

Exh. JDW-16

Dockets UE-230172 and UE-210852

Witness: John D. Wilson

**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

JOHN D. WILSON

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

PacifiCorp Response to UTC Staff Data Request No. 100

September 14, 2023

UE-230172 / PacifiCorp
July 27, 2023
WUTC Data Request 100

WUTC Data Request 100

Power Costs - With respect to 230172-PAC-RJM-GNwWheeling (C), tab BPA Rate Case, please confirm that the BP-24 initial rates are identical to the BP-22 rates as shown, or provide a correction, and provide any necessary explanation or supporting documentation. Please also respond to the following potential formula errors.

- (a) BPA Wheel J.Bridger, row 143, columns AW:BH, instead of $\$X\$106/\$V\106 should the formula instead read $\$Z\$106/\$X\106 ?
- (b) DC INTERTIE WHL-FIRM, row 144, columns AW:BH, instead of $\$X\$92/\$V\92 should the formula instead read $\$Z\$92/\$X\92 ? Also, this row is referenced to both Sections E and B. Please explain the reference to Section B (row 69) and why the formula does not appear to directly or indirectly reference these data.
- (c) MONTANA INTERTIE PTP, row 145, columns AW:BH, instead of $\$V\$83/\$S\83 should the formula instead read $\$Y\$83/\$V\83 ?
- (d) VANTAGE NTWK TRANS, row 147, columns AW:BH, instead of $\$V\77 should the formula instead read $\$Y\77 ?

Response to WUTC Data Request 100

Referencing confidential file “230172-PAC-RJM-GNwWheeling (C)”, tab “BPA Rate Case”, the Company confirms that the Bonneville Power Administration (BPA) BP-24 initial rates are identical to the BPA BP-22 rates as shown. Please refer to Confidential Attachment WUTC 100-1, which provides a copy of BPA’s Initial Proposals for a BP-24 Rates Settlement Agreement issued in December 2022, specifically pages 7-38.

- (a) In reference to the formulas in row 143, columns AW:BE are correct, and the formulas in columns BF:BH should be corrected to read $\$Z\$106/\$X\106 . Additionally, the formulas in columns BI:BT should be corrected to read $\$Z\$106/\$X\106 .
- (b) In reference to the formulas in row 144, columns AW:BE are referencing the correct columns X and V, and the formulas in columns BF:BH should be corrected to reference columns Z divided by column X. Additionally, the formulas in columns BI:BT should be corrected to reference column Z divided by column X.

Regarding row 144, cell A144 incorrectly lists both sections E and B. It should only list section B. During the process of preparing the response to this

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data request, an error was discovered in the formulas in row 144; after 2021 the formulas should reference section B, and not section E.

The direct current (DC) Intertie Formula Power Transmission (FPT) contract valued in section E was converted to point-to-point (PTP) in 2021 therefore there are no longer FPT costs associated with the DC Intertie. The rates remain on the worksheet in section E but are not currently in effect. Please refer to Confidential Attachment WUTC 100-2 which provides supporting documentation.

(c) In reference to the formulas in row 145, columns AW:BE are correct, and the formulas in columns BF:BH should be corrected to read $\$Z\$92/\$X\92 . Additionally, the formulas in columns BI:BT should be corrected to read $\$Z\$92/\$X\92 .

(d) In reference to the formulas in row 147, columns AW:BE are correct, and the formulas in columns BF:BH should be corrected to read $\$Y\77 . Additionally, the formulas in columns BI:BT should be corrected to read $\$Y\77 .

Designated information in Confidential Attachment WUTC 100-1 and Confidential Attachment WUTC 100-2 is confidential per Protective Order in UTC Docket UE-230172.

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