

**Exh. MAB-4  
Dockets UE-230172 and UE-210852  
Witness: Molly A. Brewer**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PACIFICORP d/b/a PACIFIC POWER  
AND LIGHT COMPANY,**

**Respondent.**

**DOCKETS UE-230172 and  
UE-210852 (Consolidated)**

**In the Matter of**

**ALLIANCE OF WESTERN ENERGY  
CONSUMERS'**

**Petition for Order Approving Deferral of  
Increased Fly Ash Revenues**

**EXHIBIT TO TESTIMONY OF**

**MOLLY A. BREWER**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PacifiCorp's Response to UTC Staff Data Request No. 25*

**September 14, 2023**

UE-230172 / PacifiCorp  
June 28, 2023  
WUTC Data Request 25

## **WUTC Data Request 25**

### **Equity**

- (1) Please provide all documents related to how PacifiCorp applied an equity lens, including but not limited to the tenants of energy justice and principles mentioned in Data Request 24, to the construction of the Ahtanum and Flint substations with new 115 kV transmission lines mentioned in Company witness Vail and Medina's testimonies.
- (2) Please provide documents that show how and why the Company decided against the alternative listed in Company witness Vail's testimony on page 27, lines 1-10. Please provide documents that show the restrictions that the Yakima Nation enacted, as described in Vail's testimony, on page 27 lines 2-3, and provide a narrative description explaining if the Flint 115-12.5 kV that PacifiCorp completed either violates or complies with those restrictions.
- (3) Please provide documents that show how the construction of these substations may provide a direct benefit to the Yakima Indian Reservation, including any attempt to quantify and distribute benefits equitably. In addition, provide documents that show how the Company considered potential burdens or unintended consequences to the Yakima Indian Reservation, and any steps it will take to mitigate those burdens.

## **Response to WUTC Data Request 25**

PacifiCorp assumes that the reference to "equity lens" refers to guidance provided by the Washington Utilities and Transportation Commission (WUTC) in paragraph 58 of Order 09 issued on August 23, 2022, in Docket UG-210755. PacifiCorp notes that the WUTC's guidance regarding the equity lens was issued on August 23, 2022, as part of the proceedings involving Cascade Natural Gas, Inc., in Order 09 within Docket UG-210755 (Order 09). PacifiCorp filed its multi-year rate plan (MYRP) less than a year after this guidance was issued. Furthermore, the decision to construct the Ahtanum and Flint substations, along with new 115 kilovolt (kV) transmission lines, was made in year 2018 for Flint and 2021 for Ahtanum substation. PacifiCorp objects to the extent that this data request is based on the assumption that Order 09 imposes an evidentiary standard mandating the creation, retention, and/or production of certain documentation. Based on the foregoing assumption, and without waiving the foregoing objection, PacifiCorp responds and follows:

- (1) The Company evaluates and plans its distribution system to provide equitable access to electric service for all customers. The Ahtanum and Flint projects collectively provide capacity relief to eight distribution substations. By prudent planning to ensure distribution substation capacity is adequate to meet

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the needs of existing customers and projected growth, the Company aims to correct any existing systemic inequities with respect to access to electric service.

- (2) As described in the direct testimony of Company witness Richard A. Vail, page 27, lines 3-7, both the evaluated alternative construction of a Donald area substation and associated transmission and the selected project of construction of Flint substation and associated transmission upgrades were evaluated to respect the Yakama Nation's restrictions on the company's ability to upgrade distribution system facilities. As both the selected and alternative projects were consistent with principles of equity, the decision to proceed with Flint substation over the alternative was based on the capacity added for the initial investment cost, consistent with prudent utility practice.
- (3) As described in Mr. Vail's direct testimony, page 25, lines 17-18 and page 27, line 2, the Ahtanum and Flint projects respect the Yakama Nation's restrictions that prevent the upgrade of distribution system facilities. Yakama Power interconnects with the Company's Wapato substation at 12.5 kV to provide service to a portion of the Yakama Indian Reservation. While the Company has not recently received load increase requests from Yakama Power, the distribution capacity relief provided by the Flint 115-12.5 kV project ensures equitable electric service access to customers of both the Company and Yakama Power.

PREPARER: Scott Beyer / Neil Jones

SPONSOR: Rick A. Vail