

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER &
LIGHT COMPANY,

Respondent.

DOCKET UE-210829

MOTION FOR LEAVE
TO SUPPLEMENT
CROSS-EXHIBIT RG-18X

I. INTRODUCTION

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(a)(1)(i), Commission Staff respectfully requests leave to supplement cross exhibit RG-18X, which was originally filed on October 8, 2024, with RG-_XC, attached herein. On October 17, 2024, it was discovered that a confidential workpaper initially believed attached to RG-18X was just referenced in the exhibit, and not attached to the response. Staff now respectfully submits this motion to supplement the exhibit to ensure a more complete record before the Commission. The Energy Project does not object to this motion; no other party has indicated a position on this motion.

III. STATEMENT OF FACTS

2 On November 1, 2023, PacifiCorp filed with the Commission its Biennial Update to its 2021 Clean Energy Implementation Plan (Biennial Update).¹ The Biennial Update was ultimately set for adjudication by the Commission after the March 22, 2024, Recessed Open

¹ *Wash. Utils. & Transp. Comm'n v. PacifiCorp d/b/a Pac. Power & Light Co.*, Docket No. UE-210829, PacifiCorp's 2021 Clean Energy Implementation Plan (CEIP) Biennial Update (Nov. 1, 2023).

Meeting.² On April 23, 2024, a pre-hearing conference was held in this matter and a prehearing schedule established, with exhibits for Cross Examination due on October 8, 2024.³ On October 17, 2024, Staff discovered that the exhibit at issue was not attached to the filed cross exhibit RG-18X. This present motion was filed on October 18, 2024.

II. ARGUMENT

3 Commission rule permits parties to revise exhibits with leave from the presiding officer.⁴ The rules required that the moving party file “with the commission and serve all other parties [] a motion to make substantive changes to any prefiled exhibits as soon as practicable after discovering the need to make that change.”⁵ In considering such motions, the Commission has generally examined the timing of such motions, the prejudice to any other parties, and whether accepting such amendments will disrupt the procedural schedule of the case.⁶

4 Leave to supplement Exhibit RG-18X is warranted here as the confidential workpaper in question contains the content forming the basis to the responses contained in Staff Data Request (DR) 59, which is RG-18X. The document in question contains numerical data and graphs that provide the bases for PacifiCorp’s responses to Staff DR 59. Without this spreadsheet, the exhibit lacks the more substantive aspects of the response and is incomplete. Accepting this supplement will allow a more complete and accurate record before the Commission in consideration of this case. Staff acknowledges the late hour of this

² *Wash. Utils. & Transp. Comm’n v. PacifiCorp d/b/a Pac. Power & Light Co.*, Docket No. UE-210829, Order 09 at ¶ 23 (Mar. 25, 2024).

³ *Wash. Utils. & Transp. Comm’n v. PacifiCorp d/b/a Pac. Power & Light Co.*, Docket No. UE-210829, Order 11, Appendix B (May, 3, 2024).

⁴ WAC 480-07-460(1)(a)(i).

⁵ WAC 480-070460(1)(b).

⁶ *WUTC v. Cascade Natural Gas Corp.*, Docket No. UG-210755, Order 04 at ¶ 7 (Dec. 17, 2021).

filing; however, the document is one that has been available to all who have signed confidentiality agreements, and the document is one created by PacifiCorp. The Energy Project has already indicated that it does not object to this motion. Additionally, this will not disrupt the procedural schedule and does not present any new information.

VII. CONCLUSION

5 For the reasons listed above, it is in the public interest that the Commission grant Staff's motion to supplement cross exhibit RG-18X with the confidential workpaper that is referenced within the DR that comprises this exhibit. None of the parties are prejudiced by inclusion of this document, that has been readily available to all who signed a confidentiality agreement, and it was created by PacifiCorp.

DATED this 18th day of October, 2024.

Respectfully submitted,

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