

**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-4

NON-CONFIDENTIAL RESPONSES TO DATA REQUESTS

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 002

AWEC Data Request 002

Please provide each version of, and/or revision to, PacifiCorp's Energy Risk Management Policy documents in effect from January 1, 2019 through May 31, 2023.

Response to AWEC Data Request 002

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. Notwithstanding the foregoing objection, the Company responds as follows:

Please refer to Confidential Attachment AWEC 002. Note: the current PacifiCorp Energy Risk Management Policy was approved April 17, 2023.

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 003

AWEC Data Request 003

Please provide each version of, and/or revision to, Energy Supply Management (ESM) Front Office Procedures documents in effect from January 1, 2019 through May 31, 2023.

Response to AWEC Data Request 003

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:

Please refer to Confidential Attachment AWEC 003. Note: the current PacifiCorp's Energy Supply Management (ESM) Front Office Procedures was approved December 22, 2021.

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

PREPARER: Paul Wood

SPONSOR: Paul Wood

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 004

AWEC Data Request 004

Please provide each version of, and/or revision to, PacifiCorp's Energy Risk Management Policy documents in effect from January 1, 2019 through May 31, 2023.

Response to AWEC Data Request 004

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:

Please refer to the Company's response to AWEC Data Request 002.

PREPARER: Cheryle Guest / David Rubenstein

SPONSOR: John Fritz

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 006

AWEC Data Request 006

Please provide all presentations or documents submitted or provided to the Washington Commission, Commission Staff, or an intervenor group in the past five years regarding PacifiCorp's hedging policies and procedures.

Response to AWEC Data Request 006

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

Please refer to Confidential Attachment AWEC 006 which provides copies of the Company's hedging presentations to the Washington Utilities and Transportation Commission (WUTC) during 2018 through 2022.

In addition, please refer to the Company's responses to AWEC Data Request 002 through AWEC Data Request 005 which provides copies of the Company's policy documents.

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 / Paul Wood

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 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.

[REDACTED]

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 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. [REDACTED]

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 010

AWEC Data Request 010

Please provide PacifiCorp's actual Net Power Costs over the period 2016 through 2022. Please provide all work papers used to calculate actual net power costs, including the underlying monthly fuel reports and FERC reporting database (formerly TORIS). If a map is necessary to assign database entries or fuel items to the lines in the actual net power cost report, please provide a copy of the spreadsheet used to map the data.

Response to AWEC Data Request 010

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:

Please refer to Attachment AWEC 010-1 which provides total-Company actual net power costs (NPC) reports for 2016 through 2022.

Please refer to Confidential Attachment AWEC 010-2 which provides the total-Company actual NPC database entries, along with their mapping and fuel supply cost calculations for 2016 through 2022.

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

PREPARER: Jack Painter

SPONSOR: Jack Painter

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 014

AWEC Data Request 014

Please provide all minimum filing requirements submitted from Wyoming Docket No. 20000-642-EM-23, the Wyoming 2023 ECAM for Net Power Costs incurred in calendar year 2022. Please provide all confidential and non-confidential versions of the referenced files, with all formulas and links intact, including the following:

- (a) ECAM Minimum Filing Requirement 1- Please provide all short-term firm (STF) transactions.
- (b) ECAM Minimum Filing Requirement 2- Please provide actual market prices for the period for all energy trading markets in which PacifiCorp participated.
- (c) ECAM Minimum Filing Requirement 3 - Please provide actual natural gas market prices and any natural gas contracts executed.
- (d) ECAM Minimum Filing Requirement 4 - Please provide new or modified contracts for long-term firm (LTF) power purchases or sales.
- (e) ECAM Minimum Filing Requirement 5 - Please provide a summary of terms and prices for any new or modified coal contract.
- (f) ECAM Minimum Filing Requirement 6 - To the extent included in energy cost adjustment mechanism (ECAM), please provide all monthly California Independent System Operator (CAISO) service charges and fees.
- (g) ECAM Minimum Filing Requirement 8 - Please provide actual monthly wheeling expenses and revenues.
- (h) ECAM Minimum Filing Requirement 13- (a) Please provide coal and wind generating plant operations data including availability, capacity factor, equivalent forced outage rate (EFOR), and hourly generation; and (b) Please provide the North American Electric Reliability Corporation (NERC) / Generating Availability Data System (GADS) Industry Average of forced outages due to human error for the Company's owned thermal generation units. [WY Order 20000-472-EA-15 / ordered paragraph 3, page 11 / format consistent with OCA Data Request 2.1 in Docket 20000-492-EA-16].

