

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

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

Petitioner,

2022 Power Cost Adjustment Mechanism
Annual Report.

DOCKET UE-230482

**EXHIBIT BGM-5
CONFIDENTIAL RESPONSES TO DATA REQUESTS
(REDACTED VERSION)**

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 007

AWEC Data Request 007

Please provide each To-Expiry Value-at-Risk calculation performed over the period January 1, 2019 through May 31, 2023 for purposes of establishing power and gas hedging limits and provide the associated power and gas hedging limits established based upon those calculations. Please provide all work papers used to perform these calculations with all formulas and links intact. Please detail the limits on a monthly basis over the forward period, with separate detail for the east and west side of PacifiCorp's system.

Confidential Response to AWEC Data Request 007

The Company objects to this request which requests information related to periods that are outside the scope of this calendar year 2022 power cost adjustment mechanism (PCAM). Data and information beyond calendar year 2022 is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Without waiving the foregoing objection, the Company responds as follows:

PacifiCorp's hedging program changed as of July 1, 2021. To-Expiry Value-at-Risk (TEVaR) reporting is no longer produced and no longer relevant in the new hedging program after June 30, 2021.

Please refer to Confidential Attachment AWEC 007 which provides copies of PacifiCorp's TEVaR calculations and daily data (confidential files "06-30-2021 Hedge Book" and "Model – TEVaR – All"). These files create the TEVaR report (confidential file "06-30-2021 TEVaR"). These calculations and reports are as of the last TEVaR report on June 30, 2021 and include the full power and natural gas hedging limits history since inception to conclusion of the TEVaR program, including the period January 1, 2019 through June 30, 2021. **[CONFIDENTIAL**

BEGINS

[CONFIDENTIAL ENDS]

Confidential information is provided subject to a confidentiality agreement executed between PacifiCorp and the Alliance of Western Energy Consumers (AWEC).

PREPARER: Cheryle Guest / David Rubenstein

SPONSOR: John Fritz

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 008

AWEC Data Request 008

For each month over the period July 1, 2021 through May 31, 2023, please provide PacifiCorp's forecast natural gas hedging volume limits, including both the minimum and maximum hedging limits, as well as the underlying requirements against which said limits were calculated. Please provide the hedging volume limits calculated as of the 15th day of each month, or the nearest time available thereto. For each monthly calculation, please provide detail of the limits and requirements specified on a monthly basis over the forward period. Please also detail the limits separately for the east and west side of PacifiCorp's system.

Confidential Response to AWEC Data Request 008

The Company objects to this request which requests information related to periods that are outside the scope of this calendar year 2022 power cost adjustment mechanism (PCAM). Data and information beyond calendar year 2022 is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Without waiving the foregoing objection, the Company responds as follows:

Natural gas hedging limits are prepared daily by PacifiCorp's middle office and risk management groups. For PacifiCorp to respond to this data request as written would require the Company to provide nearly 400 spreadsheets for trading days over the period July 1, 2021, through May 31, 2023. Please refer to Confidential Attachment AWEC 008-1 which provides copies of PacifiCorp's Physical Position Reports and Position Calculators for May 31, 2023, and each quarter-end beginning Q3 2021 through Q2 2023. In addition, please refer to Confidential Attachment AWEC 008-2 which provides copies of PacifiCorp's daily Position and Limits Summary emails sent to traders for each of those days' files.

[CONFIDENTIAL BEGINS]

[CONFIDENTIAL ENDS].

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PREPARER: Cheryle Guest / David Rubenstein

SPONSOR: John Fritz

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 009

AWEC Data Request 009

To the extent not already provided in a prior request, please provide calculations and work papers supporting PacifiCorp's power hedging limits and requirements calculated over the period July 1, 2021 through May 31, 2023. Please detail the limits and requirements on a monthly basis over the forward period, with separate detail for the east and west side of PacifiCorp's system.

Confidential Response to AWEC Data Request 009

The Company assumes that the reference to "prior request" is intended to be a reference to AWEC Data Request 008. Based on the foregoing assumption, the Company responds as follows:

The Company objects to this request which requests information related to periods that are outside the scope of this calendar year 2022 power cost adjustment mechanism (PCAM). Data and information beyond calendar year 2022 is not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Without waiving the foregoing objection, the Company responds as follows:

Power hedging limits are prepared daily by PacifiCorp's middle office and risk management groups. For PacifiCorp to respond to this data request as written would require the Company to provide nearly 400 spreadsheets for trading days over the period July 1, 2021 through May 31, 2023. Please refer to the Company's response to AWEC Data Request 008, specifically Confidential Attachment AWEC 008-1, which provides copies of PacifiCorp's daily Physical Position Reports and Position Calculators for May 31, 2023, and each quarter-end beginning Q3-2021 through Q2-2023. Please refer to the Company's response to AWEC Data Request 008, specifically Confidential Attachment AWEC 008-2, which provides copies of PacifiCorp's daily Position and Limits Summary emails sent to traders for each of those days' files. **[CONFIDENTIAL BEGINS]** [REDACTED]

[CONFIDENTIAL ENDS].

