

BEFORE THE PUBLIC SERVICE COMMISSION OF WYOMING

IN THE MATTER OF THE APPLICATION
OF ROCKY MOUNTAIN POWER FOR
AUTHORITY TO JOIN THE EXTENDED
DAY AHEAD MARKET

DOCKET NO. 20000-675-EA-24
(Record No. 17731)

**WYOMING INDUSTRIAL ENERGY CONSUMERS' MOTION TO STAY
PROCEEDING AND REQUIRE SUPPLEMENTAL INFORMATION AND MOTION
FOR SHORTENED RESPONSE TIME**

The Wyoming Industrial Energy Consumers (“WIEC”) respectfully move the Wyoming Public Service Commission (“Commission”) to stay this proceeding and require Rocky Mountain Power (“RMP” or the “Company”) to file supplemental information supporting the application for authority to join the extended day ahead market (“EDAM”). Further, WIEC respectfully requests that the Commission shorten response deadlines to this motion given quickly approaching case deadlines or, in the alternative, toll the upcoming procedural schedule while this motion is being considered. As grounds for this motion, WIEC states the following:

INTRODUCTION AND BACKGROUND

1. On October 10, 2024, and October 17, 2024, RMP gave a presentation to the Commission at an open meeting regarding RMP’s intention to join the California Independent System Operator’s (“CAISO”) EDAM.
2. On February 7, 2025, the Commission issued an order in Docket No. 90000-184-XO-24 (Record No. 17742) (“Order”) asserting jurisdiction over RMP’s decision to join the EDAM.
3. In the Order the Commission found “it is in the public interest to require [the Company] to file an application requesting the Commission’s authorization to participate in the EDAM.”¹

¹ Order at 3, ¶ 8.

4. The Order further directed the Company to “file an application for authority to join the EDAM ... that shall...address the anticipated benefits and risks of participation in the EDAM” and “include all pertinent information that would be required by Commission Rule, Chapter 3, Section 21(f)(i).”²
5. The Company did not appeal the Order.
6. On December 30, 2024, and February 18, 2025, respectively, the Company filed the initial Application and Amended Application (collectively, the “Application”) in this docket.
7. The Application is supported by the Direct Testimony of Company witness Michael Wilding.
8. On April 11, 2025, WIEC filed a Petition to Intervene and Request for Hearing, which the Commission granted at the April 29, 2025, open meeting.
9. On April 28, 2025, the Commission adopted the Scheduling Order, which set this matter for public hearing on July 9, 2025.
10. WIEC files this Motion pursuant to Wyo. Stat. § 37-2-112, Commission Rule Chapter 2, Section 13(a), and the ripeness doctrine, seeking an order staying this proceeding and requiring the Company to file supplemental information in support of the Application.
11. This Motion is timely pursuant to Commission Rule Chapter 2, Section 13 and the Scheduling Order.

LEGAL STANDARD

General Authority:

Wyo. Stat. § 37-2-112 grants the Commission “general and exclusive power to regulate and supervise” Wyoming public utilities. In its exercise of this power, the Commission’s overriding obligation is to reach a decision that is in the public interest. The Wyoming Supreme

² *Id.* at 3, ¶ 1.

Court requires the Commission to “give paramount consideration to the public interest” in performing its duties, bearing in mind that “the desires of the utility are secondary.”³

The Commission has described this scope of this authority as follows:

While this general and exclusive power is not unlimited, intended and proposed actions of a public utility not specifically addressed by other provisions of the Wyoming Statutes or the Commission’s Rules that may have profound and lasting effects on the utility’s ability to discharge its duty to provide safe, adequate and reliable service at just and reasonable rates are necessarily subject to this general and exclusive authority and to Commission approval after public notice and opportunity for hearing. It is the Commission’s responsibility to recognize situations where a utility is poised to commit to a course that may not be easily alterable and may materially impact the public interest, and to subject the decision to a transparent public process.⁴

Authority to Manage Docket:

