

Confidential per WAC 480-07-160
Exh. RJM-1CT_r
Docket UE-23—0172
Witness: Ramon J. Mitchell

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-23—0172

PACIFICORP

REDACTED DIRECT TESTIMONY OF RAMON J. MITCHELL

March 2023 (REVISED April 4, 2023, and REFILED April 19, 2023)

1 **Q. If Washington provides no-cost allowances to account for Washington load**
2 **service, why is the Cap and Invest program still resulting in increased NPC?**

3 A. As previously mentioned, in the WIJAM spreadsheet allocation method there is a net
4 open position that results from insufficient energy allocated to serve Washington load.
5 This net open position is closed with modeled energy at average market prices and the
6 resulting cost increases Washington-allocated NPC. Since the Cap and Invest program
7 decreases the energy output (generation) at the Chehalis plant, the WIJAM's net open
8 position becomes larger. Therefore, the resulting cost to close this net open position
9 becomes correspondingly greater.

10 **C. Jim Bridger's Gas Conversion**

11 **Q. Please describe what is taking place at Jim Bridger Units 1 and 2.**

12 A. Jim Bridger Units 1 and 2 are proposed to be converted to gas-fired units. Currently,
13 these two units are coal-fired. The Company's proposal to convert Jim Bridger Units
14 1 and 2 was filed in a separate application on December 9, 2022, and is a pending
15 case with the [Wyoming Public Service](#) Commission.⁷

16 **Q. Why are Jim Bridger Units 1 and 2 being converted to gas?**

17 A. Emissions requirements imposed by the EPA required the installation of a selective
18 catalytic reduction system to reduce NO_x emissions from Jim Bridger Units 1 and 2
19 for continued coal-fired operations.⁸ ~~p~~Past December 31, 2023, ~~G~~gas conversion was
20 identified as a more economically viable option in the long-term analysis of the

⁷ See, *In the Matter of the Application of Rocky Mountain Power for Authority to Convert the Primary Fuel Source from Jim Bridger Power Plant Units 1 and 2 from Coal to Natural Gas*, Docket No. 20000-628-EA-22 (Record No. 17212).

⁸ [40 C.F.R. §52.2636\(d\)\(1\)](#).