

**Exh. JDW-4C
Docket UE-230482
Witness: John D. Wilson
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

JOHN D. WILSON

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

PacifiCorp Response to UTC Staff Data Request No. 27 – 1st Supplemental

March 28, 2024

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WUTC Data Request 27

CONFIDENTIAL REQUEST - Follow-up regarding Attach. WUTC 16-2, workbooks “2022 Hourly EIM Transfers” and “2022 Hourly Owned-Contracted”

WUTC DR 16(b) requested “The actual system sales, purchases, or generation (in MWh) for each resource listed in tab “WIJAM NPC Before Balancing” with a non-zero allocation to Washington (column E)”. The Total Resources in column F total to [REDACTED]

and the Total Requirements total to [REDACTED]

The hourly data provided in Attach WUTC 16-2 do not sum to these figures after applying the allocation factor in column E, as shown in the following table. Please provide the missing data and, if errors are identified, corrected data that reconcile with column F as requested in DR 16(b).

[REDACTED]

[REDACTED]

[REDACTED]

1st Supplemental Response to WUTC Data Request 27

PacifiCorp objects to this request as overly broad, unduly burdensome, outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objection, PacifiCorp responds as follows:

Further to the Company’s response to WUTC Data Request 27 dated February 28, 2024, the Company provides the following additional information:

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The Company clarifies that the two referenced confidential work papers were provided with the Company's response to WUTC Data Request 16 dated November 13, 2023, and were both provided in Confidential Attachment WUTC 16-2. In addition, the Company clarifies that "The actual system sales, purchases, or generation (in MWh) for each resource listed in tab "WIJAM NPC Before Balancing" with a non-zero allocation to Washington (column E)" was requested in WUTC Data Request 16 subpart (c), not subpart (b). The Company further clarifies that it has not reviewed or verified Washington Utilities and Transportation Commission (WUTC) staff's analysis provided in the confidential table to this data request. Based on the foregoing clarifications, the Company provides the following additional information:

Please refer to Confidential Attachment WUTC 27 1st Supplemental; the contents of which is explained below:

PacifiCorp does not have hourly data for every non-zero element in the Washington Inter-Jurisdictional Allocation Methodology (WIJAM). Specifically, the "Other Firm Sales", "Total Short Term Purchases" and "Secondary Purchases" contain many items that PacifiCorp does not have hourly data for. Below are some examples of the items in these three categories that PacifiCorp is unable to provide hourly data for:

1. **"Other Firm Sales"** - The only item in "Other Firm Sales" is real power loss reimbursements from PacifiCorp transmission customers. PacifiCorp has approximately 60 transmission customers each year that reserve transmission capacity on PacifiCorp's system. Each of these customers schedules power to flow on PacifiCorp's system. For every electron that a transmission customer flows on PacifiCorp's system, a reservation and schedule is required, and that customer is required to compensate PacifiCorp for the real power losses associated with their energy schedules. PacifiCorp's accounting and reporting systems are currently only built to collect this data at the monthly level from the thousands of schedules associated with these 60 customers as this represents every energy flow that occurred on PacifiCorp's transmission system multiplied by PacifiCorp's tariff real power loss rate. The grid operations systems track the actual flows via electronic tags (eTag) but PacifiCorp does not have the ability to pull the hourly level schedules for every customer up to a reporting system. Only monthly level granularity is necessary for general ledger (G/L) recordkeeping and reporting.

Please refer to Confidential Attachment WUTC 27 1st Supplemental, tab "Other Firm Sales-MWH", which provides the available data for calendar year 2022.

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2. **“Total Short Term Purchases” and “Secondary Purchases”** – Please refer to Confidential Attachment WUTC 27 1st Supplemental, tab “Other Firm Purchases-MWH” and tab “Secondary Purchases-MWH” and to the additional tabs that are referenced on either of the aforementioned tabs for the available data for calendar year 2022. The “Total Short Term Purchases” and “Secondary Purchases” categories include:

- PacifiCorp physical energy loss returns to third-party transmission providers.
- Third-party transmission customer loss returns to PacifiCorp.
- Non-monetary exchanges.
- Miscellaneous energy only interchange transactions.
- Imbalance energy.
- Energy pass-thru arrangements.

PacifiCorp either (a) does not have hourly information for many of these transactions, or (b) does not have reporting systems that store the data at the hourly level available to be retrievable for reporting. Examples of PacifiCorp not having hourly information are the Portland General Electric Company (PGE) Carco and Grand Ronde imbalances between what PacifiCorp schedules to PGE and the actuals loads for Carco and Grand Ronde. The Grand Ronde and Carco loads rely on a monthly meter reads similar to a house electric utility meter and there is no hourly interval meter data available. A similar example is PacifiCorp’s imbalance with Avista for the Imnaha Idaho loads. The Company relies on meter reads from Avista that is sent to PacifiCorp in an email that is only daily. Examples of PacifiCorp not having the reporting system available to report on the hourly data are the third-party transmission customer imbalances. This category of costs includes the imbalances PacifiCorp’s 60 third-party transmission customers have on their generation, load and interchange. PacifiCorp does not have a data warehouse the stores this data in the hourly format so that it is retrievable for reporting.

Furthermore, prior period adjustments can result in hourly data not always matching monthly accounting period data on a month-for-month basis. One example of this is when there are telecommunication issues between the MV-90 meter data management system making telephone calls to all the meters at the generator sites to retrieve interval metering data if the issue is not discovered until subsequent accounting periods. For example, a generator in December 2021 had 1,000 megawatt-hours (MWh) of generation but there was a communication

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disruption with the transfer of the interval meter data to the meter data management system and that system only received 900 MWh when the December 2021 accounting entries were made. If the issue was not discovered until the February 2022 accounting period, the additional 100 MWh would be recorded in the February 2022 accounting period along with the dollars associated with the generation purchase. All the accounting systems rely on monthly level granularity data and would store the 900 MWh in December 2021 and the 100 MWh in February 2022. Then, when a request for hourly generation is made, the trading system is queried, and the 1,000 MWh in December 2021 is obtained from the query because by the time the request was made the meter data was corrected in the system. The result is the WIJAM file in December 2021 shows 900 MWh, but the hourly detail has 1,000 MWh. To reconcile the difference, the prior period adjustments in the WIJAM file for February 2022 would need to be added to the WIJAM file for December 2021 to agree to the hourly information. This fact is important to realize when requesting hourly information that hourly information is not available on an accrual accounting basis that matches the periods at which monthly entries are made in the accounting systems. Hourly data is always on an operation month basis. It would not be possible to show hours in February 2022 that relate to hours in December 2021 in this example.

Confidential information is provided subject to WAC 480-07-160 and the protective order that has been issued in this proceeding.

PREPARER: Various

SPONSOR: Various