

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

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

Respondent.

DOCKET UE-230172
(*Consolidated*)

In the Matter of

ALLIANCE OF WESTERN ENERGY
CONSUMERS'

Petition for Order Approving Deferral of
Increased Fly Ash Revenues

DOCKET UE-210852
(*Consolidated*)

EXHIBIT BGM-5
RESPONSES TO DISCOVERY REQUESTS

UE-230172 / PacifiCorp
August 3, 2023
AWEC Data Request 029

AWEC Data Request 029

Cost of Capital - Please provide the following information for all deferrals that had outstanding balances, or were being accrued or amortized at any time, from 2020 to present:

- (a) Balance by month from January 2020 to present.
- (b) Date amortization or recovery of accrual began or is expected to begin.
- (c) Expected amortization period.

Response to AWEC Data Request 029

Please refer to Attachment AWEC 029.

In preparing the historical information for this data request response, the Company observed minor inaccuracies in the reported balances for the Clean Energy Transportation Act (CETA) deferral, Transportation Electrification (TE) deferral, and Pryor Mountain renewable energy credit (REC) revenues deferral balances as reflected in the Company's direct filing. In its rebuttal filing, the Company will reflect all corrections to these balances such that the amounts reflected in this general rate case (GRC) will align with historical balances presented in Attachment AWEC 029. The estimated impact of the corrections is expected to increase revenue requirement by approximately \$30,000, before tax impacts.

PREPARER: Mitchell Harbick / Cindy Steinmetz / Sherona Cheung

SPONSOR: Sherona L. Cheung

**PacifiCorp
Washington 2023 General Rate Case
Regulatory Assets and Liabilities Amortization
COVID-19 Deferred Costs**

	Beg. Bal	Deferral	End Bal
2020 January	-	-	-
February	-	-	-
March	-	-	-
April	-	-	-
May	-	-	-
June	-	-	-
July	-	-	-
August	-	-	-
September	-	-	-
October	-	-	-
November	-	-	-
December	-	-	-
2021 January	-	-	-
February	-	-	-
March	-	-	-
April	-	1,076,645.32	1,076,645.32
May	1,076,645.32	226,131.65	1,302,776.97
June	1,302,776.97	172,696.54	1,475,473.51
July	1,475,473.51	142,838.38	1,618,311.89
August	1,618,311.89	231,974.80	1,850,286.69
September	1,850,286.69	151,250.06	2,001,536.75
October	2,001,536.75	122,962.16	2,124,498.91
November	2,124,498.91	198,204.86	2,322,703.77
December	2,322,703.77	683,355.93	3,006,059.70
2022 January	3,006,059.70	60,276.98	3,066,336.68
February	3,066,336.68	19,508.02	3,085,844.70
March	3,085,844.70	13,442.98	3,099,287.68
April	3,099,287.68	-	3,099,287.68
May	3,099,287.68	2,037.62	3,101,325.30
June	3,101,325.30	-	3,101,325.30
July	3,101,325.30	-	3,101,325.30
August	3,101,325.30	-	3,101,325.30
September	3,101,325.30	2,172,631	5,273,956.03
October	5,273,956.03		5,273,956.03
November	5,273,956.03		5,273,956.03
December	5,273,956.03	283,595	5,557,551.15
2023 January	5,557,551.15		5,557,551.15
February	5,557,551.15		5,557,551.15
March	5,557,551.15	179,222	5,736,773.57
April	5,736,773.57		5,736,773.57
May	5,736,773.57		5,736,773.57
June	5,736,773.57	178,944	5,915,717.19

Info:

Represents the deferral of costs associated with providing bill assistance (waiver of arrearages) to Oregon customers due to the COVID-19 pandemic by helping to reduce residential customer arrearages and bad debt write-offs (WUTC Docket U-200281).

b) Amortization Start Date/Anticipated Start Date: 3/1/2024
c) Expected Amortization Period: 1 Year

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 058

AWEC Data Request 058

Load Forecast / Allocation Factors - Please state the total loss factor (i.e., between load and sales) assumed when calculating Washington normalized kWh sales in this docket.

Response to AWEC Data Request 058

Loss factors are not used when calculating Washington normalized kilowatt-hour (kWh) sales in this general rate case (GRC) proceeding.

PREPARER: Lee Elder

SPONSOR: Robert M. Meredith

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 062

AWEC Data Request 062

Power Costs - Please provide coal supply work papers used to calculate the cost of coal included in NPC in PacifiCorp's initial filing.

Response to AWEC Data Request 062

Please refer to Confidential Attachment AWEC 062, which provides the requested coal supply work papers.

Note: Hunter coal costs and volumes in the attachment are provided on a total-plant basis. However, the Company has a shared ownership in the Hunter plant. To determine net power costs (NPC) for the Company's share of the plant, the Hunter coal costs and volumes are multiplied by 0.89466 to represent the Company's ownership share.

Designated information in Confidential Attachment AWEC 062 is confidential per Protective Order in UTC Docket UE-230172.

PREPARER: Dan Moody / Lori Oathes

SPONSOR: Ramon J. Mitchell

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 073

AWEC Data Request 073

Plant Retirements - Please provide a workpaper detailing the total expected contributions, earnings and withdrawals from the Bridger Coal Company reclamation sinking fund through the final closure date of the Bridger Coal Company.