Commission Rule Chapter 2, Section 14(b) requires the Commission to “set the course of proceedings” by, *inter alia*, scheduling conferences, deadlines, and an evidentiary hearing. This authority extends to the right to amend the procedural schedule, stay proceedings, and order supplemental filings.⁵

Ripeness:

The ripeness doctrine is a category of justiciability developed to identify appropriate occasions for adjudication.⁶ “Ripeness is peculiarly a question of timing, intended to prevent the courts, through avoidance of premature adjudication, from entangling themselves in abstract disagreements. In short, the doctrine of ripeness is intended to forestall judicial determinations

³ *Pacificorp v. PSC*, 103 P.3d 862, 867 (Wyo. 2004); *Mountain Fuel Supply Co. v. Pub. Serv. Comm’n*, 662 P.2d 878, 883 (Wyo. 1983).

⁴ Order at 2, ¶ 6.

⁵ See, e.g., Order Granting Motion to Continue Hearing and Request for Scheduling Conference (Aug. 8, 2018), Docket No. 20000–505–EC–16 (Record No. 14579); Order Rejecting Stipulation, Staying Further Proceedings, and Directing Company to File Amended Application (Nov. 30, 2007), Docket No. 20000–264–EA–06 (Record No. 10960).

⁶ *Moose Hollow Holdings, LLC v. Teton Cty. Bd. of Cty. Comm’rs*, 396 P.3d 1027, 1033 (Wyo. 2017) (citing *Abbott Laboratories v. Gardner*, 387 U.S. 136, 87 S.Ct. 1507, 1515 (1967)) (citation omitted).

of disputes until the controversy is presented in clean-cut and concrete form.”⁷ To determine if an issue is ripe for review, tribunals consider (1) the fitness of the issues presented for review; and (2) the hardship to the parties if review is withheld.⁸ The first element focuses on “whether the case involves uncertain or contingent future events that may not occur as anticipated, or indeed may not occur at all,” and evaluates factors including “whether determination of the merits turns upon strictly legal issues or requires facts that may not yet be sufficiently developed.”⁹ The second element considers “whether the challenged action creates a direct and immediate dilemma for the parties.”¹⁰

ARGUMENT

The Commission should exercise its authority under Wyo. Stat. § 37-2-112 and Commission Rule Chapter 2, Section 14(b) to stay this proceeding and require the Company to file supplemental information supporting the Application because the Company has not complied with the Order’s directives to (1) request Commission authorization to join the EDAM and (2) address benefits and risks associated with participating in the EDAM and provide all pertinent information required by Commission Rule, Chapter 3, Section 21(f)(i). The Commission should also stay the proceeding because the requested relief is not ripe for a decision due to material uncertainties concerning the final structure of the EDAM. Specifically, this case should be stayed pending final resolution of potential amendments to the CAISO’s EDAM tariff that are under consideration as a result of PacifiCorp’s pending Federal Energy Regulatory Commission (“FERC”) proceeding.

⁷ *New Mexicans for Bill Richardson v. Gonzales*, 64 F.3d 1495, 1499 (10th Cir. 1995) (citations omitted).

⁸ *BHP Petroleum Co. v. State*, 766 P.2d 1162, 1165 (Wyo. 1989).

⁹ *Gonzales*, 64 F.3d at 1499 (citations omitted).

¹⁰ *Id.* (citations omitted).

I. The Application does not request authorization to participate in the EDAM.

The Application does not comply with the Order's directive to "request[] the Commission's *authorization* to participate in the EDAM."¹¹

The Company frames the Application as a notification to the Commission of "the Company's *intent* to enter into and participate in the EDAM" and requests a "determination that [the Company's] EDAM participation will benefit customers and is in the public interest."¹² The Company's response to discovery (reproduced below) confirms that the Application does not request the Commission's authorization to join the EDAM:

WIEC Data Request 1.4: Refer to RMP's Amended Application in this proceeding at pages 8-9. Is it an accurate interpretation of RMP's Amended Application that RMP is not asking the Commission for authorization to join the EDAM? Please explain your answer in detail.

