

UE-210829 / PacifiCorp  
October 8, 2024  
CRITFC Data Request 1.1

### **CRITFC Data Request 1.1**

**General** – Does PacifiCorp agree that the Yakama Nation’s governing authority is its Tribal Council? If not, please explain PacifiCorp’s understanding of the Yakama Nation’s governance structure.

### **Response to CRITFC Data Request 1.1**

PacifiCorp understands that Tribal nations are sovereign nations within the United States (U.S.), and they have the authority to govern themselves. The Yakama Nation’s established governing body is its Tribal Council.

PREPARER: Matthew McVee

SPONSOR: Matthew McVee

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.

## **CRITFC Data Request 1.2**

**General** – Please state whether PacifiCorp met with the Yakama Nation’s Tribal Council between the period beginning July 2021 and ending September 2024 for the purpose of discussing the physical condition of residential structures occupied or otherwise used as a residence by PacifiCorp’s residential and metered customers located within the exterior boundaries of the Yakama Indian Reservation.

- (a) If PacifiCorp met with the Tribal Council during the stated period and for the purpose noted herein this DR, please provide the date(s) of all such meetings, the individuals from both PacifiCorp and the Yakama Nation that were in attendance, any notes or minutes created by PacifiCorp as a result of such meetings, and any outcome(s) or agreements reached during such meetings.

## **Response to CRITFC Data Request 1.2**

PacifiCorp has not met with the Yakama Nation’s Tribal Council between the period beginning July 2021 and ending September 2024 for the purpose of discussing the physical condition of residential structures occupied or otherwise used as a residence by PacifiCorp’s residential and metered customers located within the exterior boundaries of the Yakama Indian Reservation. The Company welcomes the opportunity to hold space and time for such discussions in the future, especially if it is a priority for the Yakama Nation. PacifiCorp remains mindful of tribal governance and structures and understands that a formal request (whether in person or in writing) must first be provided to set up a meeting with any Tribal Council.

PREPARER: Matthew McVee

SPONSOR: Matthew McVee

### CRITFC Data Request 1.3

**General** – Please state whether PacifiCorp met with employees or representatives of the Yakama Nation between the period beginning July 2021 and ending September 2024 for the specific purpose of discussing the physical condition of residential structures occupied or otherwise used as a residence by PacifiCorp’s residential and metered customers located within the exterior boundaries of the Yakama Indian Reservation.

- (a) If PacifiCorp met with employees or representatives of the Yakama Nation during the stated period and for the purpose noted herein this DR, please provide the date(s) of all such meetings, the individuals from both PacifiCorp and the Yakama Nation that were in attendance, any notes or minutes created by PacifiCorp as a result of such meetings, and any outcome(s) or agreements reached during such meetings.

### Response to CRITFC Data Request 1.3

Please refer to Attachment CRITFC 1.3 which provides the following documents:

- PacifiCorp May 2022 Equity Advisory Group One-on-One Meeting Questions
- PacifiCorp\_Take\_Aways\_from\_May\_2022\_Meetings\_with\_EAG\_Organizations
- PacifiCorp's May 2022 WA EAG One-on-One Meeting Schedule

On May 24, 2022, PacifiCorp met with Ray Wiseman (General Manager of Yakama Power) to discuss community challenges and energy related topics. Discussed where topics such as affordable housing, housing infrastructure, transportation access, workforce development, outreach, communications, and energy efficiency (EE) among other items. Please refer to file “PacifiCorp\_Take\_Aways\_from\_May\_2022\_Meetings\_with\_EAG\_Organizations”. The May 24, 2022 meeting was part of a larger endeavor by PacifiCorp to meet with representatives of its Washington Equity Advisory Group (EAG) with the goal of meeting community where they are. PacifiCorp scheduled one-on-one meetings with its EAG and member organizations to better understand the lived experiences and challenges faced by each community represented. Please refer to file “PacifiCorp's May 2022 WA EAG One-on-One Meeting Schedule”. The above referenced meetings also provided the space to begin to explore opportunity areas among community representatives and PacifiCorp.

