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Division of Public Utilities
UTAH DEPARTMENT OF COMMERCE

MARGARET W. BUSSE
Executive Director

CHRIS PARKER
Division Director

Memorandum

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
Annette Orton, Utility Analyst
Savannah Torman, Utility Analyst

Date: July 15, 2026

Re: **Docket No. 26-035-11,** Rocky Mountain Power's Application to Revise Rates in Tariff Schedule 98, Renewable Energy Credits Balancing Account.

Recommendation (Approval)

Based upon the Utah Division of Public Utilities' ("DPU" or "Division") comprehensive review and audit of Rocky Mountain Power's ("RMP" or "Company") Renewable Energy Credits (RECs), the Division recommends that the Public Service Commission of Utah ("PSC" or "Commission") approve the interim rates set under this docket as final.

Issue

The Division hereby submits for filing the Division's 2025 Audit Report of the Rocky Mountain Power, Renewable Energy Credits Balancing Account (RBA).

Discussion

On May 29, 2026, the Commission issued its Order approving RMP's proposed RBA on an interim basis pending the Division's audit report, with an effective date of June 1, 2026.

The Division reviewed numerous documents during its audit, including direct testimony, RMP's initial and supplemental responses to Data Requests, RMP's REC sales, request for

proposals, RMP's reverse request for proposals, RMP's REC revenue contracts, renewable costs in base rates, the REC budget for 2025 and 2026, REC policies and procedures, and previous RBA filings. The Division also reviewed and verified that the fees billed by the Company to Kennecott comply with the confidential Non-Generation and REC Supply Agreement between Kennecott Utah Copper LLC and PacifiCorp, dated April 18, 2019. Based on this review, it appears the RBA is prudently managed and follows regulatory and reporting requirements.

The numbers reflect the accurate revenue from the REC sales and the proper allocation of resources, which further supports the Division's recommendation for the interim rates to be made final.

Conclusion

Based on a review of the associated 2025 REC tariff, Schedule 98, and related 2025 filings with the Public Service Commission of Utah, Rocky Mountain Power appears to be prudently managing the program and complying with regulatory and reporting requirements. Therefore, the interim rates appear to be in the public interest and should be made final.

cc: Jana Saba, Rocky Mountain Power
Max Backlund, Rocky Mountain Power
Michele Beck, Office of Consumer Services
Service List