BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

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

Respondent.

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

Exhibit CJD-1Tr

November 5, 2021

Revised November 8, 2021
Q. Please state your employer and business address.


Q. On whose behalf are you testifying?

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

Q. Have you previously testified in this proceeding?

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

Q. Please state your qualifications.

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

My current employment with Public Counsel began in October 2016. Since joining the Attorney General’s Office, I have worked on a variety of energy, transportation, and telecommunications matters, including Avista’s 2019 General Rate Case (Dockets UE-190334, UG-190335 and UE-190222), Lugg’s 2020 Complaint (Docket TV-200029), WasteXpress’s 2020 Complaint (Docket
TG-200131), Dolly’s Petitions for Household Goods Mover Permits (Dockets TV-190593 and TV-190594), CenturyLink’s 2017 911 Outage Complaint (Docket UT-190209), Cascade’s 2017 General Rate Case (Docket UG-170929), Puget Sound Energy’s 2017 General Rate Case (Dockets UE-170033 and UG-170034), Avista’s 2017 General Rate Case (Dockets UE-170485 and UG-170486), the Puget Sound Energy Greenwood Explosion Complaint (Docket PG-160924), Pacific Power’s Schedule 300 Tariff Revision case (Docket UE-161204), the CenturyLink-Level3 Merger (Docket UT-170042), Cascade Natural Gas Company’s 2017 General Rate Case (Docket UG-170929), the Avista-Hydro One Merger (Docket U-170970), Avista’s 2018 Depreciation Petition (Dockets UE-180167 and UG-180168), CenturyLink’s 2017 911 Outage Complaint (Docket UT-190209), the 2019 Avista Remand (Dockets UE-150204, UG-150205).

I testified on behalf of Public Counsel in the 2020 Northwest Natural Gas Company General Rate Case (Docket UG-200994), 2020 Avista General Rate Case Settlement (Dockets UE-200900 and UG-200901), 2019 PacifiCorp General Rate Case Settlement (Docket UE-191024), 2019 Avista General Rate Case Partial Settlement (Dockets UE-190334 and UG-190335), in support of the settlement regarding the merger of CenturyLink and Level3 Communications (Docket UT-170042) in May 2017, on low-income issues in Cascade’s General Rate Case (Docket UG-170929), and in the Avista-Hydro One Merger Settlement (Docket U-170970).
Beyond adjudications, I have worked on rulemakings, low-income rate assistance, energy conservation, and integrated resource plan (IRP) issues for multiple Washington utilities. In particular, I have been involved in several rulemakings, including the Intervenor Funding Policy (Docket U-210595), Clean Energy Transformation Act (CETA) Integrated Resource Planning (IRP) Rulemaking (Docket UE-190698), CETA Energy Independence Act Rulemaking (Docket UE-190652), CETA Clean Energy Implementation Plan Rulemaking (Docket UE-191023), CETA Purchases of Electricity Rulemaking (Docket UE-190837), generic Cost of Service Collaborative (Dockets UE-170002 and UG-170003), and IRP Rulemaking (Docket U-161024). Additionally, I participate in conservation advisory groups for Puget Sound Energy and Cascade Natural Gas, as well as the Northwest Natural Gas IRP Technical Working Group, Cascade IRP Technical Advisory Committee, and the Avista IRP Technical Advisory Committee. I also participate in low-income advisory groups for Cascade Natural Gas, Puget Sound Energy, and Avista. More recently, I have observed the Puget Sound Energy Equity Advisory Group and participated in Avista’s and Puget Sound Energy’s CEIP Advisory Groups.

Q. What is the purpose of your testimony?

A. I am testifying to address the terms of the Full Multi-Party Settlement on PacifiCorp’s Power Cost Only Rate Case (PCORC). PacifiCorp (or “Company”), Commission Staff, Walmart, and The Energy Project have all joined the Settlement and will be referred to collectively as the “Settling Parties.”
Alliance for Western Energy Consumers (AWEC) opposes the Settlement Agreement as filed.

Q. Please briefly describe the Settlement Agreement.
A. The PCORC proceeding was filed pursuant to the settlement of PacifiCorp’s general rate case in Docket UE-191024.\(^1\) The Full Multi-Party Settlement in this proceeding resolves all issues in this proceeding including a reset of PacifiCorp’s Net Power Cost (NPC) baseline, provides an adjustment for load production factor and disposition of production tax credits, defers major maintenance expenses at Colstrip Unit 4, and provides for an update to the NPC baseline in a compliance filing after the Washington Utilities and Transportation Commission ("Commission") issues an order on this settlement.

Q. What is Public Counsel’s position on the Settlement?
A. Public Counsel is not a party to the Settlement. Public Counsel neither supports nor opposes the agreement reached by the Settling Parties.

Q. Are there specific issues Public Counsel would like to address as reasonable in the Settlement Agreement?
A. Yes, there are two components of the Settlement that I believe are reasonable:
   - The load production factor adjustment; and
   - The disposition of the Production Tax Credits.

Q. Please describe the Settlement’s load production factor adjustment.
A. The Settlement revises the load production factor, as compared to the Company’s initial filing. Under the Settlement, the load production factor is reduced by a total

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

Q. Please describe the Settlement’s term addressing Production Tax Credits.

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

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

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

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

A. Yes, it does.