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PREPARER: Cheryle Guest / David Rubenstein

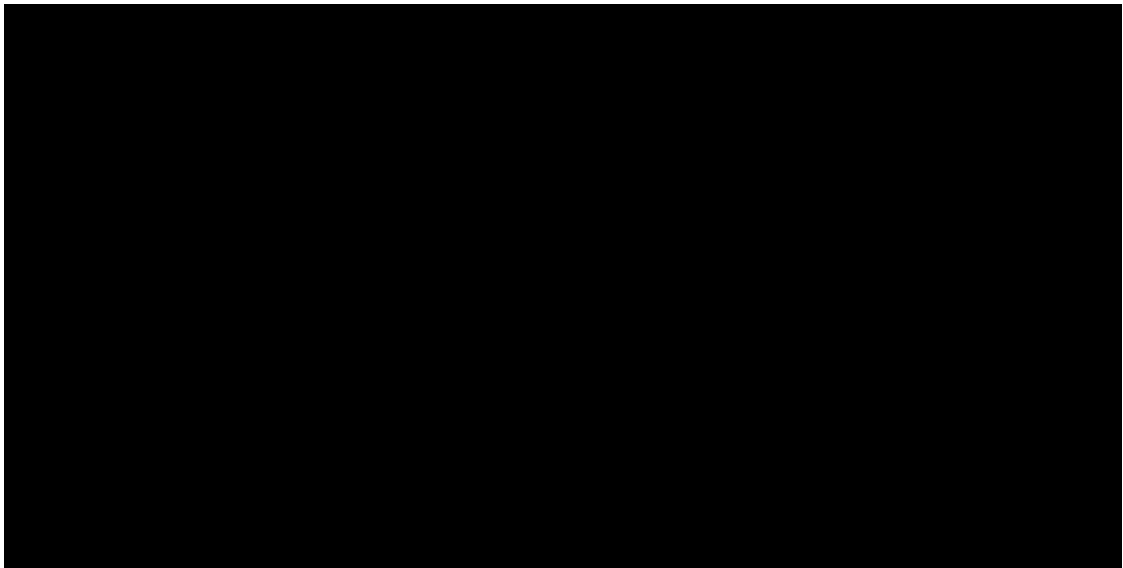
SPONSOR: John Fritz

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 041

AWEC Data Request 041

CONFIDENTIAL REQUEST - Reference PacifiCorp's response to AWEC Data Request 2, Confidential Attachment "Risk Management Policy_20220303 CONF," Appendix E:

[CONFIDENTIAL BEGINS]



[CONFIDENTIAL ENDS]

Confidential Response to AWEC Data Request 041

The Company assumes that the reference to "AWEC Data Request 2, Confidential Attachment" is intended to be a reference to the Company's response to AWEC Data Request 002 and Confidential Attachment AWEC 002. Based on the foregoing assumption, the Company responds as follows:

(a) **[CONFIDENTIAL BEGINS]** [REDACTED]
[REDACTED] **[CONFIDENTIAL ENDS]**.

(b) **[CONFIDENTIAL BEGINS]** [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[CONFIDENTIAL ENDS].

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(c) **[CONFIDENTIAL BEGINS]** [REDACTED]
[REDACTED] **[CONFIDENTIAL ENDS]**.

Confidential information is provided subject to the protective order that was issued in this proceeding.

