Exhibit BGM-12 Docket UE-230482 Witness: Bradley G. Mullins

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

DOCKET UE-230482

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

Petitioner,

2022 Power Cost Adjustment Mechanism Annual Report.

EXHIBIT BGM-12

RESPONSES TO DATA REQUESTS

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSES TO DATA REQUESTS

DATE PREPARED:	April 17, 2024	WITNESS:	Wesley Yeomans
DOCKET:	UE-230482	RESPONDER:	Wesley Yeomans
REQUESTER:	AWEC	TELEPHONE:	

DATA REQUEST NO. 1:

Referring to Exhibit WY-2, please describe any and all knowledge and experience Mr. Yeomans has with PacifiCorp prior to the present case.

RESPONSE:

Mr. Yeomans does not have any previous experience with PacifiCorp. He has extensive experience with electric power and gas markets in New York, New England, and the PJM RTO. He was the Vice President of NYISO Operations from 2011–2022 with executive responsibilities for New York transmission operations and execution of NYISO energy and installed capacity markets. In this role, he was heavily involved with coordination between the interstate gas pipeline systems, the NY Gas LDC pipeline systems, and electric generator operations. From 1998 to 2005 he was responsible for Niagara Mohawk's electric wholesale portfolio management including hedging responsibilities.

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DATA REQUEST NO. 2:

Please describe any knowledge Mr. Yeomans has of: (a) the methodology PacifiCorp uses to allocate the costs and revenues of its system to the states that it serves; and (b) the Washington Interjurisdictional Allocation Methodology ("WIJAM") specifically.

RESPONSE:

- a. Mr. Yeoman's do not have knowledge of the methodologies PacifiCorp uses to allocate the costs and revenues of its system to the states it serves.
- b. Mr. Yeoman's has a broad, high level overview understanding of the WIJAM. Details of the allocation of system wide hedge and specific accounting associated with the WIJAM are outside the scope of his testimony.