Response to AWEC Data Request 073

Please refer to the Company's response to AWEC Data Request 062, specifically Confidential Attachment AWEC 062, confidential file "01 OpsCostSchedules CONF", tab "FR – Sinking Fund" which provides the reclamation trust contribution, earning, and withdrawal assumptions used in this general rate case (GRC) filing.

PREPARER: Dan Moody

SPONSOR: James Owen

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 074

AWEC Data Request 074

Plant Retirements - Please state the currently expected closure date of the Bridger Coal Company surface mine.

Response to AWEC Data Request 074

The Bridger Coal Company (BCC) surface mine is currently expected to close in 2029.

PREPARER: Dan Moody

SPONSOR: James Owen

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 076

AWEC Data Request 076

Plant Retirements - Please state when the Bridger Coal Company closed the underground mine.

Response to AWEC Data Request 076

The Bridger Coal Company (BCC) underground mine ceased coal production in November 2021, and the mine was sealed in December 2021.

PREPARER: Dan Moody

SPONSOR: James Owen

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 077

AWEC Data Request 077

Capital Additions - Please provide a detailed work plan for the capital costs associated with the North Temple office, including detail of each demolition and construction activity to be performed.

Response to AWEC Data Request 077

Inasmuch as Washington uses a historical test year with known and measurable updates, PacifiCorp has not yet developed detailed work plans for demolition of the North Temple Office (NTO).

PREPARER: Mike Jenson

SPONSOR: Jayson Branch

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 078

AWEC Data Request 078

Capital Additions - Please provide contractor plans and cost estimates for demolishing the North Temple Office.

Response to AWEC Data Request 078

Please refer to the Company's response to AWEC Data Request 077.

PREPARER: Mike Jenson

SPONSOR: Jayson Branch

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 080

AWEC Data Request 080

Capital Additions - Please provide any internal memoranda prepared which justify the decision to rebuild the North Temple Office.

Response to AWEC Data Request 080

The Company assumes that the Alliance of Western Energy Consumers (AWEC) are asking the Company to provide documentation regarding its decision to not rebuild the North Temple Office (NTO). Based on the foregoing assumption, the Company responds as follows:

The Company has no internal memoranda regarding its decision to not rebuild NTO, because the Company is not rebuilding the NTO.

However, if AWEC is requesting the Company to provide documentation regarding its decision to build a new headquarters, the Company responds as follows:

Please refer to the direct testimony of Company witness, Jayson Branch, specifically Exhibit PAC/JB-2-CRSA Life-Cycle Cost Analysis which provided the Company's internal memorandum. Please refer to Confidential Attachment AWEC 080, which provides additional internal memorandum that support the Company's decision to build a new headquarters.

Designated information in Confidential Attachment AWEC 080 is confidential per Protective Order in UTC Docket UE-230172

PREPARER: Mike Jenson

SPONSOR: Jayson Branch

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 082

AWEC Data Request 082

Capital Additions - Please specify any salvage proceeds expected with respect to the North Temple Office.

Response to AWEC Data Request 082

Please refer to the Company's response to AWEC Data Request 077.

PREPARER: Mike Jenson

SPONSOR: Jayson Branch

UE-230172 / PacifiCorp
September 6, 2023
AWEC Data Request 084

AWEC Data Request 084

Results of Operations - Please provide Washington FERC Account 454.1 pole attachment revenues by month over the period January 1, 2015 through July 31, 2023.

Response to AWEC Data Request 084

Please refer to Attachment AWEC 084 for the requested Washington allocated Federal Energy Regulatory Commission (FERC) 454.1, pole attachment revenues by month.

PREPARER: Craig Stelter

SPONSOR: Sherona L. Cheung

UE-230172 / PacifiCorp
September 11, 2023
AWEC Data Request 092

AWEC Data Request 092

Power costs - Please provide all Aurora and GRID model work papers used to establish final Net Power Costs approved in Docket UE-191024 (the 2020 GRC) and Docket UE-210402 (the 2021 PCORC), including the total-Company and Washington-allocated net power cost templates.

Response to AWEC Data Request 092

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

The Company assumes that the reference to “total-Company and Washington-allocated net power cost templates” refers to the standard net power costs (NPC) reports on a total-Company basis, and NPC reports, which have been adjusted to report NPC on a Washington-allocated basis respectively. The Company further clarifies that the NPC in the 2020 general rate case (GRC), Docket UE-191024, was performed using the Generation and Regulation Initiative Decision Tool (GRID), and that the NPC in the 2021 power cost only rate case (PCORC), Docket UE-210402, was performed using the Aurora model. Based on the foregoing assumption and clarifications, the Company replies as follows:

Referencing the 2020 GRC, please refer to Confidential Attachment AWEC 092-1, which provides the confidential work papers and total-Company and Washington-allocated NPC reports supporting the initial / direct testimony and confidential supplemental testimony of Company witness, Michael G. Wilding.

Note: A subsequent settlement adjustment was made to Purchased Power FERC Account 555NPC for (\$10,500,000) situs to Washington, which is not reflected in the files attached. Please refer to Attachment AWEC 092-2, which provides the restated Washington-allocated NPC.

Referencing the 2021 PCORC please refer to Confidential Attachment AWEC 092-3 and Highly Confidential Attachment AWEC 092-4.

Designated information in Confidential Attachment AWEC 092-1 and Confidential Attachment AWEC 092-3 are confidential per Protective Order in UTC Docket UE-230172.

Designated information in Highly Confidential Attachment AWEC 092-4 is highly confidential per Protective Order in UTC Docket UE-230172.