UE-210829

825 NE Multnomah, Suite 2000 Portland, Oregon 97232

OMMISSIO



April 19, 2022

VIA ELECTRONIC FILING

Amanda Maxwell Executive Director and Secretary Washington Utilities and Transportation Commission 621 Woodland Square Loop SE Lacey, WA 98503

Re: Docket UE-210829 Errata to PacifiCorp's Final Clean Energy Implementation Plan

PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp) submitted its Final Clean Energy Implementation Plan (CEIP) to the Washington Utilities and Transportation Commission on December 30, 2021. In the process of retrieving and reviewing data in response to a data request, PacifiCorp discovered a formula error in its incremental cost calculation reporting.

The correction results in an average annual cost reduction of \$4.93 million in the incremental cost calculation exercise over the four-year CEIP compliance period (calendar years 2022-2025). This reporting error only impacts the incremental cost calculation and does not impact any other analysis or outcomes within the 2021 Integrated Resource Plan or 2022 CEIP action items or workpapers.

PacifiCorp is providing a redline of the affected pages of the CEIP document that reflects the correction, as well as a clean copy of the full document with the corrections included.

Confidential information is provided under WAC 480-07-160. These confidential materials include the following spreadsheets and data files: 210829-PAC-WP-Cost-Summary-4-19-22(C)-CORRECTED" and "210829-PAC-WP-St-Summary-4-19-22(C)-CORRECTED." The Company has provided both redacted and confidential versions of these three files. Each contains confidential information as defined in WAC 480-07-160(2)(b) (defining "confidential information generally"), RCW 80.04.095 (describing process to protect records containing "commercial information"), and RCW 81.77.210 (same). Specifically, the files contain competitively sensitive and proprietary information including contract pricing, detailed load forecasts, and detailed resource cost data and third-party proprietary modeling information. Disclosure of the information in these files would result in an unfair competitive disadvantage and result in financial harm to the Company. This financial harm will result from the Company's inability to negotiate lowest-cost pricing on behalf of its customers if its contractual counterparties are put on notice that pricing and contract terms will be disclosed on the public record. This financial harm would ultimately harm customers if PacifiCorp is required to incur greater costs associated with providing electric service.

It is respectfully requested that all formal data requests regarding this filing be addressed to the following:

Records Management 04/19/22 09:04:47 State Of WASH. UTIL. AND TRANSP. April 19, 2022 Page 2

By email (preferred):	datarequest@pacificorp.com
By regular mail:	Data Request Response Center PacifiCorp 825 NE Multnomah Street, Suite 2000 Portland, OR 97232

Formal correspondence should be directed to:

Washingtondockets@pacificorp.com CEIP@pacificorp.com

Please direct informal inquiries to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

Sincerely,

/s/ Shelley McCoy Director, Regulation PacifiCorp 825 NE Multnomah Street, Suite 2000 Portland, OR 97232 (503) 813-5292 shelley.mccoy@pacificorp.com

Enclosures

210829-PAC-ERRATA-4-19-2022 210829-PAC-REDLINE-ERRATA-4-19-2022 210829-PAC-Pubilc-WPs-4-19-22.zip 210829-PAC-Confidential-WP-4-19-22.zip [submitted via Box.com] 210829-PAC-Redacted-WP-4-21-22 [submitted via Box.com]