

**Exh. JDW-31
Dockets UE-230172 and UE-210852
Witness: John D. Wilson**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

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

Respondent.

**DOCKETS UE-230172 and
UE-210852 (Consolidated)**

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**

JOHN D. WILSON

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PacifiCorp Response to UTC Staff Data Request 159

December 27, 2023

UE-230172 / PacifiCorp
October 16, 2023
WUTC Data Request 159

WUTC Data Request 159

Power Costs - Please clarify your response to DR 150. Please supply “PacifiCorp’s forecast costs” (as opposed to opinion on costs) as filed in this multi-year rate case application. Staff requests a statement as to the trend in costs as opposed to the actual costs. If PacifiCorp prefers, supplying actual costs for planning activities, trading personnel, and other current expenses related to market purchases and sales as filed in its application for 2025 (after participation in EDAM begins) as compared to 2024 (before participation in EDAM begins) is a suitable alternative.

Response to WUTC Data Request 159

The Company assumes that the reference to “DR 150” is intended to be a reference to WUTC Data Request 150. Based on the foregoing assumption, the Company responds and clarifies as follows:

PacifiCorp objected to WUTC Data Request 150 and therefore also objects to WUTC Data Request 159 because 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. Notwithstanding the foregoing objection, the Company responds as follows:

While the California Independent System Operator (CAISO) published the final market design in December 2022, the CAISO just recently filed its extended day-ahead market (EDAM) tariff with the Federal Energy Regulatory Commission (FERC); in August 2023. The CAISO has not yet published detailed technical specifications able to guide a detailed assessment of the needed software changes and related process changes. As such, the Company does not yet have a forecast regarding more or fewer expenses for planning activities, trading personnel, or other current activities resulting from EDAM participation. Additionally, EDAM participation is now scheduled to begin in 2026 and not 2025.

PREPARER: Paul Wood / Kerstin Rock

SPONSOR: To Be Determined