

**Exh. WY-7C
Docket UE-230482
Witness: Wesley Yeomans
REDACTED**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFIC POWER & LIGHT COMPANY

**2022 Power Cost Adjustment Mechanism
Annual Report**

DOCKET UE-230482

EXHIBIT TO TESTIMONY OF

WESLEY YEOMANS

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PacifiCorp Response to WUTC DR 1e CONF

March 28, 2024

UE-230482 / PacifiCorp
October 24, 2023
WUTC Data Request 1

WUTC Data Request 1

Power Costs - Regarding Exh-RJM-1T at 4-5:

- (a) Please provide PacifiCorp's internal manual, plan or other documentation setting out its policies and practices for hedging and the related risk management program, such as (but not limited to) allowed amounts, timing, and approval processes for hedges.
- (b) If no responsive documents are available in response to subpart (a), please explain how PacifiCorp exercises internal oversight over hedging activities without documented policies and practices.
- (c) Please identify state proceedings where the documents provided in response to subpart (a) have been reviewed by the relevant regulatory authority. If more than one proceeding has occurred in any state, please identify the most recent proceeding in which a full review occurred as well as the most recent proceeding in which a partial review occurred.
- (d) Please supply any third-party or internal reviews or audits of hedging activities for compliance with the policy and practice documents provided in response to this data request. If many such documents exist, please provide all documents over the past five years and at least 4 such documents.
- (e) Please provide the two most recent semi-annual hedging reports prepared by the Company.
- (f) Please provide presentations to commission staff over the past five years describing any changes to the Company's risk and hedging policies.
- (g) Please provide the presentation made to Washington Commission staff on April 19, 2021.

Response to WUTC Data Request 1

- (a) Please refer to the Company's responses to AWEC Data Request 002, AWEC Data Request 003, AWEC Data Request 004 and AWEC Data Request 005.
- (b) Please refer to the Company's response to subpart (a) above.
- (c) PacifiCorp objects to this request as overly broad, unduly vague, burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objection the Company responds as follows:

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PacifiCorp provides the documents referenced in subpart (a) above regularly to commissions and regulatory authorities in its six-state jurisdictions as requested in various net power costs (NPC) proceedings and other regulatory proceedings. PacifiCorp cannot speak to the extent to which any regulatory authority reviews these documents.

- (d) PacifiCorp objects to this request as overly broad, unduly vague, burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objection, the Company responds as follows:

Please refer to Confidential Attachment WUTC-1 which provides copies of PacifiCorp's Sarbanes-Oxley Act of 2002 (SOX) Section 404 energy trading cycle key control testing audit reports for calendar years 2018 through 2022. Note: as it pertains to hedging transactions, the relevant control is "IM08". PacifiCorp's has not engaged any third party auditors specifically to review the Company's hedging activities.

- (e) Please refer to Confidential Attachment WUTC 1-2 which provides copies of the Company's February 15, 2023 and August 15, 2023 Semi-Annual Hedging Reports which were filed with the Idaho Public Utilities Commission (IPUC), the Public Utility Commission of Oregon (OPUC), the Public Service Commission of Utah (UPSC) and the Wyoming Public Service Commission.
- (f) Please refer to the Company's response to AWEC Data Request 006.
- (g) Please refer to the Company's response to subpart (f) above.

Confidential information is provided subject to WAC 480-07-160 and a confidentiality agreement for Staff's consultants.

PREPARER: John Fritz / Paul Wood / Seth Awram

SPONSOR: John Fritz / Paul Wood / Seth Awram

**Attachment to Exh. WY-7C
is redacted in its entirety.**