

WUTC Data Request 35

For CETA compliance, does the Company's modeling include using alternative compliance in 2030 as described in WAC 480-100-640(9) and RCW 19.405.040(1)(b)?

- (a) If so, please supply the excel sheet that shows this modeling and provide the page and document where the narrative for this modeling is located.
- (b) Is the Company relying on alternative compliance measures instead of procuring more renewable resources?

Response to WUTC Data Request 35

- (a) Yes, PacifiCorp's modeling of its Clean Energy Transformation Act (CETA) compliance position for 2030-2044 includes the potential for using alternative compliance for up to 20 percent of its compliance obligation. The most recent analysis of PacifiCorp's expected interim clean energy targets and progress towards CETA compliance is available as part of the 2023 Biennial Clean Energy Implementation Plan (CEIP) Update filed with the Washington Utilities and Transportation Commission (WUTC) on November 1, 2023 in docket UE-210829.

Please also refer to page 10 of PacifiCorp's 2023 Biennial CEIP Update for a mention of how the Company uses alternative compliance to comply with the greenhouse gas (GHG) neutral standard in 2030 and 2031.

For specifics on how the 20 percent alternative compliance is accounted for in the accounting, please refer to the supporting work papers filed with the Washington Utilities and Transportation Commission (WUTC) on November 1, 2023, specifically file "210829-PAC-CEIP-Biennial-Rpt-WP-Interim-Targets-1128-23.xlsx". On tab "WA CETA Summary" row 13, "Alt Compliance" includes the mathematical logic that accounts for up to 20 percent compliance that can, in addition to the generated CETA-compliant energy (shown in row 9), can help the Company reach the final compliance position in each year as shown in row 14.

- (b) No, PacifiCorp continues to pursue procurement of CETA-compliant resources, as discussed in the Company's testimony in this proceeding and the recent general rate case (GRC). PacifiCorp will, however, rely on alternative compliance for 20 percent or less of Washington load starting in 2030, as contemplated under CETA. This is important to avoid rate pressure due to unnecessarily advancing procurement and reliability issues associated with reliance on renewable energy for 100 percent of Washington load given the current state of generation technology.

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