PREPARER: David Rubenstein

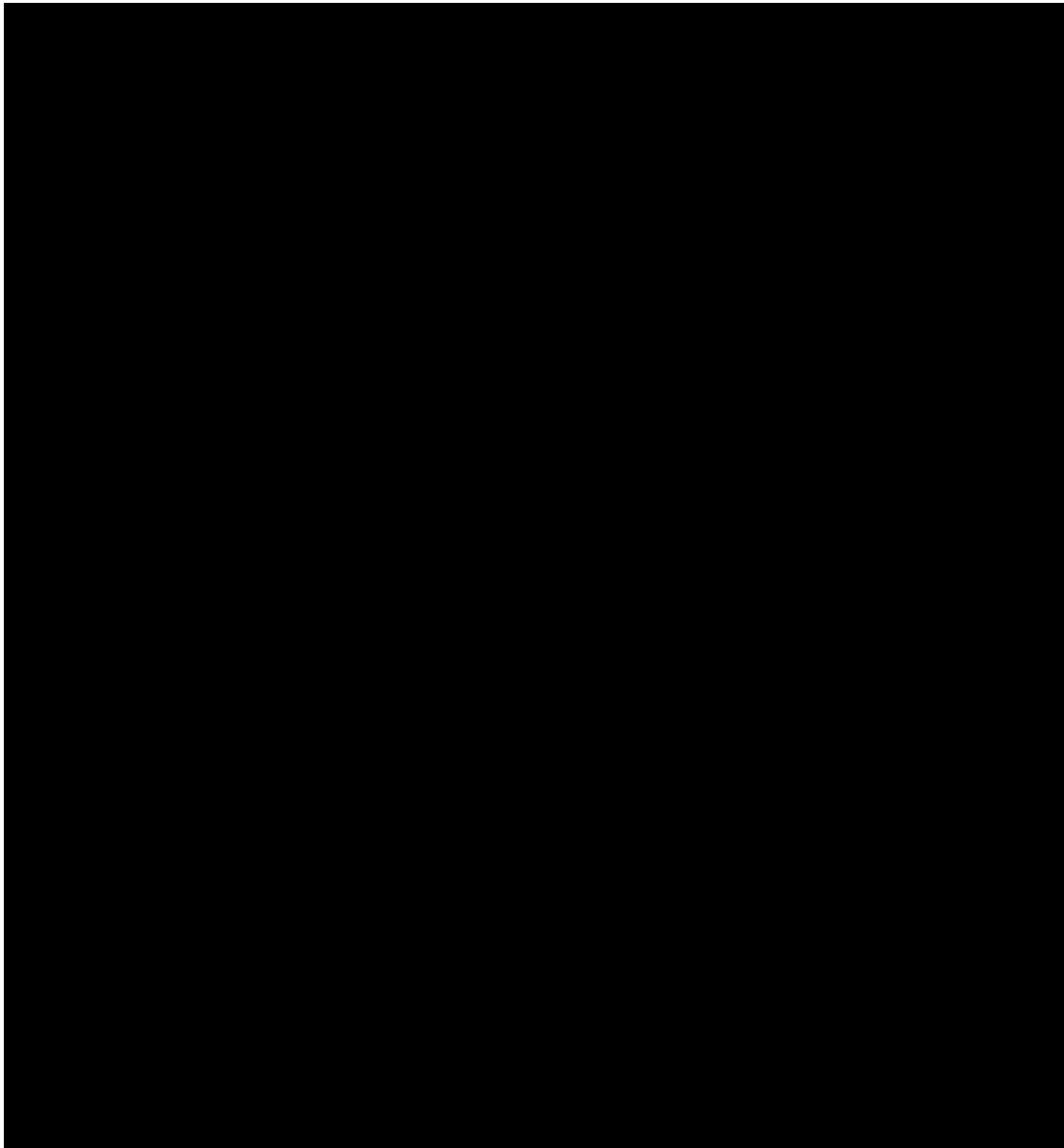
SPONSOR: John Fritz

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 043

AWEC Data Request 043

CONFIDENTIAL REQUEST - Reference PacifiCorp's response to AWEC Data Request 8, Attach AWEC 008-1 CONF, "2021-09-30 Position Calculator CONF", tab "Gas Burn":

[CONFIDENTIAL BEGINS]

