

Exh. CRM-3

Dockets UE-230172 and UE-210852

Witness: Chris R. McGuire

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**PACIFICORP d/b/a PACIFIC POWER
AND LIGHT COMPANY,**

Respondent.

**DOCKETS UE-230172 and
UE-210852 (Consolidated)**

In the Matter of

**ALLIANCE OF WESTERN ENERGY
CONSUMERS'**

**Petition for Order Approving Deferral of
Increased Fly Ash Revenues**

EXHIBIT TO TESTIMONY OF

CHRIS R. MCGUIRE

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PacifiCorp Responses to UTC Staff Data Request Nos. 16-17

September 14, 2023

UE-230172 / PacifiCorp
May 26, 2023
WUTC Data Request 16

WUTC Data Request 16

RE: Jim Bridger Units 1 and 2 - The testimony of Thomas Burns states that: “Consistent with the Company’s 2021 IRP, the Company assumes the converted Jim Bridger Units 1 and 2 will serve Washington customers until the end of 2029, and serve PacifiCorp’s other service territories through 2037.” Burns, Exh. TRB-1CTr at 4:15-17.

Please provide all documentation supporting the Company’s estimated end of service life of 2037 for the converted Jim Bridger Units 1 and 2.

Response to WUTC Data Request 16

Jim Bridger Unit 1 and Jim Bridger Unit 2 end of service life, December 31, 2037, for PacifiCorp’s other service territories, is based on the Company’s 2018 Depreciation Study. For ease of reference, please refer to Attachment WUTC 16, which provides a copy of PacifiCorp’s 2018 Depreciation Study (Calculated Annual Depreciation Accruals related to Electric Plant as of December 31, 2017) prepared by Gannett Fleming. Note: this document was filed with the Washington Utilities and Transportation Commission (WUTC) on September 13, 2018, in Docket UE-180778, specifically Exhibit JJS-3 to the direct testimony of Company witness, John J. Spanos.

By converting Jim Bridger Unit 1 and Jim Bridger Unit 2 from coal-fueled to gas-fueled, the service life is then updated for the Jim Bridger plant that retires end of 2037. The service life reflects the operational consideration of meeting system reliability requirements over this time.

PREPARER: Dan Swan

SPONSOR: Thomas R. Burns

UE-230172 / PacifiCorp
May 26, 2023
WUTC Data Request 17

WUTC Data Request 17

RE: Jim Bridger Units 1 and 2 - The testimony of Sherona Cheung states that: “the Company is proposing to extend the depreciable lives for Jim Bridger Unit 1, Unit 2, and its common assets to December 2029. This date was chosen to align with the date by which retail sales of electricity in Washington must be greenhouse gas neutral.” Cheung, Exh. SLC-1T at 15:5-8.

Given that the options for compliance available to the Company under RCW 19.405.040(1)(b) allow for the continued use of the converted Jim Bridger Units 1 and 2 to serve Washington customers beyond 2029 (“through December 31, 2044, an electric utility may satisfy up to twenty percent of its compliance obligation under (a) of this subsection with an alternative compliance option consistent with this section”), please explain why the Company does not propose to extend the depreciable lives of those units to serve Washington customers after December 2029.

Response to WUTC Data Request 17

While Revised Code of Washington (RCW) 19.405.040(1)(b) allows for up to 20 percent of its compliance obligation to be satisfied with an alternative compliance option, the amount of generation currently allocated to Washington from Jim Bridger Unit 1 and Jim Bridger Unit 2 would exceed 20 percent. In addition, alternative compliance may be necessary to cover non-emitting electricity contracts where the Company does not retain the non-power attributes as required by RCW 19.405.040(1)(f).

PREPARER: Zepure Shahumyan

SPONSOR: Zepure Shahumyan