process. I started with the 2025 IRP preferred portfolio and its load forecast, then added the Customer's demand (grossed up for system losses) and added the proposed resources. The model was allowed to economically dispatch generation and optimize market purchases, consistent with the methodology described in my testimony. This benefited existing retail customers.

On reliability, the model results indicate no material change in energy not served, or ENS, under normal conditions, the scenario removing market purchases, and the most challenging stochastic year, 2013, as compared to the 2025 IRP preferred portfolio. In my view, the results are consistent with maintaining reliability comparable to the preferred portfolio.

Based on this PLEXOS economic and reliability analysis, I conclude that the Company's decision to enter into the Proposed LLSC is prudent and will not cause harm to Rocky Mountain Power's retail customers.

### My recommendation

For those reasons, I recommend that the Commission determine that the Company's decision to enter into the Proposed LLSC is prudent, is in the best interest of Rocky Mountain Power's retail customers, and is compliant with the requirements laid out in the Large Load Act.