The following PacifiCorp employees attended the one-on-one meetings: Kimberly Alejandro, Equity Advisory Analyst, Jackie Wetzsteon, Environmental Program Manager, Cory Scott, Vice President of Customer and Community Solutions, Toni McLavey, Regional Business Manager, and Selena Bermudez, Communications Representative. Scheduled meetings were not intended to reach an agreement on any specific issue or topic, but as shown in file “PacifiCorp May 2022 Equity Advisory

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Group One-on-One Meeting Questions”, served as an opportunity to listen and better understand the energy and non-energy challenges faced by communities.

PREPARER: Kimberly Alejandro

SPONSOR: Rohini Ghosh

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#### **CRITFC Data Request 1.4**

**General** – Please state whether PacifiCorp met with representatives of the Yakama Nation between the period beginning July 2021 and ending September 2024 for the purpose of discussing the physical condition of heating and cooling equipment, water heaters, cooking and refrigeration equipment, and water delivery systems within or appurtenant to residential structures occupied or otherwise used as a residence by PacifiCorp’s residential and metered customers located within the exterior boundaries of the Yakama Indian Reservation.

- (a) If PacifiCorp met with employees or representatives of the Yakama Nation during the stated period and for the purpose noted herein this DR, please provide the date(s) of all such meetings, the individuals from both PacifiCorp and the Yakama Nation that were in attendance, any notes or minutes created by PacifiCorp as a result of such meetings, and any outcome(s) or agreements reached during such meetings.

#### **Response to CRITFC Data Request 1.4**

PacifiCorp has not met with representatives of the Yakama Nation between the period beginning July 2021 and ending September 2024 for the purpose of discussing the physical condition of heating and cooling equipment, water heaters, cooking and refrigeration equipment, and water delivery systems within or appurtenant to residential structures occupied or otherwise used as a residence by PacifiCorp’s residential and metered customers located within the exterior boundaries of the Yakama Indian Reservation. The Company welcomes the opportunity to hold space and time for such discussions in the future, especially if it is a priority for the Yakama Nation.

PREPARER: Matthew McVee

SPONSOR: Matthew McVee

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### **CRITFC Data Request 1.5**

**General** – Between the period beginning July 2021 and ending September 2024, please state the total amount of conservation dollars collected in rates from PacifiCorp’s customers located in Yakima County, WA.

### **Response to CRITFC Data Request 1.5**

For purposes of this data request, PacifiCorp interprets “conservation dollars collected in rates” as “Schedule 191 (System Benefits Charge Adjustment) collections”. Based on the foregoing interpretation, the Company responds as follows:

Between July 2021 and September 2024, PacifiCorp booked \$40,075,826 in Schedule 191 collections from Yakima County customers.

PREPARER: André Lipinski

SPONSOR: Clay Monroe

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.

## **CRITFC Data Request 1.6**

**General** – Between the period beginning July 2021 and ending September 2024, please state the total amount of conservation dollars provided to PacifiCorp’s customers located in Yakima County, WA, for the purpose of funding the Company’s conservation program’s rebates, discounts, or other monetary benefits used to support its energy efficiency programs.

### **Response to CRITFC Data Request 1.6**

For Home Energy Savings, Low Income Weatherization and Wattsmart Business energy efficiency (EE) projects completed July 2021 through September 2024, a total of approximately \$23.8 million was provided for customer sites located in Yakima County, Washington.

This total includes customer incentives, partner/vendor incentives, and direct installation costs since these are tracked by customer location in most cases. It does not include expenditures that are not tracked by customer location such as program implementation, marketing, internal labor costs, energy engineering provided for business customer projects, some customer incentives, etc.

Projects are included based on the savings reporting date, which determines the calendar year for savings reporting for the demand-side management (DSM) Annual Report.

PREPARER: Nancy Goddard

SPONSOR: Clay Monroe

## **CRITFC Data Request 1.7**

**General** – Between the period beginning July 2021 and ending September 2024, please state the total amount of conservation dollars provided to PacifiCorp’s customers located within the boundaries of the Yakama Indian Reservation for the purpose of funding the Company’s conservation program’s rebates, discounts, or other monetary benefits used to support its energy efficiency programs.

### **Response to CRITFC Data Request 1.7**

For Home Energy Savings, Low Income Weatherization and Wattsmart Business energy efficiency (EE) projects completed July 2021 through September 2024, a total of approximately \$2 million was provided for customer sites located on census tracts either all or partially on Yakama Nation Reservation lands.