Response to WIEC Data Request 1.4: [...] Rocky Mountain Power has requested that the Commission make a determination that EDAM participation will benefit customers and is in the public interest.

The Company further asserts that its intention to join the EDAM *does not* constitute "a change in control of utility property or otherwise *require[] the express approval of the Commission,*" and indicates it is reserving the right to raise "jurisdictional or preemption claims that may arise as a result of a future order of the Commission" that conflicts with the Company's desires.¹³ As noted above, the Company did not appeal the Commission's Order requiring the Company to submit the Application; thus, to the extent RMP questions the Commission's jurisdiction over its decision to join the EDAM, it waived its opportunity to challenge the Commission's finding regarding jurisdiction through the Order. Regardless of RMP's veiled threat of litigation and its decision not to appeal the Order, the Commission undoubtedly has the

¹¹ Order at 3, ¶ 8 (emphasis added).

¹² Application at 8-9 (emphasis added); *see also id.* at 1 ("[RMP] provides the [Commission] with this [Application] regarding the Company's preparations to enter and participate in the [CAISO] [EDAM]." (emphasis added)).

¹³ *Id.* at 3, ¶ 5 n.2 (emphasis added).

authority to approve or reject the Company’s decision to join the EDAM. *PJM Interconnection, L.L.C.*, 191 F.E.R.C. P61,056 (Apr. 17, 2025) (noting that states “retain the authority under their inherent police powers to decide whether to allow their utilities to join, not join, or leave RTOs”); *cf. Dayton Power & Light Co. v. FERC*, 126 F.4th 1107, 1113 (6th Cir. 2025) (state law mandate to join RTO was not preempted).

The Application explicitly fails to comply with the Order’s directive to request Commission authorization of the Company’s plan to join the EDAM, and therefore fails to demonstrate that the requested relief is in the public interest. The Commission should exercise its authority under Wyo. Stat. § 37-2-112 and Commission Rule Chapter 2, Section 14(b) to stay this proceeding and order that the Company amend the Application to comply with the Commission’s directive.

II. The Application is not supported by a sufficient evaluation of benefits, risks, and customer impacts that is informed by a thorough comparison of alternative market options.

The Application does not comply with the Order’s directive to “address the anticipated benefits and risks of participation in the EDAM” and “include all pertinent information that would be required by Commission Rule, Chapter 3, Section 21(f)(i).”¹⁴

Commission Rule, Chapter 3, Section 21(f)(i) states:

(f) A utility shall file an application and obtain Commission approval prior to abandoning, transferring, selling, leasing, discontinuing the use of, or otherwise disposing of, relinquishing complete or partial operational control of, or, in the case of an electrical generation facility, converting to the use of a different primary fuel, any utility plant or facilities used or useful in providing service to the public.

(i) The application shall include: (A) Studies of past, present and prospective customer use of the subject service, plant or facility; (B) A description of any

¹⁴ Order at 3, ¶ 1.

impact of the proposed action on other public utilities; and (C) A description of any anticipated cost savings to customers.

While the Application includes a high-level summary of the anticipated benefits and cost savings associated with EDAM participation, it provides little or no analysis of the associated risks and, more importantly, fails to support its analysis with a meaningful assessment of the relative benefits, risks, and cost-savings associated with participation in the EDAM *as compared to* alternative day-ahead markets such as the Southwest Power Pool's ("SPP") Markets+ and the SPP Regional Transmission Organization ("RTO") Expansion.

