

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFIC POWER & LIGHT  
COMPANY,

2018 Power Cost Adjustment Mechanism

Docket UE-190458

PACIFIC POWER & LIGHT  
COMPANY'S MOTION TO ALLOW  
SUPPLEMENTAL TESTIMONY

In the Matter of the Investigation of

AVISTA CORPORATION d/b/a AVISTA  
UTILITIES, PUGET SOUND ENERGY, and  
PACIFIC POWER & LIGHT COMPANY

Regarding Prudency of Outage and  
Replacement Power Costs

Docket UE-190882

PACIFIC POWER & LIGHT  
COMPANY'S MOTION TO ALLOW  
SUPPLEMENTAL TESTIMONY

**I. INTRODUCTION**

*1* Consistent with Wash. Admin. Code 480-07-375(1)(d) and 480-07-460(1)(a)(i) PacifiCorp d/b/a Pacific Power and Light Company (Pacific Power) requests leave to supplement the testimony originally filed in Pacific Power's Power Cost Adjustment Mechanism (PCAM) Proceeding<sup>1</sup> with the Direct Testimony of Charles L. Tack. Pacific Power additionally requests leave to file this testimony in the Investigation Regarding Prudency of Outage and Replacement Power Costs (Colstrip Investigation)<sup>2</sup> as a supplement to the initial testimony that has been previously incorporated into that docket from the PCAM Proceeding.

**PROCEDURAL BACKGROUND**

*2* On June 3, 2019, Pacific Power filed its Power Cost Adjustment Mechanism filing including the direct testimony of Michael G. Wilding. On September 26, 2019, the Staff of

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<sup>1</sup> Docket No. UE-190458.

<sup>2</sup> Docket No. UE-190882.

the Utilities and Transportation Commission (Commission) (Staff) filed a motion with the Commission that requested to sever Avista Corporation's power cost filing<sup>3</sup> from their general rate case<sup>4</sup> and consolidate it with Pacific Power's PCAM and Puget Sound Energy's Power Cost Adjustment Mechanism<sup>5</sup> to facilitate resolution of issues that had been raised about a 2018 outage at the Colstrip generation station (2018 Colstrip Outage). On October 24, 2019, the Commission issued an order suspending Pacific Power's PCAM and setting it for adjudication along with opening an investigation into the 2018 Colstrip outage.<sup>6</sup> Through that order, the Commission placed:

all portions from the initial filings of Avista, PSE, and Pacific Power in Dockets UE-190222, UE-190324, and UE-190458, respectively, pertaining to the prudence of decision making leading up to the 2018 Colstrip outage and the costs incurred to acquire replacement power into Docket UE-190882 as the Companies' initial filing on those limited issues.<sup>7</sup>

As a result, Pacific Power's direct testimony, originally filed on June 3, 2019 was incorporated into the record in the Colstrip Investigation.

### **PACIFIC POWER'S MOTION**

3 Under Wash. Admin. Code 480-07-375(1)(d) and 480-07-460(1)(a)(i) a party may request leave to add to evidentiary record in a proceeding and file substantive changes to its direct testimony. Pacific Power now requests leave of the Commission to allow the filing of a supplemental piece of direct testimony in Pacific Power's PCAM Proceeding and the Colstrip Investigation. Beginning in August of 2019, Pacific Power has been engaged in discovery with Staff to provide information on the 2018 Colstrip outage. Pacific Power held

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<sup>3</sup> Docket No. UE-190222.

<sup>4</sup> Docket No. UE-190334.

<sup>5</sup> Docket No. UE-190324.

<sup>6</sup> Order 01, Docket No. UE-190882 (October 24, 2019).

<sup>7</sup> Order 01, Docket No. UE-190882 at ¶25.

a technical workshop with Staff on September 20, 2019. Through discussions with Staff, Pacific Power determined that it would be the most helpful to parties in both dockets for Pacific Power to file supplemental testimony to provide a full narrative on the 2018 Colstrip Outage and addressing many of the issues that had been raised in the discovery process. By providing this information before Staff, Public Counsel, and Intervenor Response Testimony, it would contribute to a more robust record in both Pacific Power's PCAM proceeding and the Colstrip Investigation.

4           In order to accomplish this, Pacific Power worked with the parties and the Administrative Law Division to modify the procedural schedule and allow this testimony to be filed before responsive testimony from other parties is filed.<sup>8</sup> On November 25, 2019, Judge O'Connell issued a notice revising the procedural schedule in the Colstrip Investigation to allow additional time for Pacific Power to file this testimony.

5           Pacific Power's testimony provides a narrative detailing the events leading up to the outage, the steps taken after the outage occurred, and the results of the subsequent inquiries conducted through the root cause analysis and by the Montana Department of Environment Quality.<sup>9</sup> Not only does this filing support a more robust record for the Commission, it also supports Pacific Power's efforts to work collaboratively with the other parties in this docket. As a result Pacific Power requests that the Commission grant this motion.

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<sup>8</sup> Docket No. UE-190882, Notice Revising Procedural Schedule and Notice of Hearing (November 27, 2019).

<sup>9</sup> Since this testimony is wholly new and supplemental to Pacific Power's initial filing and supported by a new witness, Pacific Power has not labeled this testimony as a revision as described in Washington Regulations for substantive changes to testimony. *See* Wash. Admin Code 480-07-460(1)(a)(iii). This was done in order to avoid any confusion since there was no previous version of Mr. Tack testimony to revise.

Respectfully submitted this 5<sup>th</sup> day of December, 2019.

/s/

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