Exhibit MMD-__X (10) will be supplemented when response to Staff Data Request No. 61 is received.

GENERAL INSTRUCTIONS FOR DISCOVERY

Please provide all electronic documents and data in native format. Please review all Excel documents and workpapers for hidden cells. Hidden cells include hidden worksheets, columns, rows, and ranges. Please ensure that all items provided pursuant to these requests do not contain any hidden cells or formulas.

TO: Daniel MacNeil
FROM: Jaclynn Simmons

UTC STAFF DATA REQUEST NO. 59:

In response to Staff Data Request 54, the Company stated, "the cost adders for the 2022 ASRFP are as follows:

Solar: 34.47 percent
Wind: 27.31 percent
Battery storage: 5.06 percent"

For the calculation of these cost adders, please refer to Attachment WUTC 54-1 (for solar) and Confidential Attachment WUTC 54-2 (for wind and storage)."

a. Did the Company remove the adders in future years, or just reduce them?
b. Did the Company do any additional outreach for how other utilities were handling the increased costs within their IRPs?
c. It seems that renewable generating resources got major adders while the battery storage cost adder was only 5 %. Please explain why and supply the data that supports the increased adders for each item; solar, wind, and battery storage.

UTC STAFF DATA REQUEST NO. 60:

In follow-up to Staff Data Request 52, Staff asked, "Please explain why the Company responded to Staff in Staff Data Request 18 with '[r]ather, executing power purchase agreements (PPA) at the conclusion of an RFP may impact the Company's credit rating,' but said the above statement to Oregon Public Utility Commission (OPUC) Commissioners?"

The Company's response was, "Please refer to the Company's response to subpart (e) above." Subpart (e) states, "As discussed in the Company's response to subpart (a) above, PPAs are the most beneficial because they have smaller impacts on credit constraints and metrics, but the imputed debt associated with PPAs may still negatively impact the Company's credit rating." (internal quotations omitted)

Again, why did the Company tell the Oregon Commission that "...[Power Purchase Agreements](PPAs) would be most beneficial to our constraints and metrics that we have to meet." Rick Link adds that the Company can do PPAs at the "the right level." However, told the

UTC that "[r]ather, executing power purchase agreements (PPA) at the conclusion of an RFP may impact the Company's credit rating."

a. Why is there a difference between what the Company told OPUC and what the Company told UTC? Please state the factual basis for why these answers differ.
b. If PPA's are most beneficial to the Company's constraints and metrics, why did the Company cancel the 2022 ASRFP, when the Company knew it needed those identified resources? Moreover, why did the Company not enter into a PPA if they are the "most beneficial to [its] constraints and metrics?"
c. Did the Company consider entering into a PPA for a co-located solar and storage system? If it did and chose not to, please explain the basis for not entering into a PPA.
d. Additionally, how long does the Company anticipate it would take to increase the grade reported by the credit agencies?
e. Hypothetically, if it takes five years to increase its credit metric by one grade, please explain how the Company will be CETA compliant by 2030 if procuring resources is limited due to financial constraints?
f. At what grade would the Company be willing to engage in renewable and non-emitting resource procurement?
g. Referring to the Company's answer in subpart (f) above, if it takes five years to increase PacifiCorp's credit metric to that grade, please explain how the Company will comply with CETA by the 2030 deadline if it limits resource procurement on the basis of financial constraints.

TO: Matt McVee

UTC STAFF DATA REQUEST NO. 61:

In response to Staff Data Request 57, the Company responded with, "where the Commission approved several PacifiCorp rate proposals, that are similarly reflected in the CEIP Biennial Update."

a. Does the Company believe that the Commission approval of rate proposals is an approval of the reduction of interim targets?
b. Does the Company believe that approval of rate proposals excuse it from not procuring renewable and non-emitting energy to meet the needs of the Company's obligations for CETA?

UTC STAFF DATA REQUEST NO. 62:

Following up on Staff Data Request 58, does the Company agree that the order in UE-230172 was issued approximately five months after the biennial update was filed and approximately one year after the 2023 IRP Progress Report was filed?

UTC STAFF DATA REQUEST NO. 63:

In testimony, Mr. McVee states "[i]ndeed, the Commission has already approved several of the adjustments in the CEIP Biennial Update in other proceedings." MDM-2T at 5:10-11. Please explain with particularity, the factual basis for this statement, including, but not limited to, all citations, including page number and paragraph number, to the orders upon which you base this factual assertion.

TO: Adam Kennedy

UTC STAFF DATA REQUEST NO. 64:

Following up on Staff Data Request 55:

a. Please explain the scenario risks:
   1. Are these just financial risks?
   2. What is included in these risks?

b. Subpart d states, "The term 'least-risk' refers to a combination of the calculated financial risk adjustment related to the Monte Carlo simulation, and historically in some instances, the use of judgement about the practicality of a portfolio as informed by scenario risks. In cases where a higher-cost portfolio has been selected as the preferred portfolio, the cost difference has been small which is explained in the relevant IRP portfolio analysis in the IRP."
   1. What does the Company mean by "judgement as informed by scenario risks?"
   2. Would these risks from the scenarios already be included into the preferred portfolio?

c. Subpart g states, "In work papers supporting the 2023 IRP, the measurement of risk is included in all MT reports on tab "Costs by Sample." The risk-adjustment PVRR is added to the non-risk-adjusted PVRR to calculate a final risk-adjusted PVRR. If the non-risk-adjusted portfolio PVRR is sufficiently low, it may overcome a higher risk-adjustments when compared to other portfolios on a final risk-adjusted basis."
   1. So the risk-adjusted PVRR is added to the non-risk adjusted PVRR and this gives you the final total risk-adjusted PVRR. Please show the formula for this calculation.
   2. Provide the workpaper file and where to see this formula for this calculation within that file. If the file has been previously provided, please provide the exact file name and how to navigate to the formula in that workpaper.
   3. Does this mean that the Company calculates its PVRR for base (non-risk-adjusted) then calculates the PVRR for BASE w/Risk, then those add together?
   4. If so, does the Company see this as a double count of PVRR?

TO: Dan MacNeil and Matt McVee

UTC STAFF DATA REQUEST NO. 65:

In response to Staff Data Request 6, PacifiCorp supplied an S&P credit rating for the Company dated June 30, 2023. The S&P report supplied stated, "We also revised the outlook on PacifiCorp to negative from stable."

a. What are the current credit ratings of the Company one year after the downgrade?
b. If in June the Company was in stable condition, how does this affect its ability to procure resources?

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