

**ATTACHMENT 1**

**to**

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

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

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

Respondent.

Docket No. UE-230172

DECLARATION OF RAMON J.  
MITCHELL

I, Ramon J. Mitchell, declare under penalty of perjury under the laws of the state of Washington:

1. My name is Ramon J. Mitchell, my business address is 825 NE Multnomah Street, Suite 600, Portland, Oregon 97232. I am employed by PacifiCorp dba Pacific Power & Light Company (PacifiCorp or Company) and my present position is Manager, Net Power Costs. I make this declaration in support of PacifiCorp's Response to Staff's Motion to Compel, which it filed on October 11, 2023.
2. In my direct testimony in this proceeding, I described the results of the Company's forecast of Net Power Costs (NPC) using the Aurora software (Aurora model), developed by Energy Exemplar. The Aurora model based NPC analysis the Company developed for this case includes complete model inputs assembled for calendar year 2024 only, and does not include complete model inputs for 2025.
3. I reviewed Staff of the Washington Utilities and Transportation Commission's (Staff) Data Request (DR) 155. It is my understanding that DR 155 requests an update to the NPC forecast based on Aurora model data, and associated inputs, for April 2024 through March 2025.

4. Providing a response to DR 155 would not just require rerunning the Aurora model or recalculating the model inputs—instead, the Company would need to build an entirely new model using new model inputs for the twelve-month period January 2025 to December 2025, as the model is configured to process annual inputs and produces annual NPC. This process would at minimum involve: (1) creating new resources and associated resource characteristics for new wind, solar and battery resources; (2) developing templates and associated modeling processes to accommodate power market hedges for 2025; (3) requesting the creation of Washington-specific 2025 coal fuel supply budgets for the NPC forecast; (4) requesting the creation of 2025 hydrologic (hydroelectric generation availability) forecasts; and (5) developing new methods to accurately model the nuances of battery energy storage systems, which have yet to be modeled in any Washington NPC forecast. I estimate that this process would take dedicated Company NPC staff four to six weeks, including the time for quality assurance and verification, and would require their exclusive focus on this task. The NPC staff also have obligations in other jurisdictions, which they would not be able to meet if resources were diverted to focus on preparing a new model.
5. PacifiCorp performs the NPC model creation process at the end of each year for the following year to create the NPC forecast that is used in regulatory filings throughout that calendar year. For example, the process of building this model for calendar year 2025 will begin in December of 2023 and be completed in early 2024.
6. I am currently in the process of performing an NPC forecast update and will be providing the results in my rebuttal testimony. This NPC forecast update also includes removing the impact of the Ozone Transport Rule for calendar year 2024, which in part

addresses Staff's request in DR 155. However, given the specific request made in DR 155, which is a cumulative request that builds on top of multiple prior DRs, the associated amount of time required to perform that specific, cumulative modeling request, and the single NPC team member who has been managing these multiple, cumulative, duplicative, and ongoing requests from Staff, it is impossible to provide the results prior to the deadline for filing rebuttal testimony.

7. The Company's NPC forecast-modeling team has limited resources to expedite any requested Aurora modeling. The forecast-modeling team consists of 3 members, all of whom are balancing the demands of preparing rebuttal testimony in this case, supporting ongoing rate proceedings in California, Oregon, and Wyoming, and performing the day-to-day duties of their jobs. There is not sufficient time to provide a response to DR 155 within the time period requested by Staff's DR or any time prior to the rebuttal testimony deadline in this proceeding. The earliest possible timing for providing a response to DR 155 would be mid-December 2023 to early January 2024.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in this proceeding.

Dated October 11, 2023,



\_\_\_\_\_  
Ramon J. Mitchell  
Manager, Net Power Costs  
PacifiCorp