

UE-210447 / PacifiCorp
September 15, 2021
WUTC Informal Data Request 17

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Re: Power Costs

Please explain and provide an analysis addressing the variance in net power costs from the base year (set in UE-152253) to the year ended December 31, 2020.

Response to WUTC Informal Data Request 17

PacifiCorp objects to this request as overly broad, unduly burdensome, unreasonably cumulative, duplicative, and not reasonably calculated to lead to admissible evidence. Without waiving the foregoing objection, PacifiCorp responds as follows:

PacifiCorp notes that the baseline net power costs (NPC) were set in Docket UE-140762 and not Docket UE-152253 as previously noted.

As identified on pages 12-14 of Exhibit JP-1T, actual NPC was \$68 million less than base NPC for the Deferral Period. These differences were identified by each individual category in Table 3 of Exhibit JP-1T, which is reproduced below for ease of reference.

Table 3

Net Power Cost Reconciliation (Smillions)

Base NPC	\$ 551
Increase/(Decrease) to NPC:	
Wholesale Sales Revenue	56
Purchased Power Expense	(61)
Coal Fuel Expense	(60)
Natural Gas Expense	(10)
Wheeling and Other Expense	7
Total Increase/(Decrease)	(68)
Adjusted Actual NPC	\$ 482

As noted on page 13 of Exhibit JP-1T, the baseline was set using a test period of April 2015 through March 2016. Since that test period was established, there have been significant changes in PacifiCorp's operations, market conditions, and load deviations. With a test period over five years old, it is nearly impossible to provide a detailed explanation of individual changes that would drive the deviation from base NPC.

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

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Additionally, please reference exhibit NEW-PPL-PCAM-WP2, tab “NPC Comparison” for analysis on the variance in 2020 actual NPC and base NPC set in Docket UE-140762. A narrative explanation is also available in the “Differences in NPC” section of Exhibit JP-1T. WUTC staff may request specific information about the items identified in that work paper or testimony to seek additional information.

PREPARER: Jack Painter

SPONSOR: Jack Painter

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