

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP D/B/A PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKETS UE-230172 and UE-210852 (Consolidated)

**CROSS EXAMINATION EXHIBIT OF ALLEN L. BERRETH
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT ALB-__X

PacifiCorp Response to Public Counsel Data Request No. 280, with attachment

December 4, 2023



825 NE Multnomah, Suite 2000
Portland, Oregon 97232

November 21, 2023

Lisa W. Gafken
Assistant Attorney General, Unit Chief
Public Counsel Unit

RE: **WA UE-230172**
PC Data Request (277-289)

Please find enclosed PacifiCorp's Responses to PC Data Request 277-289 and Attachments PC 278 and 280. Provided via BOX is Confidential Attachment PC 277. Designated information is confidential per Protective Order in UTC Docket UE-230172

If you have any questions, please call me at 503-813-5410.

Sincerely,

 /s/
Ariel Son
Regulatory Affairs Manager

UE-230172 / PacifiCorp
November 21, 2023
PC Data Request 280

PC Data Request 280

Re: Accounting. Regarding Rebuttal Testimony of Allen L. Berreth, Exhibit ALB-3T at 2, Table 1, please break down the “Wildfire Mitigation and Vegetation Management Activity” costs between Distribution and Transmission, similar to the total company breakdown provided on page 135 of Sherona L. Cheung, Exhibit SLC-4.

Response to PC Data Request 280

Table 1 in Exhibit ALB-3T at 2 represent the Washington-allocated equivalent of the total-Company figures reflected on page 135 of Exhibit SLC-4.

Please refer to Attachment PC 280 which provides the requested break down of amounts between distribution and transmission in the same format as on page 135 of Exhibit SLC-4.

Note: In preparing the responses to this set of data requests on wildfire mitigation and vegetation management expenses from Public Counsel, the Company observed a mis-categorization of costs originally presented on page 135 of Exhibit SLC-4, and subsequently in Table 1 of Exhibit ALB-3T. Specifically “PP Vegetation – Admin.” costs inadvertently included “Situational Awareness – Subscription & Software” amounts. Attachment PC 280 provides a corrected categorization. Expense amounts in total reflected in the Company’s filing remains accurate, this correction is limited to a categorical error.

PREPARER: Sherona L. Cheung

SPONSOR: Allen L. Berreth

**ATTACHMENT TO PACIFICORP RESPONSE TO PUBLIC COUNSEL DATA
REQUEST NO. 280**

AS FILED

Total Company Wildfire & Vegetation Management O&M - Exh. No. SLC-4

Description	Function	FERC	Base Period	Test Period	Incremental
			12 ME Jun 2022	12 ME Dec 2024	Adjustment
PP Vegetation - Admin.	System	593SNPD	1,569,444	2,130,749	561,305
	System	580SNPD	2,278,239	4,959,818	2,681,579
Wildfire & Vegetation Management Activity	Distribution	593WA	3,457,552	5,232,185	1,774,633
	Transmission	571SG	5,751,706	10,559,572	4,807,866
Contractor Costs Increase & NESC 'B' Condition Correction Implementation	Distribution	593WA	8,384,003	10,035,031	1,651,028
	Transmission	571SG	1,384,515	1,534,569	150,054
			22,825,459	34,451,924	11,626,465

Allocation Factors

SNPD 6.264%
 SG 7.979%

Washington-Allocated Wildfire & Vegetation Management O&M - Exh. No. ALB-3T

Description	Function	FERC	Base Period	Test Period	Incremental	Increase
			12 ME Jun 2022	12 ME Dec 2024	Adjustment	%
PP Vegetation - Admin.	System	593SNPD	98,310	133,471	35,160	
	System	580SNPD	142,710	310,684	167,975	84%
Wildfire & Vegetation Management Activity	Distribution	593WA	3,457,552	5,232,185	1,774,633	
	Transmission	571SG	458,916	842,525	383,609	55%
Contractor Costs Increase & NESC 'B' Condition Correction Implementation	Distribution	593WA	8,384,003	10,035,031	1,651,028	
	Transmission	571SG	110,467	122,440	11,972	20%
			12,651,958	16,676,335	4,024,378	32%

CORRECTED

Total Company Wildfire & Vegetation Management O&M - Exh. No. SLC-4

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			12 ME Jun 2022	12 ME Dec 2024	Adjustment
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Situational Awareness - Subscription & Software	System	580SNPD	2,278,239	4,959,818	2,681,579
Wildfire & Vegetation Management Activity	Distribution	593WA	3,457,552	5,232,185	1,774,633
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Allocation Factors

SNPD	6.264%
SG	7.979%

Washington-Allocated Wildfire & Vegetation Management O&M - Exh. No. ALB-3T

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