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**BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH**

In the Matter of the Application of PacifiCorp d/b/a Rocky Mountain Power for Approval and Report of the Sale of Washington Service Area and an Accounting Order	Docket No. 26-035-20 <b>PETITION FOR LEAVE TO INTERVENE OF THE UTAH LARGE CUSTOMER GROUP</b>
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Pursuant to Utah Code Ann. § 63G-4-207 and Rule R746-1-108, the Utah Large Customer Group (“UTLCG”) files this Petition for Leave to Intervene in the above-captioned docket. In support of this Petition, the UTLCG states the following:

1. The UTLCG is an unincorporated association of certain Rocky Mountain Power (“RMP” or the “Company”) Schedule 9 customers in the State of Utah.
2. As among RMP’s Schedule 9 customers, UTLCG members receive and pay for electric service from RMP.
3. On April 6, 2026, RMP filed its application in the above-captioned docket, seeking approval to sell PacifiCorp’s Washington service territory and certain Washington-based assets

(collectively, the “Service Area Transfer”) to Gem Sub LLC (“Gem”), an affiliate of Portland General Electric Company. The base purchase price for the Service Area Transfer is approximately \$1.9 billion. The assets to be sold include the 477 MW Chehalis combined cycle gas turbine power plant, the 94 MW Goodnoe Hills Wind Farm, and the 234 MW Marengo I and II Wind Farms, as well as 393 miles of transmission lines. RMP claims that the Service Area Transfer will benefit Utah customers through a proposed \$68.9 million rate credit funded by the gain on sale, to be amortized over three years at approximately \$23.0 million annually. RMP proposes to apply the 2020 Inter-Jurisdictional Allocation Protocol (“2020 Protocol”) to analyze and allocate the costs and benefits of the Service Area Transfer, even though the 2020 Protocol expired at the end of 2025. RMP requests approval of the asset sale by March 1, 2027.

4. The UTLCG seeks to intervene in this proceeding because the Commission’s ultimate determination may significantly impact UTLCG members’ rates for electric service. The Service Area Transfer will result in a reallocation of system costs among the remaining five states, with RMP estimating an increase of approximately \$20.2 million in Utah’s non-net power cost revenue requirement. Utah’s allocation factors will increase when Washington is removed from the system, and UTLCG members, as large RMP customers, are particularly susceptible to such allocation changes. The proposed transaction also raises significant questions regarding the appropriate cost allocation methodology, particularly given that the 2020 Protocol has expired and the 2026 Protocol proceeding (Docket No. 25-035-47) was suspended in connection with the announcement of this transaction. The UTLCG has a direct and substantial interest in ensuring that Utah customers receive appropriate value from the transaction’s gain on sale, that the proposed

rate credit and other claimed benefits adequately offset incremental costs, and that the cost allocation methodology used to evaluate the Service Area Transfer is appropriate. Accordingly, UTLCG members' legal rights and interests will be substantially affected by this proceeding.

5. The nature and quantity of any evidence to be presented by UTLCG in this proceeding is not yet known and UTLCG reserves the right to participate as its interests may appear. Without intervenor status, UTLCG is unable to evaluate the extent to which RMP's application may adversely impact member rates or otherwise determine UTLCG's position in this matter.

6. The intervention deadline set in this proceeding is December 21, 2026. Therefore, the UTLCG's Petition is timely.

7. Notices in this proceeding should be sent to the following:

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WHEREFORE, the UTLCG respectfully requests leave to intervene in this proceeding as a full party to protect its interests and the interests of its members.

DATED this 21st day of April, 2026.

/s/Michelle Brandt King  
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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing *Petition for Leave to Intervene of the Utah Large Customer Group*, was served this 21st day of April, 2026, to the following:

Via Email:

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