

UE-210447 / PacifiCorp  
September 9, 2021  
PC Informal Data Request 3

### PC Informal Data Request 3

#### **Re: Actual Net Power Costs**

Please provide any studies, memos, benchmarks or other analyses that indicate PacifiCorp's dispatch of its resources, purchases and sales of energy or capacity, and balancing of its system were prudent, efficient, or in the public interest for the year 2020. If such evidence focuses on or uses data from periods prior to the year 2020, please explain why it is relevant to the year 2020. Please provide any data or spreadsheets used as support in MS Excel format.

**Revised request** – on August 31, 2021, Public Counsel revised and re-clarified Public Counsel Informal Data Request as follows:

#### **Re: Actual Net Power Costs. Direct Testimony of Jack Painter, Exh. JP-1T at 7:4–6.**

“As previously noted, the PCAM deferral is calculated on a monthly basis as the difference between Base NPC collected through general rates and Actual NPC, including actual non-NPC EIM costs”,

- (a) Please provide any studies, memos, benchmarks or other analyses that indicate, for the year 2020, PacifiCorp's Actual NPC was prudent, efficient, or in the public interest. This response should include, but not be limited to, the dispatch of its resources, purchases and sales of energy or capacity, and balancing of its system. Please provide any data or spreadsheets used as support in MS Excel format.
- (b) If such evidence provided in response to subpart (a) above focuses on or uses data from periods prior to the year 2020, please explain why it is relevant to the year 2020.

### Response to PC Informal Data Request 3

PacifiCorp objects to this request as overly broad, unduly burdensome, unreasonably cumulative, duplicative, and not reasonably calculated to lead to admissible evidence. PacifiCorp's actual net power costs (NPC) for calendar year 2020 includes over 58 million megawatt-hours (MWh) across six states in 2020, and Public Counsel would need to be more specific in its request in order for PacifiCorp to appropriately respond. Without waiving the foregoing objection, PacifiCorp responds as follows:

- (a) Please refer to the confidential work paper supporting the direct testimony of Company witness, Jack Painter, specifically file “NEW-PPL-PCAM-WP1 CONFIDENTIAL” which includes a breakdown of PacifiCorp's West Control Area Inter-Jurisdictional Allocation Methodology (WCA) NPC for calendar year 2020, by

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month and by resource. Public Counsel may request specific information about an element of that report in order to seek additional information.

(b) N/A.

PREPARER: Jack Painter

SPONSOR: Jack Painter

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.