Response to AWEC Data Request 014

The Company objects to this request as outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible information. Without waiving the foregoing objection, the Company responds as follows:

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October 23, 2023
AWEC Data Request 014

Please refer to Attachment AWEC 014-1 and Confidential Attachment AWEC 0142-2 which provide copies of the Company's responses and attachments to the ECAM Minimum Filing Requirements (MFR) in PacifiCorp's Energy Cost Adjustment Mechanism (ECAM) proceeding before the Wyoming Public Service Commission (WPSC) for deferral period calendar year 2022, Docket 20000-642-EM-23. Specifically as listed below:

Wyoming ECAM MFR 1
Wyoming ECAM MFR 2
Wyoming ECAM MFR 3
Wyoming ECAM MFR 4
Wyoming ECAM MFR 5
Wyoming ECAM MFR 6
Wyoming ECAM MFR 8
Wyoming ECAM MFR 13

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

PREPARER: Not Applicable

SPONSOR: Not Applicable

UE-230482 / PacifiCorp
October 23, 2023
AWEC Data Request 027

AWEC Data Request 027

Please provide actual quantity of natural gas consumed MMBtus in the manner identified in EBA AFR 20.

Response to AWEC Data Request 027

The Company objects to this request as outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible information. Without waiving the foregoing objection, the Company responds as follows:

Please refer to Confidential Attachment AWEC 027.

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

PREPARER: John Akiyama

SPONSOR: Jack Painter

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:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

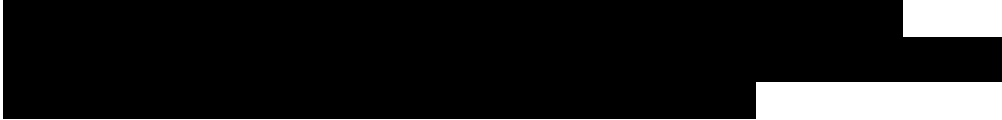
Confidential Response to AWEC Data Request 041

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) [REDACTED]

(b) [REDACTED]

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AWEC Data Request 041

(c) 

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":

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

UE-230482 / PacifiCorp
March 19, 2024
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 044

AWEC Data Request 044

Reference PacifiCorp's response to AWEC Data Request 2: Please provide any new versions of, and/or revisions to, PacifiCorp's Energy Risk Management Policy documents from May 31, 2023, to the present and explain the nature and reasons for the changes made.

Response to AWEC Data Request 044

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

The Company objects to this request which asks for 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. Notwithstanding the foregoing objection, the Company responds as follows:

Please refer to the Company's response to AWEC Data Request 002. There is nothing additional to provide.

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 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 046

AWEC Data Request 046

Reference PacifiCorp's response to AWEC Data Request 14, Attachment "WY 20000-642-EM-23 Attach ECAM MFR 3-3 CONF":

- (a) For each transaction listed in the referenced work paper, please state whether the transaction was executed on or through the Intercontinental Exchange (ICE) Platform, and if so, the specific ICE product that was transacted.
- (b) If the transaction was not executed through ICE, please specify the specific market or trading platform through which the transaction was executed, and the associated product description.

