

September 18, 2026

***VIA ELECTRONIC FILING***

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

Attention: Gary Widerburg  
Commission Administration

RE: **Docket No. 26-035-T08—Rocky Mountain Power’s Filing in Compliance with the PSC’s Order Issued on July 31, 2026 in Docket No. 24-035-04, Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations**  
*Rocky Mountain Power’s Reply Comments*

On August 25, 2026, PacifiCorp, d.b.a. Rocky Mountain Power (“Company”), filed proposed revisions to Electric Service Schedule No. 92 – GRC Settlement Deferral Adjustment to collect the additional deferred revenue for the period of August 10, 2026 through August 20, 2026. On September 1, 2026, the Public Service Commission of Utah (“Commission”) issued a Notice of Filing and Comment Period. On September 11, 2026, the Division of Public Utilities (“Division”) filed comments on the Company’s proposed revisions. The Company submits these reply comments in response to the Division’s comments.

The Division recommends the Commission approve the proposed tariff revisions as complying with the Commission’s Order<sup>1</sup> and Settlement Stipulation.<sup>2</sup> The Division notes that the deferred amount is recovered through a fixed percentage surcharge and that actual collections will not equal the target amount.<sup>3</sup> The Division states that the use of 2025 billing components and shorter recovery timeline will exacerbate the variance.<sup>4</sup> The Division recommends a true-up mechanism for any difference collected, to be credited or collected from the appropriate customers.<sup>5</sup>

The Company responds that nearly all base rates in general rate cases are subject to variation from their intended revenue targets and cannot be expected to collect the precise amounts for which they were designed. Schedule 92 is designed to collect base revenue, for which the company typically does not reconcile or track actual revenue collection to the approved target revenue. The revision

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<sup>1</sup> Order Approving Settlement Stipulation, Docket No. 24-035-04, July 31, 2026.

<sup>2</sup> Settlement Stipulation, Docket No. 24-035-04, June 29, 2026.

<sup>3</sup> *Rocky Mountain Power’s Filing in Compliance with the PSC’s Order Issued on July 31, 2026 in Docket No. 24-035-04, Application of Rocky Mountain Power for Authority to Increase its Retail Electric Utility Service Rates in Utah and for Approval of its Proposed Electric Service Schedules and Electric Service Regulations*, Docket No. 26-035-T08, Comments from the Division of Public Utilities, at 2 (September 1, 2026). (“Division’s Comments”).

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

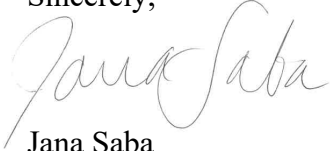
of Schedule 92 to collect the additional deferral from August 10, 2026 to August 20, 2026 is aligned with the Commission Order and the stipulation.

The Commission's August 20, 2026 Order approved the Company's filing, including the Schedule 92 rates, and did not require the establishment of a true-up mechanism to reconcile any differences in revenues collected. Accordingly, the Company believes implementation of the true-up mechanism recommended by the Division is unnecessary.

### **Conclusion**

The Company appreciates this opportunity to provide reply comments to the Division's initial comments filed on September 11, 2026, and respectfully requests that the Commission approve the proposed tariff revisions.

Sincerely,

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

Jana Saba

Director, Regulatory Affairs and Operations

## **CERTIFICATE OF SERVICE**

Docket Nos. 24-035-04, 23-035-40, 23-035-44, 24-035-01

I hereby certify that on September 18, 2026, a true and correct copy of the foregoing was served by electronic mail to the following:

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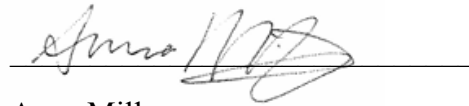
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A handwritten signature in black ink, appearing to read "Anna Mills", is written over a horizontal line.

Anna Mills  
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