The Application's discussion of risk is limited to a brief explanation of the Company's preference for joining the EDAM as a first participant and assertion that the EDAM will succeed based on the Company's successful experience as a first participant in the Western Energy Imbalance Market ("WEIM"). The Company further argues that the EDAM's flexible exit provisions sufficiently mitigate risk.¹⁵ But the Application fails to substantively address specific, material risks, such as the concerns raised by stakeholders in the pending FERC proceeding that the EDAM's structure for allocating congestion revenues will cause Wyoming ratepayers to subsidize CAISO balancing authority area ("BAA") ratepayers and provoke firm transmission customers to cancel their contracts, thereby reducing revenues that offset Wyoming rates. While the Company failed to analyze these risks in the Application, it has acknowledged their significance. For example, the Company has indicated (as discussed in greater detail below) that efforts are underway to modify the EDAM's congestion revenue structure. The Company also acknowledged through discovery (reproduced below) that the Company's intention to join the EDAM contributed to Powerex's decision to cancel a contract for 780 MW of firm transmission rights leading up to the Application's filing:

¹⁵ See Ex. 2 (Wilding Testimony) at 8:12 – 9:2.

WIEC Data Request 1.7: Please identify the (1) total amount of third-party transmission service agreements for service on PacifiCorp's transmission system, in MW, that have been cancelled as a result of PacifiCorp's plan to join the EDAM, and (2) the actual and expected revenue under those agreements in 2024, 2025, 2026, and 2027.

Response to WIEC Data Request 1.7: More than a year prior to PacifiCorp's [EDAM] participation, PowerEx informed PacifiCorp that it intended to cancel 780 megawatts (MW) of long-term (LT) point-to-point (PTP) transmission rights effective March 31, 2025, ostensibly due to PacifiCorp's stated intention to join the EDAM.¹⁶

The Application also fails to provide a detailed explanation of the relative benefits, risks, and customer rate impacts associated with joining the EDAM as compared to joining alternative day-ahead markets such as SPP Markets+ or the SPP RTO Expansion. The Application asserts "[t]he EDAM is the best option for an inclusive market in the West that will leverage the greatest possible transmission connectivity and load and resource diversity to provide cost savings to our customers, increase reliability, and reduce emissions utilizing zero-fuel cost resources available in the market."¹⁷ However, the Application does not provide data or analysis to substantiate this claim. Instead, the Application broadly attributes the Company's position to four factors: (1) the Company's confidence that the CAISO will effectively manage the EDAM based on its experience as a WEIM participant; (2) the requirement to withdraw from the WEIM prior to participating in an alternative market; (3) the proximity between the Company's and CAISO's BAAs, which presents opportunities for greater connectivity; and (4) the preference for expanding an established market rather than starting a new "greenfield" market.¹⁸ While this context is helpful to understand the Company's reasoning underlying the Application, the Application does not provide sufficient information to enable the Commission or intervenors to evaluate whether participation in the EDAM is in the best interest of Wyoming ratepayers. The

¹⁶ The Company has not yet provided a response to subpart (2) of this data request.

¹⁷ See Ex. 2 (Wilding Testimony) at 6:22 – 7:3.

¹⁸ See *id.* at 9:16-10:18.

Company's responses to discovery (reproduced below) confirm that it has not prepared a more detailed, internal analysis:

WIEC Data Request 1.11: Refer to Michael G. Wilding's direct testimony at page 9, line 19 through page 10, line 10.

(a) Please provide all analyses prepared by or for PacifiCorp comparing the governance structure of the EDAM to the governance structure of Markets+.

[...]

(c) Please provide all analyses prepared by or for PacifiCorp comparing the resource adequacy/resource sufficiency requirements of the EDAM to the resource adequacy/resource sufficiency requirements of Markets+.

(d) Please provide all analyses prepared by or for PacifiCorp comparing the market design of the EDAM to the market design of Markets+ as it relates to market power mitigation, scarcity pricing, fast-start pricing, and virtual bidding.

(e) Please provide all analyses prepared by or for PacifiCorp comparing the market design of the EDAM to the market design of Markets+ as it relates to the allocation of congestion revenues.

Response to WIEC Data Request 1.11

(a) While not prepared by or for PacifiCorp, please refer to Portland General Electric's (PGE) comparison of the [EDAM] and Markets+. ¹⁹

[...]