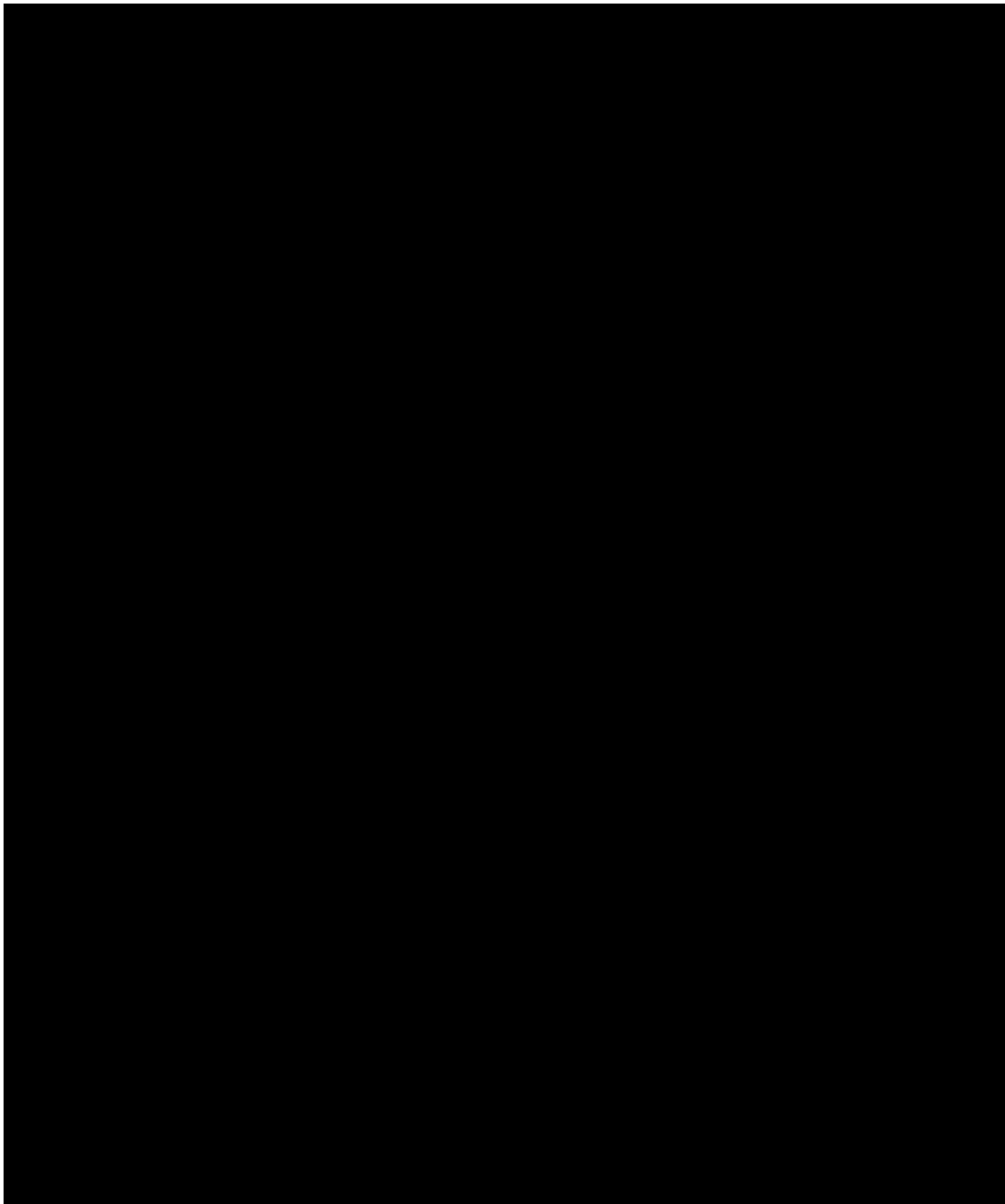


[CONFIDENTIAL ENDS]

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 043

Confidential Response to AWEC Data Request 043

The Company assumes that the references to “AWEC Data Request 8” and “AWEC Data Request 27” are intended to be references to the Company’s response to AWEC Data Request 008 and AWEC Data Request 027. Further, the Company clarifies that the deferral period in this 2022 power cost adjustment mechanism (PCAM) is calendar year 2022. Based on the foregoing assumptions and clarification, the Company responds as follows:



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AWEC Data Request 043

Confidential information is provided subject to the protective order that was issued in this proceeding.

PREPARER: David Rubenstein

SPONSOR: John Fritz

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 045

AWEC Data Request 045

Please provide an overview of the solicitation process through which PacifiCorp reviews and selects hedging products, following its determination that it is necessary to execute such a hedging transaction.

Confidential Response to AWEC Data Request 045

The Company assumes that the request for “hedging products” is requesting information regarding natural gas hedging products. Based on the foregoing assumption, the Company responds as follows:

[CONFIDENTIAL BEGINS] [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[CONFIDENTIAL ENDS].

Confidential information is provided subject to the protective order that was issued in this proceeding.

PREPARER: Stephen Fendrich / Paul Wood

SPONSOR: Paul Wood

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 052

AWEC Data Request 052

For each natural gas power plant in the Deferral Period, please specify the percentage of PacifiCorp’s physical gas requirements that were:

- (a) served through gas priced at the First of Month (FOM);
- (b) served through gas priced at the Platt's Gas Daily or some other daily index;
and
- (c) served through gas priced using some other index or pricing.

Confidential Response to AWEC Data Request 052

The Company clarifies that the deferral period in this 2022 power cost adjustment mechanism (PCAM) is calendar year 2022. The Company further clarifies that only the Chehalis and Hermiston plants are relevant to this 2022 PCAM proceeding pursuant to the Washington Inter-Jurisdictional Allocation Methodology (WIJAM). Based on the foregoing clarifications, the Company responds as follows:

[CONFIDENTIAL BEGINS]

PLANT	First of Month (FOM)	Gas Daily Index	Fixed Price
Chehalis	██████	██████	██████
Hermiston	██████	██████	██████

[CONFIDENTIAL ENDS]

Confidential information is provided subject to the protective order that was issued in this proceeding.

PREPARER: Ray Zacharia / David Rubenstein

SPONSOR: To Be Determined