Response to AWEC Data Request 046

The Company assumes that the reference to "AWEC Data Request 14" is intended to be a reference to the Company's response to AWEC Data Request 014. The Company further clarifies that the referenced file "Attach ECAM MFR 3-3 CONF," which was provided in the Company's 2023 Wyoming energy cost adjustment mechanism (ECAM) for calendar year 2022, provides data on all financial natural gas transactions that were settled in calendar year 2022. Based on the foregoing assumption and clarification, the Company responds as follows:

- (a) All natural gas financial swaps were executed directly with counterparties. No financial hedges were executed on the InterContinental Exchange (ICE).
- (b) Please refer to the Company's response to subpart (a) above.

PREPARER: Stephen Fendrich

SPONSOR: Stephen Fendrich / Paul Wood

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 049

AWEC Data Request 049

Reference PacifiCorp’s response to AWEC Data Request 14, Attachment “WY 20000-642-EM-23 Attach ECAM MFR 3-3 CONF”: For each Index code in the referenced work paper, please identify the specific market index, with a reference to the index publication, against which the transactions in the referenced work paper are settled.

Response to AWEC Data Request 049

The Company assumes that the reference to “AWEC Data Request 14” is intended to be a reference to the Company’s response to AWEC Data Request 014. The Company further clarifies that the referenced file “Attach ECAM MFR 3-3 CONF”, which was provided in the Company’s 2023 Wyoming energy cost adjustment mechanism (ECAM) for calendar year 2022, provides data on all financial natural gas transactions that were settled in calendar year 2022. Based on the foregoing assumption and clarification, the Company responds as follows:

Please refer to the table below which provides index names in the referenced file “Attach ECAM MFR 3-3 CONF” together with their corresponding “Platts Inside FERC FOM” index. Note: “ROCKIES MKT10” uses the same index publication as “NWPL_ROX” for settlement.

Spreadsheet Index Name	Platts IF Index Name	Platts IF Index Code
NWPL_CAD	Northwest, Canadian border (Sumas)	IGBCT03
NWPL_ROX	Northwest, Rocky Mountains	IGBCP03
ROCKIES MKT10	Northwest, Rocky Mountains	IGBCP03

PREPARER: David Rubenstein

SPONSOR: John Fritz

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 050

AWEC Data Request 050

Please provide historical First of Month (FOM), Platts Inside FERC Gas Market Report, first of month publication, index prices for Sumas and Rockies gas over the period January 2019 through March 2024. To the extent that any of the transactions in AWEC Data Request 14, Attachment “WY 20000-642-EM-23 Attach ECAM MFR 3-3 CONF” are settled against a different index publication, please provide that published index price as well.

Response to AWEC Data Request 050

PacifiCorp objects to this request as outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding the foregoing objection, the Company responds as follows:

The Company assumes that the reference to “AWEC Data Request 14” is intended to be a reference to the Company’s response to AWEC Data Request 014. The Company further clarifies that the referenced file “Attach ECAM MFR 3-3 CONF,” which was provided in the Company’s 2023 Wyoming energy cost adjustment mechanism (ECAM) for calendar year 2022, provides data on all financial natural gas transactions that were settled in calendar year 2022. Based on the foregoing assumption and clarification, the Company responds as follows:

The requested information is confidential and proprietary third party data which is the property of Platts / S&P Global Platts (Platts). Under the subscription arrangements that the Company has with Platts for its market price data services, the Company is restricted from providing Platts’ data to third parties. The Company and Platts have procedures established whereby a third party, (in this instance, the Alliance of Western Energy Consumers’ (AWEC)), are able to request specific (and relevant to the proceeding) market price data directly from Platts. Please refer to Attachment AWEC 050.

PREPARER: David Rubenstein

SPONSOR: John Fritz

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 051

AWEC Data Request 051

Please provide the Platts Gas Daily market prices over the period January 1, 2019, through the most recent trade day available.

