

Twitchell, Jeremy (UTC)

From: Casey, Chris (UTC)
Sent: Sunday, April 17, 2016 12:40 PM
To: Twitchell, Jeremy (UTC)
Cc: Cameron-Rulkowski, Jennifer (UTC)
Subject: FW: UE-152253 - Supplementing response to UTC Staff Data Request No. 99 - Pacific Power response with confidential workpaper
Attachments: Synapse Adjustment 1 - October 2013 Coal Plan 03172016 - CONF.XLSX

Jeremy,

Please see the attachment and the email below, and then let me know if the Company provided you with the information you need.

Chris

From: Katherine McDowell [mailto:katherine@mrg-law.com]
Sent: Saturday, April 16, 2016 1:47 PM
To: Cameron-Rulkowski, Jennifer (UTC); Casey, Chris (UTC)
Cc: Matthew McVee
Subject: RE: UE-152253 - Supplementing response to UTC Staff Data Request No. 99 - Pacific Power response with confidential workpaper

Jennifer, thanks for your email. The Company is committed to providing all of the data Staff needs to review the Company's filing. In this case, we can confirm that the Company's response to WUTC 99 is correct and complete and explain where Staff can locate the October 2013 mine plan in the discovery and workpapers in this case.

The subject of WUTC 99 was "Bridger Selective Catalytic Reduction." The request asked for "Jim Bridger Mine's 2013 Mine Plan, as well as forward-looking costs for the mine's output that were identified in that plan." The Company reasonably construed this request as asking for the mine plan that supported the Company's SCR analysis in this case, the January 2013 mine plan. In its response, the Company referenced Sierra Club 1.8(a), where the Company produced the January 2013 mine plan on January 20, 2016. As background, Sierra Club 1.8(a) asked for support for the 4-unit and 2-unit capital costs in RTL-5C, which is a part of the SCR analysis. Sierra Club 1.8(a)'s language makes clear that the Company was providing the mine plan used in the SCR analysis (i.e. the January 2013 mine plan, not a mine plan produced later in 2013).

WUTC 99 did not ask the Company for the October 2013 mine plan referenced in Cindy Crane's rate case testimony in docket UE-140762. Had Staff made this request, the Company would have referred Staff to Sierra Club supplemental response 1.6(a), where the Company produced the October 2013 mine plan (which was also used in the Company's 2014 Utah rate case) on January 27, 2016. See Exh. No. JIF-1CT 16 at footnote 42.

In addition to this data request response, Staff can locate the October 2013 mine plan in the workpapers served in this case. Dr. Fisher included the October 2013 mine plan provided in Sierra Club 1.6 (a) in his confidential workpapers, served March 18, 2016. I have attached the relevant confidential workpaper; please see tab UT GRC Oct 2013 BCC OPEX.

I hope this explanation fully responds to your request regarding WUTC 99. If not, please contact me immediately so we can provide any additional information Staff requires.

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Best regards, Katherine

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From: Cameron-Rulkowski, Jennifer (UTC) [<mailto:jcameron@utc.wa.gov>]
Sent: Friday, April 15, 2016 4:19 PM
To: Katherine McDowell <katherine@mrg-law.com>; Matthew McVee <matthew.mcvee@pacificorp.com>
Cc: Casey, Chris (UTC) <ccasey@utc.wa.gov>
Subject: Re: UE-152253 - Supplementing response to UTC Staff Data Request No. 99

Dear Ms. McDowell and Mr. McVee,

In keeping with WAC 480-07-405, Staff asks that Pacific Power please supplement its response to UTC Staff Data Request No. 99 immediately. WAC 480-07-405, subsection 8, provides that “[p]arties must immediately supplement any response to a data request, record requisition, or bench request upon learning that the prior response was incorrect or incomplete when made or upon learning that a response, correct and complete when made, is no longer correct or complete.”

In UTC Staff Data Request No. 99, Staff requested that Pacific Power “provide the Jim Bridger Mine’s 2013 Mine Plan, as well as forward-looking costs for the mine’s output that were identified in that plan.” Staff understood that the mine plan provided was the plan that Pacific Power witness Cindy Crane referred to as “the most recent BCC mine plan, which was finalized in October 2013,” in her testimony in the UE-140762 general rate case. See Docket UE-140762, Exh. No. CAC-1CT 7:5-7.

On rebuttal, Pacific Power witness Dana Ralston explained “that BCC developed two mine plans in 2013, one in January 2013, which the Company used in the SCR analysis and generally referred to as the ‘2013 mine plan,’ and a second mine plan in October 2013.” Exh. No. DR-1CT 4:5-8.

Staff has now discovered that Pacific Power provided the January 2013 plan in response to UTC Staff Data Request No. 99 but did not provide the October 2013 plan. Accordingly, Staff asks that the company supplement its response and immediately provide the October 2013 mine plan.

Regards,

Jennifer Cameron-Rulkowski
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