BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

V.

PACIFICORP DBA PACIFIC POWER & LIGHT COMPANY,

Respondent.

Docket UE-210402

PACIFICORP’S MOTION TO ALLOW SUPPLEMENTAL TESTIMONY

I. INTRODUCTION

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 June 1, 2021, with the Supplemental Testimony of Douglas R. Staples providing additional information regarding PacifiCorp’s proposed Nodal Pricing Model and the transition to Aurora for modeling net power costs.

II. PROCEDURAL BACKGROUND

On June 1, 2021, PacifiCorp filed a power cost only rate case (PCORC), including the direct testimony of Mr. Staples, which among other issues, supported PacifiCorp’s forecast net power costs. On June 25, 2021, the Washington Utilities and Transportation Commission (Commission) issued a Pre-Hearing Conference Order that set a procedural schedule.

III. PACIFICORP’S MOTION

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 additional information.
regarding PacifiCorp’s proposed Nodal Pricing Model and the transition to Aurora for modeling net power costs.

PacifiCorp, through this PCORC has switched from the Generation and Regulation Initiative Decision (GRID) model to the Aurora model for forecasting and setting the net power cost (NPC) baseline. Through workshops, discovery, and conversations with the staff of the Commission, Alliance of Western Energy Consumers, Public Counsel, Wal-Mart, and the Energy Project, these parties have requested supplemental testimony on certain topics related to Aurora and the proposed Nodal Pricing Model. As provided in the attached testimony, the Nodal Pricing Model is a framework issues in PacifiCorp’s ongoing multi-state process (MSP) inter-jurisdictional allocation settlement discussions. Additionally, this testimony provides additional information on the process that was used by PacifiCorp to develop the Aurora model. This testimony provides additional support and detail for PacifiCorp’s proposed baseline NPC, and helps establish a more robust record for the Commission in this proceeding. Therefore, PacifiCorp requests that the Commission grant this motion.

Respectfully submitted this 3rd day of September, 2021.

/s/
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