Response to AWEC Data Request 051

PacifiCorp objects to this request as outside the scope of this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding the foregoing objection, the Company responds as follows:

The requested information is confidential and proprietary third party data which is the property of Platts / S&P Global Platts (Platts). Under the subscription arrangements that the Company has with Platts for its market price data services, the Company is restricted from providing Platts' data to third parties. The Company and Platts have procedures established whereby a third party, (in this instance, the Alliance of Western Energy Consumers' (AWEC)), are able to request specific (and relevant to the proceeding) market price data directly from Platts. Please refer to the Company's response to AWEC Data Request 050, specifically Attachment AWEC 050. During January 1, 2019 through February 2023, the Company transacted at the following Platts markets:

- CIG, Rockies,
- GTN, Kingsgate,
- Questar, Rockies,
- White River Hub,
- N W, Wyo. Pool,
- Stanfield, Ore.
- NW, Can. Bdr. (Sumas),
- Kern River Opal.

PREPARER: David Rubenstein

SPONSOR: John Fritz

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:

[REDACTED]

PLANT	First of Month (FOM)	Gas Daily Index	Fixed Price
Chehalis	[REDACTED]		
Hermiston	[REDACTED]		

[REDACTED]

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

PREPARER: Ray Zacharia / David Rubenstein

SPONSOR: To Be Determined

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 054

AWEC Data Request 054

Reference PacifiCorp's Response to AWEC Data Request 8: Please provide an overview of the dispatch model, and its associated model logic, that is used to forecast natural gas requirements in the spreadsheets provided in response to the referenced data request.

Response to AWEC Data Request 054

The Company assumes that the reference to "AWEC Data Request 8" is intended to be a reference to the Company's response to AWEC Data Request 008. Based on the foregoing assumption, the Company responds as follows:

The PCI Energy Solutions (formerly Power Costs Incorporated) (PCI) optimization model is a tool used for determining least-cost system dispatch to serve system obligations. The model takes into account all the available generators unit characteristics (Pmax, Pmin, ramp rate, fuel costs, start-up costs, etc.), system obligations (system load, bilateral transactions, reserve requirements, etc.) and transmission limits. The model's outputs are used for calculating forward power and natural gas positions.

For further information, please refer to PCI's website:

<https://www.powercosts.com/solutions/optimization-analytics/asset-optimization/>

PREPARER: David Rubenstein

SPONSOR: John Fritz

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 057

AWEC Data Request 057

Reference PacifiCorp's Response to AWEC Data Request 10: Please explain how gas swaps are allocated to individual power plants in the 2022 Actual NPC and explain why PacifiCorp believes its method is appropriate.

Response to AWEC Data Request 057

The Company assumes that the reference to "AWEC Data Request 10" is intended to be a reference to AWEC Data Request 010. Based on the foregoing assumption, the Company responds as follows:

Allocations for natural gas swap transactions, pipeline expenses and other costs to individual natural gas power plants are performed within PacifiCorp's ENDUR system. Please refer to Confidential Attachment AWEC 057 which provides the allocation methodology for how ENDUR allocates to individual plants and units.

PacifiCorp believes that the allocation methodology the is used to allocate natural gas swaps (financial allocations) is appropriate since natural gas swaps are only used to hedge natural gas supply (physical allocations), and natural gas supply is allocated in a similar manner.

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

PREPARER: John Akiyama

SPONSOR: John Akiyama / Doug Young

UE-230482 / PacifiCorp
March 19, 2024
AWEC Data Request 058

AWEC Data Request 058

Please provide the final NPC reports (including both the total-Company NPC report, as well as the Washington Allocated NPC report) from the Washington 2021 general rate case (GRC), Docket UE-191024 and the Washington 2021 power cost only rate case (PCORC), Docket UE-210402, respectively.

Response to AWEC Data Request 058

Please refer to Confidential Attachment AWEC 058 which provides final net power costs (NPC) reports (including both the Total Company NPC report, as well as the Washington allocated NPC reports) from the Washington 2021 general rate case (GRC), Docket UE-191024 and the Washington 2021 power cost only rate case (PCORC), Docket UE-210402.

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

PREPARER: Isaiah Zacharia

SPONSOR: Ramon Mitchell