

**ATTACHMENT 2**

**to**

**PacifiCorp's Response to  
Staff's Motion to Compel Discovery**



825 NE Multnomah, Suite 2000  
Portland, Oregon 97232

October 5, 2023

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RE: **WA UE-230172**  
WUTC Data Request (150-157)

Please find enclosed PacifiCorp's 1<sup>st</sup> Supplemental Responses to WUTC Data Requests 152, 154, 155, 156, and 157.

If you have any questions, please call me at 503-813-5410.

Sincerely,

          /s/            
Ariel Son  
Regulatory Affairs Manager

C.c.: Service List

UE-230172 / PacifiCorp  
October 5, 2023  
WUTC Data Request 152 1<sup>st</sup> Supplemental

### **WUTC Data Request 152**

**Power Costs** - Please state whether PacifiCorp agrees that there is an information asymmetry between itself and intervening parties as described in Exh. RLE-1CT at 8-9.

- (a) If not, please explain the basis for PacifiCorp's belief that all parties have equal access to information and opportunity to understand that information?
- (b) If PacifiCorp agrees there is an information asymmetry, then assuming some form cost sharing for NPC variance is retained for PacifiCorp, is it reasonable to maintain asymmetry in the design of sharing bands for NPC?

### **1<sup>st</sup> Supplemental Response to WUTC Data Request 152**

Further to the Company's response to WUTC Data Request 152 dated October 2, 2023, and without waiving the objections identified in that previous response, the Company provides the following additional response:

PacifiCorp is currently actively reviewing and analyzing intervenor testimony and developing a position that will be provided in the Company's Rebuttal Testimony on October 27, 2023. PacifiCorp will supplement these responses after providing rebuttal testimony.

PREPARER: Counsel

SPONSOR: Counsel

UE-230172 / PacifiCorp  
October 5, 2023  
WUTC Data Request 154 1<sup>st</sup> Supplemental

### **WUTC Data Request 154**

**Power Costs** - Please explain why it is reasonable to forecast Rate Year 1 NPC based on Aurora model data for calendar year 2024. In your response, please address the forecast January – April outage of Jim Bridger 1 and 2.

- (a) Since the suspension date for Rate Year 1 is March 19, 2024, is it reasonable to assume that RY1 rates will go into effect on April 1, 2024 given the time required for PacifiCorp to file compliant tariffs and for the Commission to review them?

### **1<sup>st</sup> Supplemental Response to WUTC Data Request 154**

Further to the Company's response to WUTC Data Request 154 dated October 2, 2023, and without waiving the objections identified in that previous response, the Company provides the following additional response:

PacifiCorp is currently actively reviewing and analyzing intervenor testimony and developing a position that will be provided in the Company's Rebuttal Testimony on October 27, 2023. PacifiCorp will supplement these responses after providing rebuttal testimony.

PREPARER: Counsel

SPONSOR: Counsel

UE-230172 / PacifiCorp  
October 5, 2023  
WUTC Data Request 155 1<sup>st</sup> Supplemental

### **WUTC Data Request 155**

**Power Costs** - If PacifiCorp agrees that the Jim Bridger plant is not subject to the final Ozone Transport Rule and/or admits that it would be more reasonable to forecast Rate Year 1 NPC based on Aurora model data for April 2024-March 2025 (or some other period), please provide revised versions of all affected exhibits and work papers, also including changes and updates considered in PacifiCorp Response to UTC Staff Data Request No. 135, 1st Revised, Attachment 135-2 (e.g., 230172-PAC-RJM-Aurora2024NPCMasterBaseWA1\_WUTC 135b1).

In PacifiCorp's responses to the following questions, please utilize these revised exhibits and work papers as a baseline for any quantitative responses.

### **1<sup>st</sup> Supplemental Response to WUTC Data Request 155**

Further to the Company's response to WUTC Data Request 155 dated October 2, 2023, and without waiving the objections identified in that previous response, the Company provides the following additional response:

PacifiCorp is currently actively reviewing and analyzing intervenor testimony and developing a position that will be provided in the Company's Rebuttal Testimony on October 27, 2023. PacifiCorp will supplement these responses after providing rebuttal testimony.

Additionally, PacifiCorp does not admit that it would be more reasonable to forecast Rate Year 1 NPC based on Aurora model data for April 2024 to March 2025. However, PacifiCorp will be providing an updated NPC forecast and associated workpapers that removes the impact of the Ozone Transport Rule for 2024 in the Company's Rebuttal Testimony.

PREPARER: Counsel

SPONSOR: Counsel

UE-230172 / PacifiCorp  
October 5, 2023  
WUTC Data Request 156 1<sup>st</sup> Supplemental

### **WUTC Data Request 156**

**Power Costs** - Please state whether Exh. BGM-7C represents the monthly price of coal for Jim Bridger Units 3 and 4 (expressed in \$/ton).

- (a) If not, please explain the difference and provide any supporting documentation or calculations necessary to fully understand PacifiCorp's position.
- (b) If it does, please reconcile that monthly price of coal with the annual price of coal (expressed in \$/mmBtu) found in workpapers 230172-PAC-RJM-AGMFuelPrices (C), tab "yr\_x". (Note that the same data are also presented in workpaper 230172-PAC-RJM-Aurora2024NPCMasterBaseWA1 (C), tab "Coal Expense Calculation").
- (c) Please explain whether PacifiCorp's coal expenses included in Exh. RJM-2 include the depreciation and reclamation costs discussed in Exh. BGM-1CT at 32 33.
- (d) In either case, noting that Exh. BGM-7C provides coal prices on a monthly basis and the "Coal Expense Calculation" provides coal consumption on a monthly basis, please provide witness Mitchell's opinion as to whether coal expense should be calculated using monthly consumption and prices or using annual figures. Please provide any supporting calculations for this response.

### **1<sup>st</sup> Supplemental Response to WUTC Data Request 156**

Further to the Company's response to WUTC Data Request 156 dated October 2, 2023, and without waiving the objections identified in that previous response, the Company provides the following additional response:

PacifiCorp is currently actively reviewing and analyzing intervenor testimony and developing a position that will be provided in the Company's Rebuttal Testimony on October 27, 2023. PacifiCorp will supplement these responses after providing rebuttal testimony.

PREPARER: Counsel

SPONSOR: Counsel

UE-230172 / PacifiCorp  
October 5, 2023  
WUTC Data Request 157 1<sup>st</sup> Supplemental

### **WUTC Data Request 157**

**Power Costs** - In Exh. BGM-1CT at 38-41, witness Mullins argues that the total-company Aurora modeling frequently results in Washington's gas units being ramped down in favor of lower-cost non-Washington plants, rather than in favor of market purchases.

- (a) Does witness Mitchell agree with this observation?
- (b) During hours in which Washington's gas units are not fully dispatched, but Washington jurisdictional generation is insufficient to meet Washington load, is it reasonable to assign costs to serve that Washington load on the basis of available Washington gas unit dispatch cost if that cost is lower than market power prices during the same hour?

### **1<sup>st</sup> Supplemental Response to WUTC Data Request 157**

Further to the Company's response to WUTC Data Request 157 dated October 2, 2023, and without waiving the objections identified in that previous response, the Company provides the following additional response:

PacifiCorp is currently actively reviewing and analyzing intervenor testimony and developing a position that will be provided in the Company's Rebuttal Testimony on October 27, 2023. PacifiCorp will supplement these responses after providing rebuttal testimony.

PREPARER: Counsel

SPONSOR: Counsel