

**Exh. JDW-28
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 158

December 27, 2023

UE-230172 / PacifiCorp
October 16, 2023
WUTC Data Request 158

WUTC Data Request 158

Power Costs - WUTC Data Request 135 requested certain model runs that included “Corrections to model inputs that the Company has acknowledged.” It appears from PacifiCorp’s response to WUTC Data Request 153 that on or soon after July 27, 2023, the Company became aware that Washington net power costs (NPC) would be impacted by the removal of the Ozone Transport Rule from all Company plants.

- (a) Please identify any other material issues that the Company has become aware of that it acknowledges would have an effect on Washington NPC but are not addressed in its filed NPC.
- (b) Please provide revised responses to WUTC Data Request 135 also considering the removal of the Ozone Transport Rule from all Company plants as well as any other material issues identified in response to subpart (a) in each portion of the Company’s responses to WUTC Data Request 135 that considers Company-acknowledged corrections to Aurora model inputs.

Response to WUTC Data Request 158

The Company objects to this request to the extent it is unduly burdensome and requesting analysis not preformed by the Company. Notwithstanding the foregoing objection, the Company responds as follows:

- (a) Material issues that the Company has become aware of that affect Washington net power costs (NPC):
 - 1. Contingency reserve requirement calculation.
 - 2. Energy imbalance market (EIM) greenhouse gas (GHG) benefit calculation.
 - 3. In-model shadow price calculation.
 - 4. Short-term physical power transaction calculation.
 - 5. Thermal generation fuel startup cost calculation.
 - 6. Wind capacity factor calculation.
- (b) Consistent with Judge Howard’s ruling on October 12, 2023, and as communicated to the Washington Utilities and Transportation Commission (WUTC) staff on October 13, 2023, the Company will provide its response to subpart (b) on or before October 27, 2023.

PREPARER: Ramon J. Mitchell / Counsel

SPONSOR: Ramon J. Mitchell / Counsel