

October 9, 2026

VIA ELECTRONIC FILING

Utah Public Service Commission
Heber M. Wells Building, 4th Floor
160 East 300 South
Salt Lake City, UT 84114

Attention: Gary Widerburg
Commission Administration

RE: **Docket No. 26-035-37 – Rocky Mountain Power’s Application to Amend
Tesoro Refining & Marketing Company LLC Power Purchase Agreement**
Rocky Mountain Power’s Reply Comments

Per the September 4, 2026, Scheduling Order and Notice of Virtual Hearing in Docket No. 26-035-37, PacifiCorp, d.b.a. Rocky Mountain Power (“Company”), submits these reply comments. On October 5, 2026, the Division of Public Utilities (“Division”) filed comments (“Division’s Comments”) on the Company’s Application to Amend the Tesoro Power Purchase Agreement. The Division’s comments recommend that the Public Service Commission of Utah (“Commission”) approve the application with conditions.¹

Summary of the Division’s Comments

The Division “recommends the Public Service Commission of Utah approve the Power Purchase Agreement Second Amendment dated July 28, 2026 between PacifiCorp and Tesoro Refining and Market Company LLC, conditioned on (1) correction of the October – May on-peak price stated in the Company’s confidential Exhibit E to match the valued derived in the Utility’s supporting workpaper and (2) correction the HourCount calculations and corresponding effective months of the pricing. In addition, the Division recommends that the Utility continue to provide reports, at least quarterly, of hourly power purchased to allow the Division to continue to monitor this contract.”²

Response to the Division’s Comments

The Company appreciates the Division's review of the application. The Company includes with these comments a corrected Confidential Exhibit E and the associated workpaper, with the corrected on-peak pricing. The corrected exhibit and workpaper also correct the HourCount calculations and the corresponding effective months of the pricing. Confidential information is provided subject to R746-1-602 and 603 of the Public Service Commission of Utah Rules.

¹ Rocky Mountain Power’s Application to Amend Tesoro Refining & Marketing Company LLC Power Purchase Agreement, Docket No. 26-035-37, Confidential Comments from the Division of Public Utilities, at 1 (October 5, 2026).

² *Id.* at 1.

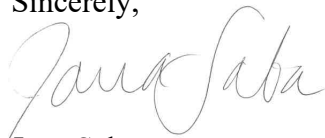
Because contract effectiveness is contingent upon Commission approval, the Power Purchase Agreement Second Amendment dated July 28, 2026, has not become effective. Accordingly, the Company submits an updated Power Purchase Agreement Second Amendment dated October 8, 2026, which incorporates the DPU-recommended corrections to the pricing set forth in Exhibit E. As a result of those corrections, the previously filed amendment has been superseded, and the Company is submitting a new fully executed amendment with these reply comments.

The Company agrees to the Division's recommendation for continued reporting of quarterly hourly power purchased.

Conclusion

The Company appreciates the Division's review of the application and this opportunity to provide reply comments with the corrected exhibit and the new fully executed amendment. The Company respectfully requests that the Commission approve the Company's application with the corrected on-peak pricing, exhibit and workpapers.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jana Saba".

Jana Saba

Director, Regulatory Affairs and Operations

CERTIFICATE OF SERVICE

Docket No. 26-035-37

I hereby certify that on October 9, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

Utah Office of Consumer Services

Michele Beck mbeck@utah.gov
ocs@utah.gov

Division of Public Utilities

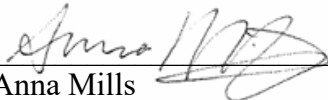
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Anna Mills
Coordinator, Regulatory Operations

**SECOND AMENDMENT TO
NON-FIRM POWER PURCHASE AGREEMENT**

This Second Amendment (this “Amendment”) to the Non-Firm Power Purchase Agreement entered into on September 30, 2024 (as amended by the First Amendment dated July 18, 2025, the “Agreement”), is entered into by and between PacifiCorp and Tesoro Refining & Marketing Company LLC. This Amendment will become effective on the date associated with the signature of the last Party to sign it. All defined terms used but not defined in this Amendment have the meanings provided to them in the definition for such terms in the Agreement.

WHEREAS the Parties wish to extend the term of the Agreement and establish the pricing for the extension period;

The Parties agree as follows:

1. Section 2.2 of the Agreement is hereby replaced in its entirety with the following:
“Unless terminated sooner as provided herein, this Agreement shall terminate at 24:00:00 MPT December 31, 2027.”
2. The Exhibit E attached hereto as **Attachment 1** will replace Exhibit E of the Agreement in its entirety effective as of January 1, 2027.
3. Effective as of January 1, 2027, the Line Loss Factor, as defined in Section 5.1, shall be 1.0261 for the period for which the Agreement is extended by this Amendment.
4. Except as expressly modified and amended in accordance with the provisions of this Amendment, all other terms and conditions of the Agreement remain in full force and effect and continue to bind the Parties. In the event of a conflict, this Amendment shall have the highest precedence over Agreement or previous amendments. The Parties executing this Amendment warrant that they have the requisite authority to do so.

By signing below, the duly authorized representatives of the Parties indicate their agreement to the terms of this Amendment.

**Tesoro Refining & Marketing
Company LLC**

By: 
Name: Stuart Smith
Title: Power Book Lead
Date: 10/02/2026

PacifiCorp

By:  **Rick Link**
Name: Rick Link
Title: SVP, Regulation
Date: October 8, 2026

Digitally signed by Rick Link
Date: 2026.10.08 08:06:50 -07'00'



Approved as to form.

Attachment 1

EXHIBIT E
PRICING (\$/MWh)

Year	June - September		October – May	
	Peak	Off-Peak	Peak	Off-Peak
2027				