

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

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

Respondent.

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DOCKET UE-210402

**TESTIMONY OF COREY J. DAHL  
ADDRESSING THE FULL MULTI-PARTY SETTLEMENT AGREEMENT  
ON BEHALF OF  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**Exhibit CJD-1T<sub>r</sub>**

November 5, 2021

Revised November 8, 2021

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1 **Q. Please state your employer and business address.**

2 A. I serve as a Regulatory Analyst for the Public Counsel Unit of the Washington  
3 State Office of the Attorney General (“Public Counsel”). My business address is  
4 800 5th Ave, Suite 2000, Seattle, Washington, 98104.

5 **Q. On whose behalf are you testifying?**

6 A. I am testifying on behalf of Public Counsel in this proceeding.

7 **Q. Have you previously testified in this proceeding?**

8 A. No, I have not yet testified in this proceeding.

9 **Q. Please state your qualifications.**

10 I earned a B.A. in Economics and a B.A. in English from the University of St.  
11 Thomas in St. Paul, Minnesota in 2011. In 2016, I earned a Master of Public  
12 Administration degree from the Daniel J. Evans School of Public Policy and  
13 Governance at the University of Washington in Seattle. While completing my  
14 graduate studies, I worked on low-income and housing policy for a non-profit  
15 advocacy organization and worked as a legislative assistant for the Seattle City  
16 Council. Additionally, I completed Michigan State University and the National  
17 Association of Regulatory Utility Commissioners’ Utility Rate School in May  
18 2017.

19 My current employment with Public Counsel began in October 2016.  
20 Since joining the Attorney General’s Office, I have worked on a variety of  
21 energy, transportation, and telecommunications matters, including Avista’s 2019  
22 General Rate Case (Dockets UE-190334, UG-190335 and UE-190222), Lugg’s  
23 2020 Complaint (Docket TV-200029), WasteXpress’s 2020 Complaint (Docket

1 TG-200131), Dolly's Petitions for Household Goods Mover Permits (Dockets  
2 TV-190593 and TV-190594), CenturyLink's 2017 911 Outage Complaint  
3 (Docket UT-190209), Cascade's 2017 General Rate Case (Docket UG-170929),  
4 Puget Sound Energy's 2017 General Rate Case (Dockets UE-170033 and  
5 UG-170034), Avista's 2017 General Rate Case (Dockets UE-170485 and  
6 UG-170486), the Puget Sound Energy Greenwood Explosion Complaint (Docket  
7 PG-160924), Pacific Power's Schedule 300 Tariff Revision case (Docket  
8 UE-161204), the CenturyLink-Level3 Merger (Docket UT-170042), Cascade  
9 Natural Gas Company's 2017 General Rate Case (Docket UG-170929), the  
10 Avista-Hydro One Merger (Docket U-170970), Avista's 2018 Depreciation  
11 Petition (Dockets UE-180167 and UG-180168), CenturyLink's 2017 911 Outage  
12 Complaint (Docket UT-190209), the 2019 Avista Remand (Dockets UE-150204,  
13 UG-150205).

14 I testified on behalf of Public Counsel in the 2020 Northwest Natural Gas  
15 Company General Rate Case (Docket UG-200994), 2020 Avista General Rate  
16 Case Settlement (Dockets UE-200900 and UG-200901), 2019 PacifiCorp General  
17 Rate Case Settlement (Docket UE-191024), 2019 Avista General Rate Case  
18 Partial Settlement (Dockets UE-190334 and UG-190335), in support of the  
19 settlement regarding the merger of CenturyLink and Level3 Communications  
20 (Docket UT-170042) in May 2017, on low-income issues in Cascade's General  
21 Rate Case (Docket UG-170929), and in the Avista-Hydro One Merger Settlement  
22 (Docket U-170970).

1           Beyond adjudications, I have worked on rulemakings, low-income rate  
2 assistance, energy conservation, and integrated resource plan (IRP) issues for  
3 multiple Washington utilities. In particular, I have been involved in several  
4 rulemakings, including the Intervenor Funding Policy (Docket U-210595), Clean  
5 Energy Transformation Act (CETA) Integrated Resource Planning (IRP)  
6 Rulemaking (Docket UE-190698), CETA Energy Independence Act Rulemaking  
7 (Docket UE-190652), CETA Clean Energy Implementation Plan Rulemaking  
8 (Docket UE-191023), CETA Purchases of Electricity Rulemaking (Docket UE-  
9 190837), generic Cost of Service Collaborative (Dockets UE-170002 and  
10 UG-170003), and IRP Rulemaking (Docket U-161024). Additionally, I participate  
11 in conservation advisory groups for Puget Sound Energy and Cascade Natural  
12 Gas, as well as the Northwest Natural Gas IRP Technical Working Group,  
13 Cascade IRP Technical Advisory Committee, and the Avista IRP Technical  
14 Advisory Committee. I also participate in low-income advisory groups for  
15 Cascade Natural Gas, Puget Sound Energy, and Avista. More recently, I have  
16 observed the Puget Sound Energy Equity Advisory Group and participated in  
17 Avista’s and Puget Sound Energy’s CEIP Advisory Groups.

