

**Exh. JH-6T  
Dockets UE-230172 and UE-210852  
Witness: Joanna Huang**

**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**

**CROSS-ANSWERING TESTIMONY OF**

**JOANNA HUANG**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

***Results of Operations and Revenue Requirement Analysis,  
Production Factor - Year 1***

**October 27, 2023**

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## LIST OF EXHIBITS

- Exh. JH-7 Results of Operations and Revenue Requirement Analysis for Rate Year 1
- Exh. JH-8 Results of Operations and Revenue Requirement Analysis for Rate Year 2
- Exh. JH-9 Production Factor, Adjustments 9.1

1 I. INTRODUCTION

2

3 Q. Please state your name and business address.

4 A. My name is Joanna Huang, and my business address is 621 Woodland Square Loop  
5 SE, Lacey, Washington, 98503. My business mailing address is P.O. Box 47250,  
6 Olympia, Washington, 98504-7250. My business email address is  
7 joanna.huang@utc.wa.gov.

8

9 Q. Are you the same Joanna Huang who submitted response testimony on behalf of  
10 Staff on September 14, 2023, in these dockets?

11 A. Yes.

12

13 Q. Have you prepared exhibits?

14 A. Not at this time. As noted below, Staff is waiting for data request responses to  
15 provide an updated position on net power costs. Because these figures are not yet  
16 available, I cannot yet provide updated exhibits that demonstrate to how this impacts  
17 Staff's overall revenue requirement recommendation. However, once those are  
18 provided, and if Staff's motion to revise testimony is granted, I intend to provide  
19 Exhibits JH-7, JH-8 and JH-9. Exhibit JH-7 would be an updated version of Exhibit  
20 JH-2 that incorporates Staff's updated positions that impact the overall revenue  
21 requirement in Rate Year 1. Exhibit JH-8 would be an updated version of Exhibit  
22 JH-3, which incorporates Staff's updated positions that impact the overall revenue

1 requirement in Rate Year 2. Exhibit JH-9 would be an updated version of Exhibit  
2 JH-5, which is Production Factor, Adjustment 9.1.

3  
4 **II. SCOPE AND SUMMARY OF TESTIMONY**

5  
6 **Q. Please summarize what you will be addressing in your testimony.**

7 A. My cross-answering testimony provides an updated revenue requirement calculation  
8 based on Staff's adoption of some of the other noncompany party's positions in  
9 response testimony. These adjustments will be reflected in Exhibit JH-7 and JH-8.  
10 Explanations of the adjustments can be found in the cross-answering testimony of  
11 Staff witness Wilson, Exhibit JDW-24T. In addition, Production Factor, Adjustment  
12 9.1 as shown in Exhibit JH-9, incorporates Staff witness Wilson's updated positions  
13 on Adjustment 5.1 and Adjustment 5.2.

14  
15 **Q. Are you able to provide the updates to Staff's overall revenue requirement  
16 recommendation now?**

17  
18 A. No. As noted in the cross-answering testimony of Staff witness Wilson, our net  
19 power cost witness cannot provide his updated NPC position prior to receiving the  
20 data request responses from Pacificorp, which are due November 30, 2023. As a  
21 result, I cannot incorporate those new net power cost figures into Staff's overall  
22 revenue requirement recommendation at this time. Staff has filed a motion to revise  
23 cross answering testimony once that discovery is provided. If granted, Staff will

1 work as quickly as possible to file revised testimony filling in the blanks left below  
2 in my testimony and including cross-answering exhibits.

3  
4 **III. DISCUSSION**

5  
6 **Q. Do you have any updates to Staff's overall revenue requirement**  
7 **recommendation you discussed in your response testimony, Exhibit JH-1T?**

8 A. Yes. As explained further in the testimony of Staff witness Wilson, Staff has updated  
9 its net power cost recommendation in light of the response testimony filed by the  
10 other noncompany parties in this case. As a result of these updated positions, Staff's  
11 overall recommended revenue requirement position has changed for Rate Year 1 and  
12 Rate Year 2.

13  
14 **Q. What is the overall impact of Staff's updated positions on Rate Year 1 revenue**  
15 **requirement?**

16 A. The positions reduce Staff's the overall revenue requirement for Rate Year 1 to  
17 [TBD]. See Exhibit JH-7.

18  
19 **Q. What is the overall impact of Staff's updated positions on Rate Year 2 revenue**  
20 **requirement?**

21 A. The positions reduce Staff's the overall revenue requirement for Rate Year 2 to  
22 [TBD]. See Exhibit JH-8.

1 **Q. Is there anything adjustments you have made will affect Staff's overall revenue**  
2 **requirement?**

3 A. **Production Factor (Adjustment 9.1)**—The production factor is a means of  
4 adjusting pro forma generation-related components of the revenue requirement to  
5 Test Period expense and balance levels. Once Staff witness Wilson has adjusted his  
6 net power cost recommendation, Staff will update his net power cost  
7 recommendation on Adjustment 5.1/5.2. Production Factor, Adjustment 9.1, will be  
8 adjusted accordingly.

9

10 **Q. Does this conclude your testimony?**

11 A. Yes.