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## WESTERN ENVIRONMENTAL LAW CENTER

October 7, 2024

### Via Electronic Mail

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Re: Docket UE-210829  
RNW and NVEC Responses to PacifiCorp's Second Set of Data Requests

Enclosed, please find Renewable Northwest's ("RNW") and the NW Energy Coalition's ("NVEC") responses to the Data Requests 34-37 submitted by PacifiCorp, dba Pacific Power & Light Company ("PacifiCorp"), in this proceeding.

Please do not hesitate to contact me with any questions.

Sincerely,

/s/ Melissa Hornbein  
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*Attorneys for NW Energy Coalition and  
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**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

Complainant,

v.

DOCKET UE-210829

PACIFICORP D/B/A

PACIFIC POWER & LIGHT COMPANY,

Respondent.

**RENEWABLE NORTHWEST'S & NW ENERGY COALITION'S RESPONSES TO  
DATA REQUESTS 34 - 37 BY PACIFICORP**

Dated: October 7, 2024

34. Please list all proceedings, including docket number(s) and relevant order number(s), that you are aware of where a state utility commission, without any request to do so by a utility, has ordered a utility to issue a request for proposal for resources similar to your recommended remedy in KW-1T at 22.

RNW is not aware of any proceedings in which a state utility commission ordered a utility to issue a request for proposals absent a request by the utility. However, in the case of this proceeding in which the Commission is setting the precedent for utility compliance and necessary remedies in the implementation of a still novel statutory scheme, it is RNW's position that the Commission has authority under the Clean Energy Transformation Act to utilize any remedies it determines are available—including an order to issue an RFP—to ensure compliance with statutory deadlines.

Prepared by: Katie Ware

35. Please list all proceedings, including docket number(s) and relevant order number(s), that you are aware of where a state utility commission, without any request to do so by a utility, has ordered a utility to issue a request for proposal for resources in any form.

Please see response to data request 34.

Prepared by: Katie Ware

36. Please list all proceedings, including docket number(s), where RNW-NWEC has recommended a state utility commission, without any request to do so by a utility, order a utility to issue a request for proposal for resources similar to your recommended remedy in KW-1T at 22.

Please see response to data request 34.

Prepared by: Katie Ware

37. Please list all proceedings, including docket number(s), where RNW-NWEC has recommended a state utility commission, without any request to do so by a utility, order a utility to issue a request for proposal for resources in any form.

Please see response to data request 34.

Prepared by: Katie Ware