

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

V.

PACIFICORP DBA PACIFIC POWER &  
LIGHT COMPANY,

Respondent.

Docket UE-191024

PACIFICORP'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 dba Pacific Power & Light Company (PacifiCorp) requests leave to supplement the testimony originally filed on December 13, 2019, with the Supplemental Testimony of Michael G. Wilding and Dana M. Ralston regarding net power costs.

**II. PROCEDURAL BACKGROUND**

*2* On December 13, 2019, PacifiCorp filed a general rate case, including the direct testimony of Mr. Wilding, which among other issues, supported PacifiCorp's forecast net power costs. On February 3, 2020, the Washington Utilities and Transportation Commission (Commission) issued a Pre-Hearing Conference Order that set a procedural schedule which allowed for the filing of Supplemental Testimony updating PacifiCorp's revenue requirement on April 1, 2020, based on decommissioning studies that were currently ongoing at the time.<sup>1</sup> On March 13, 2020, the Commission issued an order that among other rulings, directed

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<sup>1</sup> Order 03 at Appendix B (Feb. 3, 2020).

PacifiCorp to file supplemental testimony on the Colstrip coal supply agreement, also on April 1, 2020.<sup>2</sup>

### III. PACIFICORP'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 the evidentiary record in a proceeding and file substantive changes to its direct testimony. PacifiCorp now requests leave of the Commission to allow the filing of supplemental testimony in this proceeding to provide certain updates to forecast net power costs.

4 PacifiCorp has generally provided updates to net power costs through the course of a general rate case, which include updates to certain assumptions and inputs in the net power cost models with the latest information.<sup>3</sup> This is a process that is consistent with other recently filed general rate cases as well.<sup>4</sup> The updates identified here are traditionally filed later in the proceeding, along with rebuttal testimony.<sup>5</sup> However, after discussions with the Staff of the Washington Utilities and Transportation Commission (Staff), PacifiCorp determined that it would be beneficial in this rate case to provide these updates earlier in the process, so that Staff, Public Counsel, and other intervenors would have the opportunity to review these updated costs in advance of filing their response testimony. Specifically, PacifiCorp will be updating the following power cost modeling items: changes for the

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<sup>2</sup> Order 05 at ¶11 (Mar. 13, 2020).

<sup>3</sup> See *WUTC v. Pac. Power & Light Co.*, Docket No. UE-140762, Order 07 at ¶4 (Dec. 5, 2014).

<sup>4</sup> *WUTC v. Puget Sound Energy*, Docket No. UE-190529, Order 03 at Appendix B (July 22, 2019)(which identified the power cost update “to consist exclusively of updates to (1) forward market data, (2) short-term fixed-price power contracts that are an AURORA input, (3) fixed-price gas for power contracts, (4) index-based power and gas for power contracts, and (5) costs that are themselves dependent on the updated AURORA output”).

<sup>5</sup> “The Commission has routinely during the past decade allowed, and even required, power cost updates related to changes in fuel supply costs late in general rate proceedings, even at the compliance stage.” *WUTC v. Pac. Power & Light Co.*, Docket No. UE-140762, Order 07 at ¶4 (Dec. 5, 2014).

removal of Cholla Unit 4, updated transmission links, the inclusion of hydroelectric facilities on the Klamath River, fuel prices, the Official Forward Price Curve, Western Energy Imbalance Market benefits, wheeling cost, and other contract updates.

5 By filing this testimony and updates on April 1, they will also be aligned with the updates to revenue requirement for revised decommissioning costs, and the filing of supplemental testimony on the Colstrip coal supply agreement. PacifiCorp has reached out to Staff, Public Counsel, Packaging Corporation of America (PCA), Wal-Mart, and The Energy Project, and no party objects to this motion or supplemental testimony. PCA does not object based on its understanding that it may propose additional updates to PacifiCorp's net power costs in its response testimony in this proceeding. Therefore, PacifiCorp requests that the Commission grant this motion.

Respectfully submitted this 1<sup>st</sup> day of April, 2020.

/s/

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