(c) PacifiCorp did not prepare or receive analysis comparing the resource adequacy/resource sufficiency requirements of the EDAM to that of Markets+. Markets+ utilizes the Western Resource Adequacy Program (WRAP) for its resource adequacy requirements of which the Company is a member.

(d) Please refer to the Brattle Group's comparative assessment performed for PacifiCorp of the EDAM and Markets+ design features. Also, refer to PGE's analysis referenced in the Company's response to subpart (a) above.

(e) Please refer to the Company's response to subpart (d) above.

The Company's reference in that data request response to PGE's comparison of the EDAM and Markets+ highlights the critical absence of a comparable comparison for PacifiCorp. The

¹⁹https://www.oasis.oati.com/woa/docs/PGE/PGEdocs/PGE_EDAM_and_Marketsplus_comparative_study_2024.pdf. (last accessed May 8, 2025) (citation in original).

Company's failure to perform its own thorough, comparative analysis of the fundamental differences between the EDAM and Markets+ (akin to PGE's, which is embedded in the link in Footnote 19) as part of its market-selection process is concerning given the magnitude of the impacts, for better or worse, that Wyoming ratepayers will experience if the Company proceeds with joining the EDAM. Further, the materials the Company apparently relied on to inform its decision to join the EDAM do not reflect the recent decisions by several WEIM participants to join Markets+ instead of the EDAM.²⁰

While the Order does not explicitly require a comparison of alternative markets, the absence of this analysis deprives the Commission of information that is critical to determine whether participation in the EDAM is in the best interest of Wyoming ratepayers.

In short, the absence of a risk analysis and comparative analysis of market options demonstrates that the Application does not comply with the Order's directive to "address the anticipated benefits and risks of participation in the EDAM" and "include all pertinent information that would be required by Commission Rule, Chapter 3, Section 21(f)(i)."²¹ The Application therefore fails to demonstrate that the requested relief is in the public interest, and the Commission should exercise its authority under Wyo. Stat. § 37-2-112 to stay this proceeding and order that the Company file supplemental information that includes a thorough analysis of risks associated with EDAM participation and comparison of the market options available.

²⁰ For example, on May 9, 2025, Bonneville Power Administration ("BPA") announced its decision to join Markets+ instead of the EDAM. BPA's decision was supported by a thorough analysis, highlighting the lack of support for the Company's application here. <https://www.bpa.gov/-/media/Aep/about/publications/records-of-decision/2025-rod/rod-20250509-day-ahead-market-policy.pdf>.

²¹ Order at 3, ¶ 1.

III. The Application is not ripe for a decision because material details concerning the EDAM are still being developed and the Company will suffer no hardship from withholding a decision at this time.

The Application is not ripe because (1) the determination on the merits of whether the Company's participation in the EDAM is in the public interest requires consideration of facts that are not yet developed; and (2) the Company will suffer no direct or immediate hardship from a decision staying consideration of the Application and requiring the Company to file supplemental information.²²

No fitness for decision:

The question of whether joining the EDAM is in the public interest is not fit for a decision at this time because there is uncertainty concerning the outcomes of the FERC's evaluation of the Company's revised Open Access Transmission Tariff ("OATT"), the Company's and CAISO's ongoing development of EDAM protocols, and legislation proposed in California that may fundamentally revise the EDAM's governance structure.