18 **Q. What is the purpose of your testimony?**

19 A. I am testifying to address the terms of the Full Multi-Party Settlement on  
20 PacifiCorp’s Power Cost Only Rate Case (PCORC). PacifiCorp (or “Company”),  
21 Commission Staff, [Walmart](#), and The Energy Project have all joined the  
22 Settlement and will be referred to collectively as the “Settling Parties.” The

1 Alliance for Western Energy Consumers (AWEC) opposes the Settlement  
2 Agreement as filed.

3 **Q. Please briefly describe the Settlement Agreement.**

4 A. The PCORC proceeding was filed pursuant to the settlement of PacifiCorp's  
5 general rate case in Docket UE-191024.<sup>1</sup> The Full Multi-Party Settlement in this  
6 PCORC resolves all issues in this proceeding including a reset of PacifiCorp's  
7 Net Power Cost (NPC) baseline, provides an adjustment for load production  
8 factor and disposition of production tax credits, defers major maintenance  
9 expenses at Colstrip Unit 4, and provides for an update to the NPC baseline in a  
10 compliance filing after the Washington Utilities and Transportation Commission  
11 ("Commission") issues an order on this settlement.

12 **Q. What is Public Counsel's position on the Settlement?**

13 A. Public Counsel is not a party to the Settlement. Public Counsel neither supports  
14 nor opposes the agreement reached by the Settling Parties.

15 **Q. Are there specific issues Public Counsel would like to address as reasonable  
16 in the Settlement Agreement?**

17 A. Yes, there are two components of the Settlement that I believe are reasonable:

- 18 • The load production factor adjustment; and
- 19 • The disposition of the Production Tax Credits.

20 **Q. Please describe the Settlement's load production factor adjustment.**

21 A. The Settlement revises the load production factor, as compared to the Company's  
22 initial filing. Under the Settlement, the load production factor is reduced by a total

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<sup>1</sup> *Wash. Utils. & Transp. Comm'n v. PacifiCorp*, Docket UE-191024 et al., Final Order 09 / 07 / 12, ¶¶ 63, 64 (Dec. 14, 2020).

1 of \$646,403, compared to the requested \$13.1 million increase. While this still  
2 results in an increase to customer rates, the normalization factors as a result of this  
3 adjustment (including weather and other extreme events) have substantively  
4 reduced the Company's overall request.

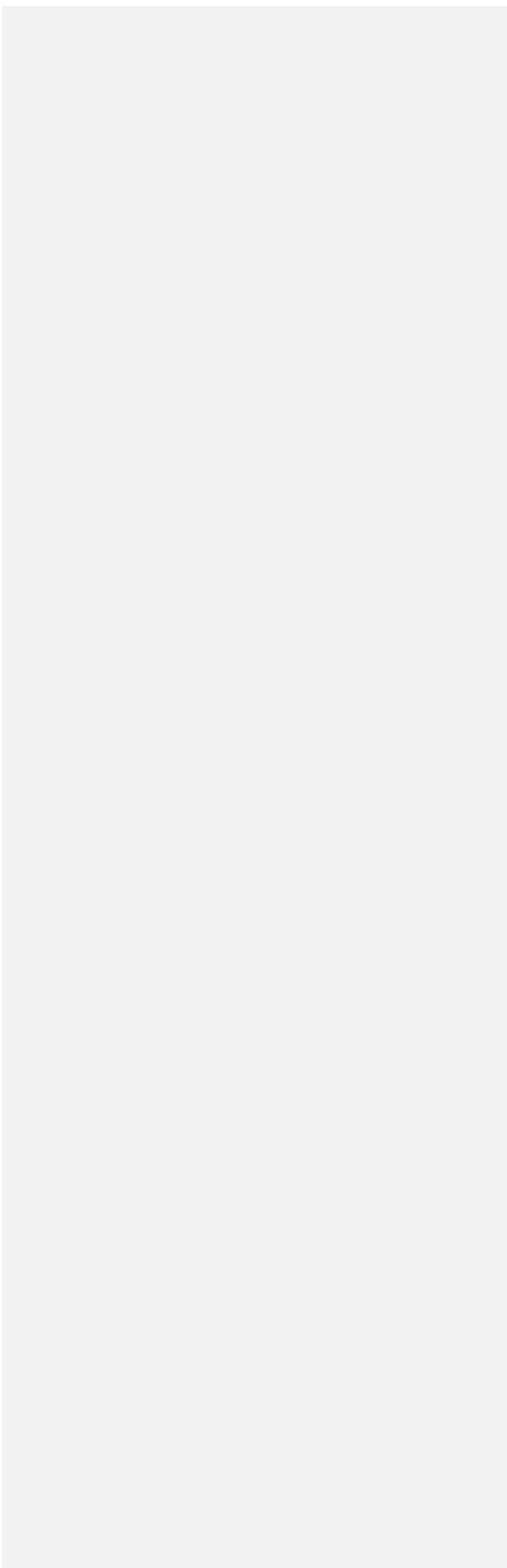
5 **Q. Please describe the Settlement's term addressing Production Tax Credits.**

6 A. The Settlement includes an update on the Production Tax Credits returned to  
7 customers, which further reduces the Company's request by more than \$764,000.  
8 Again, customers will still ultimately pay increased rates, but it is reasonable to  
9 accept the additional Production Tax Credit return to PacifiCorp's customers.

10 **Q. Are there any additional issues Public Counsel would like to address?**

11 A. Yes, I would like to address the power cost update in the compliance filing and  
12 the overall rate impact of the Settlement. First, the Settling Parties agreed to an  
13 update of power costs based on forward price curves. Although the details of this  
14 update are not yet filed or included in the Company's power cost-related rate  
15 adjustments, it is important to note the potential impact on PacifiCorp's  
16 customers.

17 To that end, Public Counsel recognizes the impact on customers as a result  
18 of the Settlement. As the Settlement entails, without accounting for the rate  
19 impact resulting from the post-order update, customer rates will increase. In the  
20 midst of the COVID-19 pandemic and associated economic crisis, Public Counsel  
21 is sensitive to any increases in customer rates. Customers experiencing financial  
22 hardship may have additional challenges as a result of the rate increases included  
23 in the Settlement Agreement.



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

2 **A. Yes, it does.**