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November 27, 2023

Via Electronic Mail

Jocelyn Pease
McDowell Rackner Gibson PC
419 SW 11th Avenue, Suite 400
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jocelyn@mrg-law.com

Re: *In the Matter of WUTC v. PacifiCorp d/b/a Pacific Power & Light Company*,
Docket UE-230172; and
In the Matter of Alliance of Western Energy Consumers,
Petition for Order Approving Deferral of Increased Fly Ash Revenues,
Docket UE-210852 (Consolidated)

Dear Ms. Pease:

Please find enclosed the Alliance of Western Energy Consumers' Response to PacifiCorp's Sixth Set of Data Requests in the above-referenced dockets.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/ Anna V. Congdon
Anna V. Congdon

Enclosure

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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|--|---|--------------------------------|
| WASHINGTON UTILITIES AND |) | DOCKET UE-230172 |
| TRANSPORTATION COMMISSION |) | <i>(Consolidated)</i> |
| |) | |
| Complainant, |) | |
| |) | |
| v. |) | ALLIANCE OF WESTERN ENERGY |
| |) | CONSUMERS' RESPONSE TO |
| |) | PACIFICORP'S SIXTH SET OF DATA |
| PACIFICORP d/b/a PACIFIC POWER & |) | REQUESTS |
| LIGHT COMPANY, |) | |
| |) | |
| Respondent. |) | |
| <hr/> | | |
| In the Matter of |) | DOCKET UE-210852 |
| |) | <i>(Consolidated)</i> |
| ALLIANCE OF WESTERN ENERGY |) | |
| CONSUMERS, |) | |
| |) | |
| Petition for Order Approving Deferral of |) | |
| Increased Fly Ash Revenues. |) | |
| <hr/> | | |

Dated: November 27, 2023

The Alliance of Western Energy Consumers (“AWEC”) Responds to PacifiCorp’s Sixth Set of Data Requests as follows. Subject to the objections below, AWEC will provide responses and responsive documents to PacifiCorp’s Sixth Set of Data Requests. Further, any future responses and responsive documents from AWEC will also be subject to the objections below.

GENERAL OBJECTIONS

1. AWEC objects to the instructions set forth in PacifiCorp's Data Requests to the extent that these instructions impose obligations on AWEC that exceed, are unauthorized by, or are inconsistent with the discovery rules.

2. AWEC objects to the request to the extent that the data requested is not relevant to the issues identified in this proceeding.

3. AWEC objects to the request to the extent that production of the data requested would be unduly burdensome and that the request is overly broad.

4. AWEC objects to the request to the extent that production of the requested data would reveal information protected by the attorney-client privilege, and/or the work product doctrine, and/or any other relevant privilege.

5. Each of the preceding general objections is incorporated by reference in each specific response below.

PACIFICORP DATA REQUEST NO. 28 TO AWEC:

Topic: Production Tax Credit

Refer to Mullins, Exh. BGM-1T, page 4, Table BGM-1. Is AWEC continuing to recommend adjustment A8 “PTC Rate at 3.0 Cents/KWh,” which is explained further on pages 49, line 6 to 52, line 16? If AWEC continues to recommend this adjustment, what is the basis for AWEC’s continued recommendation?

RESPONSE TO PACIFICORP DATA REQUEST NO. 28:

AWEC’s most recent PTC forecast is attached as Attachment PAC 28. Based on that response, AWEC is continuing to recommend that the PTC rate be increased to 3.0 cents per kWh in revenue requirement for both rate years. More recent issuances from the Bureau of Economic Analysis suggest it is unlikely that the PTC rate will increase to 3.0 cents per kWh in 2024. However, it is virtually certain that the PTC rate will increase to 3.0 cents per kWh in 2025. The annualized change in the GDP Implicit Price Deflator would have to be less than 0.60% for the PTC rate to remain at 2.9 cents per kWh in 2025. AWEC assesses the likelihood of such a low inflationary rate to be almost impossible, given current inflationary trends.

Because the rate effective period for Rate Year 1 includes approximately three months in 2025, AWEC continues to recommend that the PTC rate calculations reflect the higher 3.0 cents per kWh rate for three months. Absent such treatment, ratepayers will not recognize the offsetting benefits associated with the PTC rate increase in 2025 for those months. Further, AWEC is continuing to recommend that PTCs for the entirety of Rate Year 2 be calculated based on a 3.0 cents per kWh rate.

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Date: November 27, 2023
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