

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKET UE-210402

JOINT MOTION TO MODIFY
PROCEDURAL SCHEDULE

I. INTRODUCTION

1 Pursuant to WAC 480-07-375(1)(b), the regulatory staff (Staff) of the Washington
Utilities and Transportation Commission (Commission) and Pacific Power & Light
Company (PacifiCorp or Company) jointly move to amend the procedural schedule
established by Order 03 in this docket.

2 On July 3, 2021, the parties participated in a workshop established in Order 03. As a
result of the workshop, the Company and the parties agreed that supplemental testimony
should be filed related to certain topics pertaining to Auroa and the Company's proposed
Nodal Pricing Model. On September 10, 2021, the Commission granted the Company's
motion to allow supplemental testimony. Staff and the Company move the Commission to
amend the procedural schedule to allow additional time to provide the Commission a more
robust record on matters within this case, including those addressed in supplemental
testimony.

3 Specifically, Staff and the Company request to extend the deadline for the
submission of response testimony from September 20, 2021 to November 9, 2021, the

deadline for rebuttal and cross-answering testimony from October 29, 2021 to December 17, 2021, the discovery cutoff date from November 16, 2021 to January 5, 2022, the date to file cross-examination exhibits, witness lists, errata sheets, and email cross-examination time estimates to the presiding ALJ from November 23, 2021 to either January 7 or 12, 2022,¹ the hearing from December 3, 2021 to January 14 or 19, 2022, the date for simultaneous post-hearing briefs from December 12, 2021 to February 11, 2022, the date for simultaneous reply briefs from December 23, 2021 to February 25, 2022, and the requested Final Order date from February 1, 2022 to April 8, 2022.

4 Appendix A to this motion contains Staff and the Company’s proposed modified procedural schedule.

5 All parties to the proceeding support the proposed modifications to the procedural schedule.

II. RELIEF REQUESTED

6 Pursuant to WAC 480-07-375(1)(b), Staff and the Company request that the Commission accept its proposed modifications to the procedural schedule in this docket.

III. STATEMENT OF FACTS

7 On June 1, 2021, Pacific Power filed a power cost only rate case (“PCORC”) in this docket. This filing was made pursuant to the revised and amended settlement stipulation approved by the Commission in UE-191024, which stated that “PacifiCorp will file a Power Cost Only Rate (PCORC) in 2021 to update its net power cost (NPC) baseline to reflect

¹ The date for these prehearing filings is intended to be a week before the hearing date. The two options presented are intended to correspond to the two options for a hearing date.

day-ahead dispatch expected to occur beginning January 2021.”² The settlement stipulation further stated that “the NPC baseline will be updated based on a nodal dispatch through a PCORC filed in 2021.”³

8 On June 25, 2021, the Commission entered a prehearing conference order in this docket.

9 On July 3, 2021, the parties participated in a workshop established in Order 03. As a result of the workshop, the non-company parties requested that supplemental testimony be filed on certain topics related to the Company’s switch from the Generation and Regulation Initiative Decision (GRID) to the Aurora for forecasting and setting the NPC baseline and the Company’s proposed Nodal Price Model. On September 3, 2021, Pacific Power filed a motion to allow supplemental testimony along with the supplemental testimony and exhibits. On September 10, 2021, the Commission granted the Company’s motion to allow supplemental testimony. On September 7, 2021, the Company and several of the non-company parties participated in an additional analyst workshop pertaining to the supplemental testimony filed to the docket.

10 The parties to this proceeding attended the settlement conference scheduled in the prehearing conference order on September 1, 2021 as well as an additional settlement conference on September 21, 2021. No settlement was reached in these meetings.

² *WUTC v. Pacific Power & Light Co.p*, Docket No. UE-191024, Revised and Amended Settlement Stipulation at ¶11 (Nov. 6, 2021).

³ *Id.* at ¶ 17.

IV. STATEMENT OF ISSUES

11 Whether the Commission should modify the procedural schedule it established in
Order 03.

VI. ARGUMENT

12 The Commission’s procedural rules allow parties to move for “commission action in
the context of an adjudicative proceeding.”⁴ This action can include the modification of “the
procedural schedule in a proceeding.”⁵

13 The Commission should find good cause to modify the procedural schedule in this
docket. PacifiCorp has transitioned from GRID to Auora for modeling net power costs and
developing the NPC baseline. This PCORC represents the first time that parties are
reviewing an NPC baseline for PacifiCorp which was developed using the Aurora software.
With the deadline for rebuttal testimony rapidly approaching, parties focused their efforts on
reviewing the recently filed supplemental testimony and pursuing settlement negotiations, and
additional time is now necessary to provide the Commission a robust record for a litigated
proceeding. Staff and the Company have had discussions with all the Parties in this
proceeding, and all parties believe these modifications to the procedural schedule will help
provide a better record for the Commission on the complex and important issues presented
in this case.

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⁴ WAC 480-07-375(1).

⁵ WAC 480-07-375(1)(b).

VII. CONCLUSION

Staff and the Company request that the Commission grant its motion and modify the procedural schedule as described above.

DATED this 23rd day of September 2021.

Respectfully submitted,

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APPENDIX A

[PROPOSED] MODIFIED PROCEDURAL SCHEDULE DOCKET

UE-210402

EVENT	DATE
Tariff Filing	June 1, 2021
Tariffs suspended and discovery commenced	June 16, 2021
Prehearing Conference	June 24, 2021
Workshop (parties only)	July 20, 2021
Settlement Conference (parties only)	September 1, 2021
Supplemental Testimony	September 3, 2021
Response Testimony	November 9, 2021¹
Notices Issued for Public Comment Hearings	30 days prior to Public Comment Hearings
Public Comment Hearing	November 18, 2021 @ 6:00 pm
Rebuttal/Cross Answering Testimony	December 17, 2021
Discovery Cutoff	January 5, 2022
File Cross Examination Exhibits, Witness Lists, and Errata sheets, and email Cross-Examination Time Estimates to the presiding ALJ	January 7/12, 2022
Hearing	January 14/19, 2022
Simultaneous Post-hearing Briefs	February 11, 2022
Simultaneous Reply Briefs	February 25, 2022
Requested Final Order Date	On or before April 8, 2022

¹ After the filing of Response Testimony, the response time for data requests is five days based on the best efforts of the Parties.