

UE-220789 / PacifiCorp  
January 17, 2023  
WUTC Informal Data Request 1

### **WUTC Informal Data Request 1**

The Climate Commitment Act (CCA) incorporates a 2,000 MWh Yakima qualifying facility (QF) that was “too small” for the Clean Energy Implementation Plan (CEIP)...are these the hydro plants in lines 111 and 112 of the confidential work papers? Please clarify why this QF is “too small” for CEIP?

### **Response to WUTC Informal Data Request 1**

The Yakima Tieton Cowiche and the Yakima Tieton Orchard qualifying facilities (QF) were not included as a generating resource in PacifiCorp’s 2021 Integrated Resource Plan (IRP) PLEXOS model due to the timing of the execution of renewed contracts. The list of contracted resources had to be finalized in early 2021 to begin model runs in a timely manner for the 2021 IRP. However, the Yakima Tieton (Cowiche and Orchard) QFs were included as resources for the Climate Commitment Act (CCA) forecast as a post-IRP modelling adjustment.

Referencing the confidential work paper accompanying PacifiCorp’s CCA petition requesting approval of forecasts pursuant to RCW 70A.65.120, specifically confidential file “220789-PAC-Revised-CCA-Pet-1-5-23”, tab “(1.1) Gen Allocation CONF”, Yakima Tieton Cowiche and Yakima Tieton Orchard are the hydro resources reflected on row 111 and 112, respectively.

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WUTC Informal Data Request 2

**WUTC Informal Data Request 2**

Which are the renewable energy credit (REC) generating resources that are relevant for the Clean Energy Implementation Plan (CEIP) and not the Climate Commitment Act (CCA)?

**Response to WUTC Informal Data Request 2**

There are no renewable energy credit (REC) generating resources that are relevant for the Clean Energy Implementation Plan (CEIP) and not the Climate Commitment Act (CCA).

PREPARER: Zepure Shahumyan

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### WUTC Informal Data Request 3

The most recently approved Washington Inter-Jurisdictional Allocation Methodology (WIJAM) has been used for 2024-2026, which departs from the tentative methodology used for the Clean Energy Implementation Plan (CEIP), and thus year 2023 in the forecast. This is clear in the petition, but please summarize in a list and/or Microsoft Excel table, along with these other changes.

### Response to WUTC Informal Data Request 3

Please refer to the table below which provides for the Multi-State Process (MSP) allocation assumptions in each of PacifiCorp's Climate Commitment Act (CCA) forecast and PacifiCorp's Clean Energy Implementation Plan (CEIP):

<b>Allocation Assumptions for CCA</b>	<b>Allocation Assumptions for CEIP</b>
Dynamic system allocation factors based on revenue requirement forecast	Fixed factors for system resources
Chehalis was modeled on an updated system generation (SG) allocation factor, depending on year.	Chehalis was assumed to be allocated on a system generation (SG) allocation factor in 2023, and 100 percent starting in 2024
Assumed coal phased out starting in 2026	Assumed coal phased out starting in 2024
Non-emitting resources are allocated using system generation (SG) allocation factor	Non-emitting resources are allocated on system generation (SG) allocation factor, except proxy resources in 2024, 2025, 2026 were allocated to Washington on an assigned production (AP) allocation factor: a calculated fixed factor based on Washington load and resource balance in the year the proxy resource is built
Yakima Tieton (Cowiche and Orchard) facilities allocated situs to Washington	Yakima Tieton (Cowiche and Orchard) facilities were not included in PacifiCorp's 2021 Integrated Resource Plan (IRP) portfolio. Please refer to the Company's response to WUTC Informal Data Request 1.

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#### **WUTC Informal Data Request 4**

In the work paper, Chehalis appears to be allocated at 22%. Please confirm this is a departure from Clean Energy Implementation Plan (CEIP), which allocated Chehalis at 100%. Please explain the rationale.

#### **Response to WUTC Informal Data Request 4**

The Company’s four-year demand and resource forecast for the 2023-2026 Climate Commitment Act (CCA) compliance period allocates to Washington between 22.06 percent and 22.26 percent of Chehalis, depending on the year, whereas PacifiCorp’s Clean Energy Implementation Plan (CEIP) assumed that Chehalis would be allocated at a 22.97 percent in 2023, and transition to 100 percent between 2024-2026. This reflects that the Company’s CCA forecast uses a more recent system generation (SG) allocation factor forecast for 2023, relative to the CEIP, and 2024-2026 uses the allocations within the Washington Inter-jurisdictional Cost Allocation Methodology (WIJAM), whereas the CEIP assumed “a tentative proposed future allocation methodology for resources added in 2024 and beyond.”<sup>1</sup>

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<sup>1</sup> PacifiCorp’s 2021 Clean Energy Implementation Plan (CEIP), Docket UE-210829, Final CEIP at 13 (December. 30, 2021).

## **WUTC Informal Data Request 5**

**Meeting held on December 15, 2022 (hosted by Ajay Kumar)** – WUTC staff believes it was stated that the assumption in the Climate Commitment Act (CCA) forecast was that coal units will remain in rates until 2025. Is WUTC staff’s understanding correct? This is also departure from Clean Energy Implementation Plan (CEIP), is that correct? Note: WUTC staff is still considering this point. WUTC staff will be making sure to clarify with the WUTC commissioners that accepting this assumption does not preempt a decision in the CEIP or general rate case (GRC) realm, and that, as stated in PacifiCorp’s petition, PacifiCorp may need to file an update once a decision is made in those arenas.

## **Response to WUTC Informal Data Request 5**

Pursuant to WAC 173-446-230(2)(c)(v), the Company’s four-year demand and resource forecast for the 2023-2026 Climate Commitment Act (CCA) compliance period uses the Washington Interjurisdictional Cost Allocation Method (WIJAM). The WIJAM was approved as the Company’s current multi-state process (MSP) allocation methodology for Washington in Docket UE-191024 and represents how resources will be allocated to Washington during the CCA compliance period. The Company has requested that the Washington Utilities and Transportation Commission (WUTC) allow the Company to update the forecast as needed based on any future cost allocation methodology that may be approved by the WUTC.<sup>1</sup> Consistent with the WIJAM, the four-year demand and resource forecast removes all costs and benefits associated with coal-fired resources by December 31, 2025. The WIJAM allocated resources departs from the Clean Energy Implementation Plan (CEIP) starting in 2024, in that the CEIP assumed “a tentative proposed future allocation methodology for resources added in 2024 and beyond.”<sup>2</sup> In particular, CEIP assumed that “[c]oal resources were removed from Washington rate base in 2024 and beyond.”<sup>3</sup>

PacifiCorp is also aware that in the Notice Requiring Petitions Requesting Approval of Forecasts Pursuant to RCW 70A.65.120, issued on September 30, 2022, the WUTC provided that “approval of any forecasts based on a filed, but not approved CEIP or IRP for purposes of approving forecasts for determining no-cost allowances under the CCA does not imply nor should be considered to be approval of any CEIP or element of a CEIP currently pending before the Commission”.

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<sup>1</sup> In the matter of PacifiCorp d/b/a Pacific Power & Light Company (PP&L), Petition for Approval of Demand and Resource Supply Forecasts, Docket UE-220789, Petition of PacifiCorp Requesting Approval of Forecasts Pursuant to RCW 70A.65.120 ¶ 13 (October 28, 2022).

<sup>2</sup> In re PacifiCorp’s 2021 Clean Energy Implementation Plan (CEIP), Docket UE-210829, Final CEIP at 13 (December 30, 2021).

<sup>3</sup> Id. at 14.

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