This total includes customer incentives, partner/vendor incentives, and direct installation costs since these are tracked by customer location in most cases. It does not include expenditures that are not tracked by customer location such as program implementation, marketing, internal labor costs, energy engineering provided for business customer projects, some customer incentives, etc.

Projects are included based on the savings reporting date, which determines the calendar year for savings reporting for the demand-side management (DSM) Annual Report.

The data above includes completed projects at customer sites on census tracts either all or partially on Yakama Nation Reservation Land since this data is readily available since this aligns with how Tribal Lands are defined for Highly Impacted Communities and Customer Benefit Indicator Metrics tracking.

Identification of census tract for customer sites is approximate and based on best available data.

PREPARER: Nancy Goddard

SPONSOR: Clay Monroe



## CRITFC Data Request 1.8

**General** – Please describe PacifiCorp’s internal decision-making structure for creating Customer Benefits Indicators (“CBI”) and any internal deadlines set for new CBIs.

### Response to CRITFC Data Request 1.8

PacifiCorp described its process for creating Customer Benefit Indicators (CBI) in its first Clean Energy Implementation Plan (CEIP), specifically Chapter 2 of PacifiCorp’s 2021 Revised CEIP.<sup>1</sup> Broadly, this structure included three components: (1) identifying key communities who are experiencing disproportionate challenges; (2) pinpointing challenges that can be reduced or improved by the utility and clean energy resources; and (3) developing metrics to track process relative to those challenges and benefits.

Since the filing of PacifiCorp’s CEIP, significant work has been done to broaden identification of key communities, like the development of a methodology to define and identify “vulnerable populations”. Additional work has been done to add new CBIs and metrics that tie into key utility actions, as described in PacifiCorp’s 2024 CEIP Progress Report.<sup>2</sup> PacifiCorp is currently in the process of reviewing and refreshing its CBIs and metrics to assess how well these metrics tie into important improvements in customer benefits and if utility actions are driving those improvements.

Each step in the process requires various input from internal subject matter experts as well as external feedback from the Company’s equity advisory groups and other interested parties. PacifiCorp will include opportunities for public feedback on any new proposed CBIs or metrics as they are being considered and evaluated for inclusion in the 2025 CEIP due October 1, 2025. There has not yet been any internal deadline set for development of new CBIs. This process is always evolving and to avoid becoming stagnant, development and improvement upon PacifiCorp’s CBIs will continue over time, beyond just the development of the next CEIP.

PREPARER: Rohini Ghosh

SPONSOR: Rohini Ghosh

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<sup>1</sup> Available online:

[https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/ceip/Clean\\_Energy\\_Implementation\\_Plan\\_Revised\\_Filed\\_March\\_13\\_2023.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/ceip/Clean_Energy_Implementation_Plan_Revised_Filed_March_13_2023.pdf)

<sup>2</sup> Available online:

[https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/ceip/210829\\_PAC\\_CEIP\\_2024\\_Progress\\_Rpt\\_7-1-24\\_finl.pdf](https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/ceip/210829_PAC_CEIP_2024_Progress_Rpt_7-1-24_finl.pdf)

### **CRITFC Data Request 1.9**

**General** – Please state whether PacifiCorp intends to create a specific CBI for its customers located within the boundaries of the Yakama Indian Reservation.

- (a) If the answer to the above DR is no, please explain the Company’s reasons and rationale for not doing so and provide date(s) of all such meetings, the individuals from PacifiCorp in attendance, any notes or minutes created by PacifiCorp as a result of such meetings, and any outcome(s) or agreements reached during such meetings.

### **Response to CRITFC Data Request 1.9**

At this time, PacifiCorp does not have a specific plan for a Customer Benefit Indicator (CBI) related only to customers located within the boundaries of the Yakama Indian Reservation. However, PacifiCorp is committed to further development of CBIs and coordinating with the Yakama Nation and welcomes further input on this matter. As with the creation of all CBIs, PacifiCorp would then plan to bring this to its Equity Advisory Group (EAG) for further feedback.

PREPARER: Kimberly Alejandro

SPONSOR: Rohini Ghosh

## **CRITFC Data Request 1.10**

**General** – Please state how PacifiCorp intends to use its Customer Benefits Indicators to inform the resource selections that would be included in its next Integrated Resource Plan.