The FERC is actively reviewing the Company's proposed OATT revisions, which are necessary for the Company to implement the EDAM, in Docket No. ER25-951-000. The FERC proceeding's timeline is still uncertain because it is a contested matter involving issues that are not fully briefed at the time of this writing. On March 27, 2025, the FERC issued a deficiency letter ordering the Company to file an amendment addressing eight sets of issues. The Company filed its response on April 28, 2025, and comments on the response were due May 19, 2025, so it is unlikely the FERC will issue a decision before the Hearing scheduled for this case on July 9, 2025. At the same time, the Company and CAISO are actively conducting a stakeholder

²² See *Gonzales*, 64 F.3d at 1499 (a request is not fit for a decision if determination on the merits requires facts that are not sufficiently developed; a party does not suffer hardship unless a decision causes it to suffer a direct or immediate dilemma).

engagement process to modify the EDAM design, as indicated in the Company’s discovery response (reproduced below):

WIEC Data Request 1.6: Is PacifiCorp aware of any potential modifications to the EDAM design in response to issues raised through the protests in Docket No. ER25-951-000? Please explain your answer in detail.

Response to WIEC Data Request 1.6: Yes, the [CAISO] is currently conducting a stakeholder process to enhance the congestion revenue allocation design of the [EDAM].²³ The CAISO launched the initiative as a response to concerns raised in [FERC] Docket No. ER25-951-000 that contended that EDAM Entities would not receive sufficient congestion revenue from the CAISO to give long-term transmission rights holders a financial hedge against price differences between their generation resources and load. The CAISO held two workshops and published an issue paper and a recently proposed a design in a Draft Final Proposal.²⁴

Further, California Senate Bill 540 (“SB 540”),²⁵ which is part of the “Pathways Initiative,” would restructure the EDAM by shifting market governance responsibilities from the CAISO to an independent regional operator (“RO”). SB 540 was amended and re-referred to a senate committee on May 1, 2025, and the amendments were considered at a committee hearing scheduled May 19, 2025. While the timeline for a final decision on the bill is also uncertain, the general session’s deadline to pass legislation is September 12, 2025. If passed in its current form, this bill would modify a fundamental element of the EDAM’s governance structure.

In short, the Application is not ripe for a decision because facts concerning the final form of the EDAM will not be known until the foregoing issues are resolved.

No direct or immediate dilemma from a stay:

Setting aside the fact that the EDAM framework is still evolving, the Company will suffer no direct or immediate dilemma from a decision staying consideration of the Application

²³ <https://stakeholdercenter.caiso.com/RecurringStakeholderProcesses/Extended-day-ahead-market>. (citation in original) (last accessed May 15, 2025).

²⁴ See <https://stakeholdercenter.caiso.com/InitiativeDocuments/Draft-Final-Proposal-EDAM-Congestion-Revenue-Allocation-April-16-2025.pdf>. (citation in original) (last accessed May 15, 2025).

²⁵ https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202520260SB540. (last accessed May 15, 2025).

and requiring the Company to file supplemental information because “EDAM participation is voluntary” and the Company may join the market at a later date if and when the facts demonstrate that participation is in the public interest.²⁶ The Company’s preference for joining the EDAM as a first participant does not constitute a direct or immediate dilemma. However, a decision approving the Company’s intention to join the EDAM based upon the incomplete information available at this time could impose hardship upon the Company’s ratepayers, whose electricity bills would be impacted, for better or worse, based on such a decision.

Thus, uncertainty concerning the EDAM’s final structure prevents the Commission and intervenors from conducting the thorough analysis necessary to evaluate whether joining the EDAM is in the public interest, and the Company will suffer no direct or immediate dilemma from a decision declining to address the Application until more information is available. The Commission should therefore stay this proceeding until the Application is ripe for a decision and require the Company to file supplemental information on the status of the FERC’s evaluation of the Company’s revised OATT, the Company’s and the CAISO’s ongoing development of EDAM protocol modifications, and California SB 540 as this information becomes available.

MOTION FOR SHORTENED RESPONSE TIME

The Scheduling Order in this proceeding established an accelerated process for consideration of the Application, with intervenor testimony due on June 17 and the public hearing set to commence on July 9. Under Commission Rule Chapter 2, Section 13(a), responses to this motion would be due in 20 days, with a reply due within 15 days after service of the response. In light of the upcoming deadlines for this proceeding and the nature of the relief requested in this motion, WIEC requests that the Commission shorten the deadline for a response

²⁶ Application at 6, ¶ 7(e); *id.* at 5, ¶ 7(a); *see also* Ex. 2 (Wilding Testimony) at 8:12–9:2 and 10:11–18.

to 10 days and the deadline for a reply to 5 days. In the alternative, WIEC requests that the Commission toll the upcoming deadlines while this motion is under consideration.

