

Exh. JP-4
Docket UE-230172
Witness: Jack Painter

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba
PACIFIC POWER & LIGHT COMPANY

Respondent.

In the Matter of

ALLIANCE OF WESTERN ENERGY
CONSUMERS'

Petition for Order Approving Deferral of
Increased Fly Ash Revenues

Docket UE-230172
(Consolidated)

Docket UE-210852
(Consolidated)

PACIFICORP

EXHIBIT OF JACK PAINTER

Public Counsel's Response to PacifiCorp Data Requests 013-023

October 2023

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
Power & Light Co.**

**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 013
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 13:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 36, line 7-11, Witness Wilson asserts that the inclusion of a deadband in the PCAM “results in the Company having the opportunity to retain 100 percent of a windfall that is unrelated to its operations, which is not an equitable sharing of risk between customers and the Company.” Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson’s statement. If Public Counsel disagrees, please provide an explanation as to why the inclusion of a deadband in the PCAM would *not* result in the Company having the opportunity to retain 100 percent of a windfall that is unrelated to its operations.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position on Wilson, Exh. JDW-1T at 36:7–11, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
Power & Light Co.**

**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 014
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 14:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 36, lines 19-21, Witness Wilson states that “a 90/10 risk sharing mechanism is an equitable sharing of risk between customers and the Company, while continuing to provide the Company with a reasonable incentive to manage or control power costs.” Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson’s statement. If Public Counsel disagrees, please explain why a 90/10 risk sharing mechanism is *not* considered an equitable sharing of risk between customers and the Company.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position on Wilson, Exh. JDW-1T at 36:19–21, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
Power & Light Co.**

**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 015
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 15:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 31, line 9 through page 33, line 7, Witness Wilson provides analysis and concludes that the current structure of the PCAM does not equitably share risk between customers and PacifiCorp for power cost variability. Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson's statement. If Public Counsel disagrees, please provide an explanation as to which specific portions of Witness Wilson's referenced testimony it disagrees with, and provide an explanation as to why Public Counsel believes that the PCAM *does* currently equitably share risk between customers and PacifiCorp for power cost variability.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position on Wilson, Exh. JDW-1T at 31:9–33:7, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
Power & Light Co.**

**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 016
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 16:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 31, lines 17-20, Witness Wilson states that the structure of the PCAM was designed to be asymmetric in favor of the customer. Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson's statement. If Public Counsel disagrees, please provide an explanation as to why Public Counsel believes that the current structure of the PCAM was *not* designed to be asymmetric in favor of the customer.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position on Wilson, Exh. JDW-1T at 31:17–20, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
Power & Light Co.**

**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 017
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 17:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 31, lines 14-16, Witness Wilson states that “the finding that the PCAM mechanism has resulted in substantially more customer ‘losses’ than Company ‘losses’ is correct.” Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson’s statement. If Public Counsel disagrees, please provide an explanation as to why Public Counsel believes that the PCAM mechanism has *not* resulted in substantially more customer losses than company losses.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position on Wilson, Exh. JDW-1T at 31:14–16, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
Power & Light Co.**

**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 018
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 18:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 35, lines 13-17, Witness Wilson asserts that the five-level PCAM structure is unnecessarily complicated and could potentially result in a windfall for either PacifiCorp or its customers. Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson's statement. If Public Counsel disagrees, please provide an explanation as to why Public Counsel believes that the five-level PCAM structure is not unnecessarily complicated and could not potentially provide a windfall for either PacifiCorp or its customers.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position on Wilson, Exh. JDW-1T at 35:13–17, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
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**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 019
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 19:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 23, lines 5-13, Witness Wilson states that they agree that PacifiCorp will have less direct control over Net Power Cost (NPC) when it joins the Extended Day-Ahead Market (EDAM). Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson's statement. If Public Counsel disagrees, please provide an explanation as to why Public Counsel believes PacifiCorp will not have less direct control over NPC when it joins the EDAM.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson, Exh JDW-1CT. Please see Robert L. Earle, Exh. RLE-1CT at 4:1–6:14.

**BEFORE THE WASHINGTON
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Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
Power & Light Co.**

**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 020
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 20:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 24, lines 6-9, Witness Wilson states they agree with Company Witness Painter's statement that "The key drivers of NPC variances, like deviations in load, renewable resource generation, and market spot power prices are outside PacifiCorp's control" when the Company joins the Extended Day-Ahead Market, and provides a table of other NPC drivers that Witness Wilson believes are outside of PacifiCorp's control. Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson's statement. If Public Counsel disagrees, please provide an explanation as to why Public Counsel believes that key drivers of NPC variances, like deviations in load, renewable resource generation, and market spot power prices, are not outside PacifiCorp's control once the Company joins the EDAM.

RESPONSE:

Please see Public Counsel Response to PacifiCorp Data Request No. 10.

**BEFORE THE WASHINGTON
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Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
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**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 021
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 21:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 27, lines 1-7, Witness Wilson states that they agree that Net Power Cost (NPC) variability will increase as the portion of power supplied by renewable generation grows. Please provide a narrative explanation stating whether Public Counsel agrees with Witness Wilson's statement. If Public Counsel disagrees, please provide an explanation as to why Public Counsel believes that Net Power Cost variability will not increase as the portion of power supplied by renewable generation grows.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position regarding Wilson, Exh. JDW-1CT at 27:1-7, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
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**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 022
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 22:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 39, lines 3-4, Witness Wilson recommends that the Washington Utilities and Transportation Commission implement their PCAM recommendations starting in 2025. Please provide a narrative explanation of Public Counsel's position on the referenced portion of Witness Wilson's testimony.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position regarding Wilson, Exh. JDW-1CT at 39:3-4, Public Counsel will supplement this response.

**BEFORE THE WASHINGTON
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Docket UE-230172

**Washington Utilities & Transportation Commission v. PacifiCorp d/b/a/ Pacific
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**RESPONSE OF PUBLIC COUNSEL TO PACIFICORP
DATA REQUEST NO(S). 13 – 23**

Request No: 023
Directed to: Lisa Gafken, Public Counsel
Date Received: October 13, 2023
Date Produced: October 24, 2023
Prepared by: Robert Earle
Witnesses: Robert Earle

**PACIFICORP DATA REQUEST NO. 23:
Re: PCAM**

In reference to Wilson, Exh. JDW-1CT, page 37, line 1 through page 38, line 14, Witness Wilson provides a proposal on how the PCAM adjustment threshold should be revised. Please provide a narrative explanation of Public Counsel's position on the referenced portion of Witness Wilson's testimony.

RESPONSE:

Public Counsel has not as of this date provided testimony in response to the Direct Testimony of John D. Wilson. If Public Counsel develops a position regarding the PCAM adjustment threshold, Public Counsel will supplement this response.