### **Response to CRITFC Data Request 1.10**

PacifiCorp's identified Customer Benefit Indicators (CBI) represent important outcomes that are in some way driven by utility actions, including long-term supply-side resource decisions. However, the Integrated Resource Plan (IRP) relies on a systemwide model of the entire PacifiCorp system and does not offer enough granularity to be able to estimate many customer-specific impacts as measured by the CBIs and metrics. The Company identifies specific portfolio CBI metrics that can be measured as outcomes from each portfolio run that can help inform portfolio rankings or performance as described in PacifiCorp's 2021 Revised Clean Energy Implementation Plan (CEIP).

PacifiCorp is currently working on additional proposed portfolio CBI metrics that will be introduced to the Equity Advisory Group (EAG) and other engagement spaces as soon as possible.

PREPARER: Rohini Ghosh

SPONSOR: Rohini Ghosh

## **CRITFC Data Request 1.11**

**General** – Please state how PacifiCorp’s identification of highly vulnerable communities and its development of CBIs will inform its next All Source Request for Proposals?

### **Response to CRITFC Data Request 1.11**

PacifiCorp is still refining its process for identifying and tracking “vulnerable populations” in its Washington customer service territory as has been presented in the Clean Energy Implementation Plan (CEIP) engagement series and Vulnerable Populations workshops this past year.

In regard to the next All-Source Request for Proposals (AS RFP), there will be the inclusion of an equity questionnaire. This is optional for developers to fill out as part of their bid submission and contributes to resources’ non-price score. These specific questions help identify resources’ contribution to customer benefit indicator (CBI) outcomes. Currently, the Company has not determined a method to have state-specific CBI metrics inform an AS RFP.

PREPARER: Rohini Ghosh

SPONSOR: Rohini Ghosh

## CRITFC Data Request 1.12

**PacifiCorp Rebuttal Testimony** – In his rebuttal testimony, witness Matthew McVee states:

“CRITFC witness DeCoteau’s recommendation that the Commission direct PacifiCorp to model the impacts of the Columbia Basin’s hydroelectric generation system on anadromous and other natural resources is outside of PacifiCorp’s expertise and available data.”<sup>1</sup>

The following questions seek context for this statement.

Does PacifiCorp include Columbia River Basin hydropower generation when it models the market resources that may be available to balance its system?

(a) If so, what sources does PacifiCorp use for modeling the Columbia River Basin hydropower generation?

<sup>1</sup> Exh. MDM-2T, at 29.

## Response to CRITFC Data Request 1.12

PacifiCorp’s modeling for its Integrated Resource Plan (IRP) includes Columbia River Basin hydropower in the form of its long-term rights to shares of Grant County’s Priest Rapids and Wanapum hydro projects. PacifiCorp would note that these shares amount to less than 2 percent of its peak annual load, so changes in operational constraints to the Columbia Basin hydroelectric generation system would have limited impact on PacifiCorp’s planning and operations.

(a) For the modeling, the Company used the average values from approximately 30 models of two representative concentration pathways (RCP) 4.5 and RCP 8.5 climate projections. These projections are publicly available and were downloaded from the Downscaled CMIP3 and CMIP5 Climate and Hydrology Projections and can be accessed by using the following website link: [https://gdo-dcp.ucllnl.org/downscaled\\_cmip\\_projections/dcpInterface.html](https://gdo-dcp.ucllnl.org/downscaled_cmip_projections/dcpInterface.html), which inform the Company’s understanding of future hydrological conditions in the Columbia River Basin above Wanapum and Priest Rapids.

PREPARER: Dan MacNeil / Yutaka Hagimoto

SPONSOR: Tom Burns / Paul Wood

### **CRITFC Data Request 1.13**

**PacifiCorp Rebuttal Testimony** – In his rebuttal testimony, witness Matthew McVee states:

“CRITFC witness DeCoteau’s recommendation that the Commission direct PacifiCorp to model the impacts of the Columbia Basin’s hydroelectric generation system on anadromous and other natural resources is outside of PacifiCorp’s expertise and available data.”<sup>1</sup>

The following questions seek context for this statement.

Do PacificCorp’s modeling tools include federal hydropower capacity as an available market resource during the fall and winter months of the years covered by the Company’s most recent Integrated Resource Plan?