CONCLUSION

Based on the foregoing, WIEC respectfully requests that the Commission issue a decision:

1. Shortening response time to this Motion or tolling the procedural schedule;
2. Staying this proceeding;
3. Requiring the Company to amend the Application to comply with the Commission's prior directive to seek its authorization to join the EDAM;
4. Requiring the Company to file supplemental information and analysis as follows:
 - a. The legal and factual basis for the Company's assertion that participation in the EDAM does not constitute "a change in control of utility property or otherwise require[] the express approval of the Commission"²⁷;
 - b. The anticipated risks to Wyoming ratepayers associated with joining the EDAM, including the risks associated with the allocation of congestion revenues and of firm transmission holders cancelling their firm transmission contracts;
 - c. An analysis comparing the anticipated benefits and risks of participation in the EDAM to those of other regional markets (e.g., Markets+) and assessing the factors provided in Commission Rule, Chapter 3, Section 21(f)(i); and
 - d. Status updates concerning the FERC's evaluation of the Company's revised OATT, the Company's and the CAISO's ongoing development of EDAM protocol modifications, and California SB 540; and
5. Vacating the Scheduling Order.

²⁷ Application at 3, ¶ 5 n.2.

Respectfully submitted on May 21, 2025.

HOLLAND & HART LLP

By: s/ Thorvald A. Nelson

Thorvald A. Nelson, #8-6796

Nikolas S. Stoffel, #7-5484

Austin W. Jensen, #8-7251

William F. Prioleau (*pro hac vice forthcoming*)

Holland & Hart LLP

555 Seventeenth Street, Suite 3200

Denver, CO 80202

Telephone: (303) 295-8000

tnelson@hollandhart.com

nsstoffel@hollandhart.com

awjensen@hollandhart.com

wfprioleau@hollandhart.com

ATTORNEYS FOR WIEC

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of May, 2025 the **WYOMING INDUSTRIAL ENERGY CONSUMERS' MOTION TO STAY PROCEEDING AND REQUIRE SUPPLEMENTAL INFORMATION AND MOTION FOR SHORTENED RESPONSE TIME** was e-filed with the Wyoming Public Service Commission and a true and correct copy was sent via electronic mail addressed to the following:

Stacy Splittstoesser
Wyoming Regulatory Affairs Manager
Rocky Mountain Power
315 West 27th Street
Cheyenne, WY 82001
stacy.splittstoesser@pacificorp.com

Ajay Kumar
Assistant General Counsel
Rocky Mountain Power
825 NE Multnomah, Suite 2000
Portland, OR 97232
ajay.kumar@pacificorp.com

Adam Lowney
Bill Magness
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
Portland, OR 97205
adam@mrg-law.com
bill@mrg-law.com

Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232
datarequest@pacificorp.com

*Thorvald A. Nelson
*Nikolas S. Stoffel
*Austin W. Jensen
*William F. Prioleau
Holland & Hart LLP
555 Seventeenth Street, Suite 3200
Denver, CO 80202
tnelson@hollandhart.com
nsstoffel@hollandhart.com
awjensen@hollandhart.com
wfprioleau@hollandhart.com
*aclee@hollandhart.com
*tlfriel@hollandhart.com

Shelby M. Hayes Hamilton
Wyoming Office of Consumer Advocate
2515 Warren Avenue, Suite 304
Cheyenne, WY 82002
shelby.hamilton1@wyo.gov

Chris Leger
Ben Fitch-Fleischmann, PhD
3433 Ranch View Drive
Cheyenne, WY 82001
chris@interwest.org
ben@interwest.org

s/ Adele Lee _____