

Exh. RG-4  
Docket UE-210829  
Witness: Rohini Ghosh

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba  
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-210829

**PACIFICORP**

**EXHIBIT OF ROHINI GHOSH**

**Select Party Responses to PacifiCorp Data Requests**

**September 2024**

**Exhibit RG-4 – Select Party Responses to PacifiCorp Data Requests**

**I. Commission Staff DRs**

**DATA REQUEST NO. 1:**

Please confirm that the Company correctly applied the Washington Inter-Jurisdictional Allocation Methodology (WIJAM) in the Clean Energy Implementation Plan (CEIP) Update when estimating interim targets. If anything other than an unconditional yes, please explain how the Company did not correctly apply the WIJAM.

**STAFF RESPONSE:**

Based on the language it is unclear which CEIP this question refers to. For the purpose of this response, Staff assumes the question is referring to the Biennial CEIP update, filed on November 1, 2023, to the 2021 Revised CEIP. Based on that assumption, Staff confirms that the Company used allocation percentages from WIJAM in the BCEIP update, filed November 1, 2023.

**DATA REQUEST NO. 4:**

Does Staff agree that the Company correctly incorporated all procured resources from the 2020 All-Source Request for Proposals (2020AS RFP) in the CEIP Update when estimating interim targets? If anything other than an unconditional yes, please explain how the Company did not correctly incorporate these resources.

**STAFF RESPONSE:**

Staff assumes the Company means the Biennial CEIP update, when referring to CEIP Update, with that assumption, yes.

**DATA REQUEST NO. 6:**

Please confirm that Staff's testimony did not analyze the modeling that supported PacifiCorp's interim targets. If Staff's answer is anything other than an unconditional yes, please explain and cite where Staff's testimony analyzes PacifiCorp's modeling that supported PacifiCorp's interim targets.

**STAFF RESPONSE:**

Staff did not directly discuss the modeling analysis supporting PacifiCorp's interim targets. However, Staff reviewed the modeling work papers and had meetings with PacifiCorp's team on December 5, 2023, and December 12, 2023, where the Company walked Staff through the renewable allocations for the 2021 CEIP and the 2021 BCEIP. Although Staff's testimony does not call out PacifiCorp's modeling process, Staff analyzed the core reasons for the Company's interim target reduction, which included the difference in allocation of renewables. Staff particularly looked at the percentages of renewable shares between the revised 2021 CEIP and

the 2023 BCEIP filing to help inform how the allocation methodology adjustment reduced the interim targets.

**DATA REQUEST NO. 19:**

Interim Targets. PacifiCorp understands that Staff’s recommended 73 percent interim target for 2029 is based on PacifiCorp’s 2021 Revised CEIP, which was based on analyses from the 2021 IRP. JNS-1HCT, at 25. PacifiCorp also understands that Staff’s primary recommendation is to reject the CEIP Update, and require PacifiCorp to meet the 2021 Revised CEIP interim targets.

- a. Given that PacifiCorp has filed both its 2023 IRP and 2023 IRP Update, does Staff agree that analyses from the 2021 IRP and 2021 Revised CEIP no longer reflects PacifiCorp’s least-cost, least-risk, planning or analysis?

**RESPONSE: Please see the answers provided below:**

- a. Staff requested clarification on the term “least-cost, least-risk planning” and received response from Company counsel Zachary Rogala referencing WAC 480-100-640(f) and (f)(i), and WAC 480-100-640(6)(d) and (e). Referring to RCW 19.405.050(3)(a) Staff would like to highlight that CETA calls for meeting the standards at the “lowest *reasonable* cost, considering risk”. Neither CETA nor the resource planning statute use the term “least-cost, least-risk planning.” Staff is assuming that this is a term used in general resource planning by the Company and not meant to convey a standard different from that outlined in the statute and Commission-issued rules. With this assumption, Staff acknowledges that the 2023 IRP and 2023 IRP Update provide more recent data and updated assumptions, which reflect current market conditions and technological advancements that differ from those in 2020 and 2021. However, the 2021 IRP and 2021 Revised CEIP provide germane historical context as well as an understanding of previous planning assumptions. Additionally, the Company revised its 2021 CEIP on March 13, 2023, and settled with all parties on October 25, 2023.

**II. Public Counsel DRs**

**DATA REQUEST NO. 02:**

Public Counsel Witness Earle states that PacifiCorp has continued its tradition of failing to plan for Washington with its BCEIP filing. You state that changes in load “would not matter if the Company treated Washington . . . as a special case in planning.” RLE-1T, at 17.

- a. Please confirm that your testimony did not analyze, nor identify any errors, with the Company’s retail load assumptions in its Biennial CEIP.

**RESPONSE:**

- a. Confirmed, though the contention cited by PacifiCorp does not absolve it from its ability and duty to procure situs resources as needed.

### **III. RNW-NWEC DRs**

#### **DATA REQUEST NO. 21:**

Please confirm that the Company correctly applied the WIJAM in the CEIP Update. If anything other than an unconditional yes, please explain how the Company did not do so.

#### **RESPONSE:**

Renewable Northwest has not undertaken this analysis.

#### **DATA REQUEST NO. 22:**

Please confirm that relying on WIJAM lowers the Company's interim targets compared to the allocation assumptions in the 2021 Revised CEIP.

#### **RESPONSE:**

This is stated in the Biennial Update.