(a) If the answer is yes, please share data explaining the model’s selection for fall and winter month purchases in the years covered by the Company’s most recent Integrated Resource Plan.

<sup>1</sup> Exh. MDM-2T, at 29.

### **Response to CRITFC Data Request 1.13**

PacificCorp’s modeling tools do not include federal hydropower capacity and do not specify the source of market purchases.

PREPARER: Daniel MacNeil

SPONSOR: Matt McVee

## CRITFC Data Request 1.14

**PacifiCorp Rebuttal Testimony** – In his rebuttal testimony, witness Matthew McVee states:

“CRITFC witness DeCoteau’s recommendation that the Commission direct PacifiCorp to model the impacts of the Columbia Basin’s hydroelectric generation system on anadromous and other natural resources is outside of PacifiCorp’s expertise and available data.”<sup>1</sup>

The following questions seek context for this statement.

Is PacifiCorp aware or have knowledge of the stream flow limitations placed upon the Bonneville Power Administration’s hydropower operations by federal court order or by any other means used for the purpose of protecting the migration, habitat, and spawning areas of anadromous species within the Columbia River Basin?

(a) If the answer is yes, please provide that information. For information PacifiCorp has made public, PacifiCorp may provide a citation to its publicly available information.

<sup>1</sup> Exh. MDM-2T, at 29.

## Response to CRITFC Data Request 1.14

Yes.

(a) PacifiCorp is generally aware of stream flow limitations within the Columbia River Basin, specifically regarding minimum flow requirements and water usage for fish ladders at Wanapum and Priest Rapids dams. The Company generally understands that the necessary water volumes for these purposes are determined through complex calculations to ensure the protection of fish migration, habitat, and spawning areas. PacifiCorp is not specifically aware of these complex calculations.

Regarding Bonneville Power Administration's (BPA) hydropower operations, while the Company know that similar flow limitations exist, the Company does not have detailed operational control or in-depth knowledge of those specific constraints.

PREPARER: Yutaka Hagimoto

SPONSOR: Paul Wood

## CRITFC Data Request 1.15

**PacifiCorp Rebuttal Testimony** – In his rebuttal testimony, witness Matthew McVee states:

“CRITFC witness DeCoteau’s recommendation that the Commission direct PacifiCorp to model the impacts of the Columbia Basin’s hydroelectric generation system on anadromous and other natural resources is outside of PacifiCorp’s expertise and available data.”<sup>1</sup>

The following questions seek context for this statement.

Do PacifiCorp’s modeling tools consider stream flow limitations placed upon the Bonneville Power Administration’s hydropower operations by federal court order, agreement, or by any other means used for the purpose of protecting the migration, habitat, and spawning areas of anadromous species within the Columbia River Basin?

(a) If the answer is yes, please provide all documents describing the modeling constraints imposed in PacifiCorp’s modeling to reflect those limitations.

<sup>1</sup> Exh. MDM-2T, at 29.

## Response to CRITFC Data Request 1.15

No. PacifiCorp's modeling tools do not reflect the specific stream flow limitations placed upon Bonneville Power Administrations (BPA) hydropower operations. While non-generation flow at Wanapum and Priest Rapids dams, such as water used for fish conservation and spill during high flow periods, is considered, PacifiCorp does not model the specific constraints imposed on BPA by federal court orders or agreements.

PREPARER: Yutaka Hagimoto

SPONSOR: Paul Wood



## CRITFC Data Request 1.16

**PacifiCorp Rebuttal Testimony** – In his rebuttal testimony, witness Matthew McVee states:

“CRITFC witness DeCoteau’s recommendation that the Commission direct PacifiCorp to model the impacts of the Columbia Basin’s hydroelectric generation system on anadromous and other natural resources is outside of PacifiCorp’s expertise and available data.”<sup>1</sup>

The following questions seek context for this statement.

Over its planning horizon, does PacifiCorp’s IRP modeling increase limitations on Columbia river stream flow and generation capacity due to efforts to protect the migration, habitat, and spawning areas of anadromous species within the Columbia River Basin?

