WUTC Data Request 27

In the same article referenced above, Warren Buffet is quoted, stating, "we're not going to throw good money after bad" and CEO of Berkshire Hathaway Energy, Greg Abel, added "legislative and regulatory reform is needed in states where PacifiCorp does business 'if we're going to deploy incremental capital".

- (a) Does PacifiCorp plan to forego resource acquisitions? If so, for what time period?
- (b) If PacifiCorp identifies a resource need in its IRP or other planning process, will it choose to forgo acquiring the resource until "legislative and regulatory reform" is achieved?
- (c) How does PacifiCorp define "legislative and regulatory reform" in this context?
- (d) Does PacifiCorp plan to comply with the statutory deadlines in CETA?

Response to WUTC Data Request 27

PacifiCorp objects to this data request on the grounds that it seeks information that is not relevant, that is beyond the scope of this proceeding, and because the request is not reasonably calculated to lead to the discovery of admissible evidence. PacifiCorp further objects to this data request to the extent it calls for speculation. PacifiCorp further objects to this request to the extent that it seeks information that is not within the Company's possession. The request asks PacifiCorp to draw inferences from statements of individuals that are not PacifiCorp employees or agents, and apply those inferences to PacifiCorp operations. Subject to and without waiving the foregoing objections, the Company responds as follows:

PacifiCorp assumes that the "same article referenced above" refers to the excerpt attached to WUTC Data Request 26. Based on the foregoing assumption, PacifiCorp reiterates its concerns that the document provided does not include a source or other requirement information on which it can be validated.

- (a) PacifiCorp has not foregone resource acquisitions. Please refer to PacifiCorp's response to WUTC Data Request 9 and to the direct testimony filed with the Washington Utilities and Transportation Commission (WUTC) on June 17, 2024.
- (b) Please refer to the Company's response to subpart (a) above.
- (c) PacifiCorp objects to this data request on the grounds that it seeks information that is not relevant, that is beyond the scope of this proceeding, and because the request is not reasonably calculated to lead to the discovery of admissible evidence. PacifiCorp further objects to this data request to the extent it calls for speculation. PacifiCorp

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

further objects to this request to the extent that it seeks information that is not within the Company's possession. The request asks PacifiCorp to draw inferences from individuals that are not PacifiCorp employees or agents, and apply those inferences to PacifiCorp operations.

(d) PacifiCorp assumes that the statutory deadlines in the Clean Energy Transformation Act (CETA) referenced in the question refers to the mandates for non-emitting and renewable resources in 2030 and 2045. Based on the foregoing assumption, the Company responds as follows:

Yes, subject to the other statutory considerations in CETA (e.g., reliability and cost considerations).

PREPARER: Matt McVee SPONSOR: Matt McVee

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