

Exh. MDM-3  
Docket UE-210829  
Witness: Matthew D. McVee

**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 MATTHEW D. MCVEE**

**Select Party Responses to PacifiCorp Data Requests**

**September 2024**

**Exhibit MDM-3 – 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. 2:**

Please confirm that, consistent with the partial multiparty settlement reached in the Company's 2023 general rate case (Consolidated Dockets UE-230172 and UE-210852), the Company's analyses in the CEIP Update correctly assume that: (1) Washington continues to receive electricity from coal-fueled resources through the end of 2025 (this includes electricity from Colstrip Unit 4, and Jim Bridger Units 3 and 4); (2) that Washington continues to receive electricity from Jim Bridger Units 1 and 2 through 2029 after both are converted to run on natural gas in 2024; and (3) that Washington retains a system-allocated share of Chehalis and Hermiston natural gas-fired plants. If anything other than an unconditional yes, please explain how the Company did not correctly incorporate these assumptions.

**STAFF RESPONSE:**

Please see Staff Comments filed in Docket No. UE-210829 on January 11, 2024, at 5, Table 1.

**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. 5:**

Please explain where Staff believes PacifiCorp's interim targets are not supported by least-cost, least-risk planning processes and Washington law.

**STAFF RESPONSE:**

Staff is unclear whether PacifiCorp refers to interim targets as their new proposed targets or the targets approved and ordered by the Commission. Staff will assume that the question relates to the revised targets filed in PacifiCorp's BCEIP update. Additionally, 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 that said, Staff has not asserted that the revised interim targets violate this specific part of RCW 19.405.050(3)(a).

**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. 18:**

Resource acquisitions. It appears that Staff's proposed condition 5 would prevent PacifiCorp from "canceling, suspending, or terminating" any RFP that would be issued if supported by the 2025 Integrated Resource Plan (IRP) or CEIP. With that understanding, please provide additional detail on the following:

- a. Is Staff recommending the Commission direct PacifiCorp to issue an RFP, or rather, only issue an RFP if supported by the 2025 IRP or CEIP?
- b. If Staff is recommending the Commission direct PacifiCorp to issue an RFP, is Staff

recommending PacifiCorp issue a state-specific, or system-wide RFP?

- c. Would PacifiCorp be required to procure resources from this future RFP (Commission ordered or not)? If not, what is the purpose of issuing an RFP and not being able to cancel, suspend, or terminate it?

**STAFF RESPONSE:**

- a. Staff recommends that the Company follow WAC 480-107-009(2) and issue an all-source RFP if the Company's 2025 IRP demonstrates a resource need within four years.
- b. Staff does not make a recommendation as to whether PacifiCorp should issue state-specific or system-wide resources.
- c. PacifiCorp would not be required to procure resources from this future RFP, though if the Company's IRP identified a resource need, it would stand to reason the Company would complete said procurement.

**II. RNW-NWEC DRs**

**DATA REQUEST NO. 33(a):**

Would PacifiCorp be required to procure resources from this future RFP?

**RESPONSE:**

This is outside the scope of our recommendation.