State of Utah

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Public Service Commission

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Commissioner

October 9, 2026

Mr. Max Backlund
Rocky Mountain Power
1407 West North Temple, Suite 330
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Data Request Response Center
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Re: *Rocky Mountain Power's Filing in Compliance with the Public Service Commission'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

Dear Mr. Backlund:

The Public Service Commission ("PSC") reviewed Rocky Mountain Power's August 25, 2026, filing ("Filing") reflecting revisions to Electric Service Schedule No. 92 ("Schedule 92 Tariff Revisions"). Schedule 92 is designed to collect the deferred revenue for the period of July 1, 2026 through August 9, 2026, as stipulated to by parties in Docket No. 24-035-04[1] ("2024 GRC Settlement") and approved in the PSC's July 31, 2026 Order Approving Settlement Stipulation ("Order Approving Settlement").[2] RMP effectuated the original Schedule 92 rates in its billing system on August 21, 2026.[3] The Schedule 92 Tariff Revisions adjust the Schedule 92 Rates we approved in our Tariff P.S.C.U. No. 52 Approval Letter for the deferred revenue from

[1] *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. 24-035-04, the "2024 GRC Docket").
[2] On August 5, 2026, RMP filed with the PSC 2024 GRC tariff revisions with an effective date of August 10, 2026, which the PSC approved on August 20, 2026 ("Tariff P.S.C.U. No. 52 Approval Letter"). The Tariff P.S.C.U. No. 52 Approval Letter also authorized RMP to implement Schedule 92 rates pursuant to the Order Approving Settlement. The Schedule 92 rates approved on August 20, 2026, assume a 40-day, July 1, 2026, through August 10, 2026 deferral period ("Schedule 92 Deferral Period") of $10 million = $93 million ÷ 12 x (1+(9÷31)), to be recovered ("Schedule 92 Recovery Amount") during August 10, 2026 through December 31, 2026 ("Schedule 92 Recovery Period").
[3] The Filing at page 1.

August 10, 2026 through August 20, 2026. RMP states that the Schedule 92 Tariff Revisions "will ensure Schedule 92 fully collects the deferred revenues as allowed by the Settlement Stipulation."[4] RMP included a redline version of the Tariff Revisions and the supporting workpapers. RMP seeks a Schedule 92 effective date of September 25, 2026.

The PSC reviewed the comments from the Division of Public Utilities (DPU) filed on September 11, 2026 (the "DPU Comments"), as well as RMP's September 18, 2026 Reply Comments (the "RMP Reply Comments"), each submitted in response to the PSC's September 1, 2026, Notice of Filing and Comment Period. No other comments were filed.

Based on its review of the Filing, DPU concludes the Schedule 92 Tariff Revisions align with the Order Approving Settlement and the Tariff P.S.C.U. No. 52 Approval Letter. Accordingly, DPU recommends the PSC approve the Schedule 92 Tariff Revisions as filed. Additionally, DPU proposes RMP implement a true-up mechanism so that any over- or under-collection is credited to or recovered by the appropriate customers. DPU observes that the deferred amount is recovered through a fixed percentage surcharge, so actual collections will not equal the authorized amount. According to DPU, the method RMP used to derive the class percentages uses slightly outdated 2025 Test Year billing determinants. Adding to this, the more compressed deferral recovery timeline compounds any forecast error into a larger collections error. DPU cautions the over- or under-collected amount in question warrants a true-up mechanism.

RMP responds that a true-up mechanism is neither necessary nor directed by the Tariff P.S.C.U. No. 52 Approval Letter. RMP reasons 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 RMP ordinarily does not reconcile or track actual revenue collection to the approved target revenue.

Based on the PSC's review of the Schedule 92 Tariff Revisions and the DPU Comments, the PSC approves the Schedule 92 Tariff Revisions as filed, effective September 25, 2026.

As to the Schedule 92 true-up recommendation, RMP's own reasoning for its Filing, to "ensure Schedule 92 fully collects the deferred revenues as allowed by the [June 29, 2026,] Settlement Stipulation [in the 2024 GRC Docket]" is consistent in principle with DPU's recommendation that ratepayers bear no more than what is fully owed under the Order Approving Settlement Stipulation. RMP's reasoning that it

[4] *Id.*

cannot be expected to collect the precise amounts for which base rates were designed, if nothing else, supports a Schedule 92 true-up. In this Filing, RMP is requesting an adjustment to a base rate set as part of a general rate case. We find and conclude that a true-up filing aligns with our Order Approving Settlement Stipulation. Accordingly, we direct RMP to submit a true-up filing of Schedule 92 Tariff by March 1, 2027. The true-up filing shall reconcile Schedule 92 revenue collections against the entire Schedule 92 Deferral Period from July 1, 2026, through August 20, 2026.

Sincerely,

/s/ Gary L. Widerburg
PSC Secretary
DW#347357