- (a) If so how?
- (b) If not, please provide all information used by PacifiCorp to determine that no limitations on stream flow or generation capacity will be placed on the Columbia River system over the planning horizon?
- (c) Please provide all information the company considered in its IRP on additional stream flow restrictions on the Columbia River system not in effect now that have been considered as an possible action to protect the migration, habitat, and spawning areas of anadromous species within the Columbia River Basin.
  - i. Did PacifiCorp model any of these restrictions as sensitivities?
  - ii. Please provide any information PacifiCorp has on how such restrictions might limit its availability of power PacifiCorp proposes to purchase from the market in its IRP.

<sup>1</sup> Exh. MDM-2T, at 29.

## Response to CRITFC Data Request 1.16

PacifiCorp’s integrated resource plan (IRP) modeling assumes that the stream flow and generation capacity limitations imposed for fish conservation, such as minimum flow requirements and water used for fish ladders, will remain constant over the planning horizon.

- (a) Not applicable.
- (b) After analyzing the past 10 years (2013 through 2022) of non-generation flow data for Priest Rapids and Wanapum dams, the Company found no clear upward trend. Based on this data, the Company assumes that the current limitations will remain unchanged in the future. Additionally, as far as the Company is aware, there is no movement specifically related to strengthening conservation measures or increasing flow restrictions at Priest Rapids and Wanapum. Therefore, in PacifiCorp's IRP modeling, the Company does not anticipate any additional limitations on stream flow or generation capacity during the planning horizon.
- (c) The Company has not modeled additional stream flow restrictions as sensitivities, and at present, the Company does not anticipate significant impacts on the availability of power to be purchased from the market due to such restrictions.

PREPARER: Yutaka Hagimoto / Daniel MacNeil

SPONSOR: Paul Wood / Tom Burns

## CRITFC Data Request 1.17

**PacifiCorp Rebuttal Testimony** – In his rebuttal testimony, witness Matthew McVee states:

“CRITFC witness DeCoteau’s recommendation that the Commission direct PacifiCorp to model the impacts of the Columbia Basin’s hydroelectric generation system on anadromous and other natural resources is outside of PacifiCorp’s expertise and available data.”<sup>1</sup>

The following questions seek context for this statement.

Over its planning horizon, does PacifiCorp’s IRP modeling increase limitations on Columbia river stream flow and generation capacity due to increasing drought, flooding, and other extreme weather events resulting from climate change?

- (a) If so how?
- (b) If not, please provide all information used by PacifiCorp to determine that no limitations on stream flow and generation capacity will be placed on the Columbia River system over the planning horizon?

<sup>1</sup> Exh. MDM-2T, at 29.

## Response to CRITFC Data Request 1.17

Yes.

- (a) PacifiCorp’s integrated resource plan (IRP) modeling does account for changes on Columbia River stream flow and generation capacity due to climate change-related extreme weather events, such as droughts and floods. As stated in the Company’s response to CRITFC Data Request 1.12, the modeling incorporates climate and hydrology projections based on future climate scenarios using representative concentration pathways, or RCP (RCP4.5 and RCP8.5, specifically), which provide insight into how stream flows might be affected by changing weather patterns over time.

PREPARER: Yutaka Hagimoto / Dan MacNeil

SPONSOR: Paul Wood / Tom Burns

## **CRITFC Data Request 1.18**

**PacifiCorp Rebuttal Testimony** – In his rebuttal testimony, witness Matthew McVee states:

“CRITFC witness DeCoteau’s recommendation that the Commission direct PacifiCorp to model the impacts of the Columbia Basin’s hydroelectric generation system on anadromous and other natural resources is outside of PacifiCorp’s expertise and available data.”<sup>1</sup>

The following questions seek context for this statement.

Does PacifiCorp support a request to BPA to change stream flows in order to generate power in a manner that violates federal court ordered stream flows limitations under circumstances in which PacifiCorp is short power and faces losing load or must choose to curtail its load? Does it support such a request in the case where a utility in the Western Interconnect faces losing load or must choose to curtail its load without the addition power from the federal system?

## **Response to CRITFC Data Request 1.18**

PacifiCorp does not currently have long-term contracts for power from the Bonneville Power Administration (BPA), and its long-term Integrated Resource Plan (IRP) has not included an option for power from BPA. In actual operations, PacifiCorp transacts with a wide range of utilities, both bilaterally and on an automated basis within the Western Energy Imbalance Market (WEIM), but it would not expect other utilities to violate laws, regulations, or other obligations on its behalf, even if there was an imminent loss of load risk. PacifiCorp is generally aware that some laws, regulations, and other obligations may apply differently in emergency conditions, and would appreciate the help that other utilities are able to provide to avoid curtailing firm load in such an emergency, though it does not plan on such assistance being available. However, PacifiCorp does not have expertise in the specific requirements applicable to BPA’s operations and does not have information about BPA’s priorities relative to hydro operations and reliable load service.

