Exh. CRM-7 Dockets UE-230172 and UE-210852 Witness: Chris R. McGuire

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

DOCKETS UE-230172 and UE-210852 (Consolidated)

Complainant,

v.

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

Respondent.

In the Matter of

ALLIANCE OF WESTERN ENERGY CONSUMERS'

Petition for Order Approving Deferral of Increased Fly Ash Revenues

EXHIBIT TO

CROSS-ANSWERING TESTIMONY OF

CHRIS R. MCGUIRE

STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PacifiCorp Response to Staff Data Request No. 149

October 27, 2023

UE-230172 / PacifiCorp October 2, 2023 WUTC Data Request 149

WUTC Data Request 149

Colstrip Unit 4/Jim Bridger Units 3-4 - In its responsive testimony, Staff recommended that the Commission order PacifiCorp to establish a tracker for the recovery of going-forward costs associated with the Company's Washington-allocated coal-fired resources (i.e., Colstrip Unit 4 and Jim Bridger Units 3-4). Staff proposed that, consistent with the Colstrip trackers the Commission authorized for PSE and Avista, a tracker authorized for PacifiCorp should include all costs (and applicable cost offsets) associated with those units, except for costs included in power costs. See McGuire, Exh. CRM-1T at 62:5-20.

Please identify the annual revenue requirements for rate years one and two that PacifiCorp included in its direct case related to the non-NPC costs for Colstrip Unit 4 and Jim Bridger Units 3-4. In your response, please show how the Colstrip 4/Bridger 3-4 annual revenue requirements were calculated, and separately identify costs for distinct revenue requirement components (e.g., decommissioning and remediation, depreciation, O&M, tax-related items, return on rate base, etc.). Please provide separate calculations for rate years one and two.

Response to WUTC Data Request 149

PacifiCorp objects to this data request as it seeks rebuttal testimony prior to the schedule established by the Washington Utilities and Transportation Commission in Order 03, issued in this docket on May 24, 2023. PacifiCorp also objects as this data request is seeking analysis not performed by the Company. Without waiving the foregoing objection, PacifiCorp responds as follows:

The requested analysis has not been performed by the Company. However, in the work papers supporting the errata direct testimony of Company witness, Sherona L. Cheung (Exhibit No. SLC-1Tr) filed July 7, 2023, the Company provided calculations in work paper "230172-PAC-SLC-WP-RevReqImpactofCoalFiredResourceRemovalERRATA-7-7-23.xlsx" supporting the estimated impact for non-net power costs (NPC) effects of removing coal-fired resources from Washington rates at the end of 2025

As discussed in Exhibit No. SLC-1Tr, on pages 18-19, however, it is important to note that this estimated impact is subject to change based on the final approved capital rate base associated with coal-fired resources in the outcome of this general rate case (GRC) proceeding. Ultimately, the Company can only calculate the coal-fired resource removal impact once asset balances in rates as of December 31, 2025, is known from the order that is issued in this GRC proceeding.

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PREPARER: Sherona L. Cheung

SPONSOR: Sherona L. Cheung