Exhibit BGM-4 Docket UE-210402 Witness: Bradley G. Mullins

## **BEFORE THE**

# WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UITILITIES AND	)
TRANSPORTATION COMMISSION	)
	)
Complainant,	)
-	)
V.	)
	)
PACIFICORP d/b/a PACIFIC POWER &	)
LIGHT COMPANY,	)
	)
Respondent.	)
-	)

DOCKET UE-210402

# **EXHIBIT BGM-4**

## **BRIDGER EXPECTED FLY ASH SALES REVENUES**

UE 390 / PacifiCorp August 23, 2021 AWEC Data Request 039

### **AWEC Data Request 039**

Reference PAC/1000, Staples/54:3-56:7: In Idaho Public Utilities Commission Case No. PAC-E-21-07, Rocky Mountain Power Exhibit 40, Page 57, PacifiCorp identifies an adjustment to ash sales revenues to the 12 months ending 2021. Please provide work papers supporting the \$15,761,142 of ash sales forecast in the referenced exhibit, including normalization adjustments for the Craig, Naughton, and Cholla plants. Please also provide a narrative explanation of how the forecast was developed.

#### **Response to AWEC Data Request 039**

PacifiCorp objects to this request as outside the scope of this proceeding and not reasonably calculated to lead to admissible evidence in this proceeding. An element of revenue requirement in a general rate case in another jurisdiction is not relevant to PacifiCorp's Oregon TAM proceeding. Without waiving the foregoing objection, PacifiCorp responds as follows:

Please refer to Attachment AWEC 039 for the requested information.

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.

#### 2021 Flyash & Byproduct Sales Forecast

Plant	2021 Ash Sales Forecast	Forecast Methodology
Craig	\$ 155,000	Forecast provided by Tri-State G&T, the Craig plant operator
Dave Johnston	\$ 45,000	Forecast is based on historical results of flyash & byproduct sales from Dave Johnston plant
Hunter	\$ 39,000	Forecast is based on historical results of flyash & byproduct sales from Hunter plant
Huntington	\$ 1,490,000	Forecast is based on contract terms and projected fly-ash sales volumes
Jim Bridger	\$ 13,895,142	Forecast is based on contract terms and projected fly-ash sales volumes
Naughton	\$ 137,000 \$ 15,761,142	_Forecast is based on historical results of flyash & byproduct sales from Naughton plant _