PREPARER: Dan MacNeil

SPONSOR: Matt McVee

### **CRITFC Data Request 1.19**

In his rebuttal testimony, witness Matthew McVee states,

“PacifiCorp believes these recommendations [of CRITFC witness DeCoteau, excluding recommendation 4] generally align with the company’s 16 ongoing planning and engagement activities.”<sup>2</sup>

- (a) Which, if any, of the recommendations witness DeCoteau provided does PacifiCorp believe is excluded from “the company’s ongoing planning and engagement activities”?

<sup>2</sup> Exh. MDM-2T, at 29.

### **Response to CRITFC Data Request 1.19**

- (a) As PacifiCorp interprets Columbia River Inter-Tribal Fish Commission (CRITFC) witness DeCoteau’s testimony, there are four recommendations:

1. PacifiCorp should be required to work directly with the Yakama Nation on energy efficiency (EE), weatherization, and distributed generation resource development at customer meter locations within the Yakama Reservation and nearby tribal communities;
2. PacifiCorp should develop a five-year development plan budget for the EE, weatherization, and distributed generation resource development identified in its assessment;
3. PacifiCorp should be required to model the impacts of the Columbia Basin’s mainstem hydroelectric system operations on anadromous and other natural resources under current operating limits set for salmonid protection and the costs associated with the protective limits on operations; and
4. PacifiCorp should work with the Yakama Nation and CRITFC to develop Community Benefit Indicators (CBI) that reasonable reflect the Yakama Nations’ treaty rights and lives of its people.

With the exception of the third recommendation, PacifiCorp believes its engagement activities generally align with the intent of the recommendations. PacifiCorp has been working on more actively engaging representatives of the Yakama Nation on these issues and is open to expanding engagement and developing a longer-term development plan for EE and weatherization. PacifiCorp, however, is limited to the boundaries of its service area given the socialization of costs to other customers.

Similarly, PacifiCorp is committed to further development of CBIs and coordinating with the Yakama Nation. Given CRITFC's mission to protect reserved rights under treaties with the United States (U.S.) Government,<sup>1</sup> which is outside the scope of PacifiCorp's operations, PacifiCorp believes its engagement should focus specifically on benefits to its customers that are part of the Yakama Nation.

PREPARER: Matt McVee

SPONSOR: Matt McVee

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<sup>1</sup> Exh. No. AKD-1T at 3:6-4:2.

### **CRITFC Data Request 1.20**

In cross-reply testimony, witness Charlee Thompson suggests a revised version of witness Decoteau's request that the Commission order PacifiCorp to model the impact of its hydro-system reliance in its 2025 IRP/CEIP that includes the following elements:

- i. Convene with CRITFC, the Yakama Nation, and other interested parties to discuss the goals and intended outcomes of modeling impacts of the Columbia Basin's mainstem hydroelectric system operations on anadromous and other natural resources under current operating limits set for salmonid protection and the costs associated with the protective limits on operations.
- ii. Convene with CRITFC, the Yakama Nation, and other interested parties to discuss the modeling process, including key parameter and data sources.
- iii. Inform CRITFC, the Yakama Nation, and other interested parties on PacifiCorp's progress to include the collaboratively-determined modeling process in the 2025 IRP and future IRPs.<sup>3</sup>

Is witness Thompson's proposal outside PacifiCorp's expertise and available data? If so, please explain.

<sup>3</sup> Exh. CT-3T, at 6-7, 11.

### **Response to CRITFC Data Request 1.20**

Yes. PacifiCorp uses electricity from Priest Rapids and Wanapum through Grant County, and the Company's involvement in the restrictions for salmonid protection has been indirect and passive. PacifiCorp's integrated resource planning (IRP) and clean energy planning teams have not accumulated the expertise and do not have access to the data needed to actively engage in discussions with stakeholders about the goals or outcomes of such restrictions.

PREPARER: Rohini Ghosh

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