

WUTC Data Request 2

PacifiCorp BCEIP Team - On January 8, 2024, at 4:46 PM Staff analyst Jaclynn Simmons emailed Stephanie Meeks, Ariel Son, and Rohini Ghosh asking the Company to verify that the below statement was correct, or to offer changes if appropriate:

In the 2021 CEIP, the Company assumed a new method of allocating interstate resources to Washington, called the Multi-State Protocol (MSP) and thought it would have been approved by the time of the CEIP's approval. The Company was eager to use the new methodology and used it in the 2021 CEIP, in hopes it would have been approved. When asked about it they argued that the new methodology was a more reasonable scenario than the old approved Western Interconnection Jurisdiction Allocation Methodology (WIJAM). To date, however, the new allocation methodology has not been approved, so the IRP progress report and Biennial Update have reverted to using the old WIJAM.

The company responded that:

In the 2021 CEIP, the Company had included an assumption that realignment of gas resources, specifically allocating all of the Chehalis natural gas power plant to Washington through a successor allocation methodology to the Washington Inter-Jurisdictional Allocation Methodology (WIJAM), would be approved by the time of the CEIP's approval. This timeline was consistent with the sunset date for the 2020 Inter-Jurisdictional Cost Allocation Protocol, which is the allocation methodology used for all of PacifiCorp's other states. However, as negotiations on a successor agreement progressed, circumstances changed, and additional time was necessary to develop a successor to these cost allocation methodologies, and extensions of the 2020 Protocol have been approved in the Company's other states. As a result, the IRP progress report and Biennial Update have reverted to using the only currently-approved allocation methodology in Washington: WIJAM.

Please confirm that response reflects PacifiCorp's current position. If it does not, please provide an updated response that sets out PacifiCorp's current position.

Response to WUTC Data Request 2

Yes. PacifiCorp's previous statement as described above regarding assumptions made in past Clean Energy Implementation Plan (CEIP) filings with the Washington Utilities and Transportation Commission (WUTC) has not changed.

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