

**Exh. MAB-2**

**Dockets UE-230172 and UE-210852**

**Witness: Molly A. Brewer**

**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**

**MOLLY A. BREWER**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PacifiCorp's Response to UTC Staff Data Request No. 23*

**September 14, 2023**

UE-230172 / PacifiCorp  
June 28, 2023  
WUTC Data Request 23

### **WUTC Data Request 23**

**Equity** - Please provide any documents that show how PacifiCorp conducts its capital planning processes or procedures as discussed in a meeting with Commission Staff on June 5, 2023.

In this context, ‘capital planning processes and procedures’ refers to the methods PacifiCorp uses to identify system needs, assign monetary value to both monetary and non-monetary benefits, prioritize and optimize capital projects, weigh alternatives against criterion, conduct benefit cost analysis, and decide on a final capital portfolio to receive funding.

### **Response to WUTC Data Request 23**

PacifiCorp objects to the extent that this data request assumes an evidentiary standard mandating the creation, retention, and/or production of certain documentation. Without waiving the foregoing objection, PacifiCorp responds and follows:

Below are examples of documents that illustrate how PacifiCorp incorporates equity into its capital planning processes.

Please refer to the 2022 All Source Request For Proposals (2022AS RFP) documents listed below which demonstrate how equity principles are incorporated into PacifiCorp’s capital planning procedures and its business practices with respect to energy supply procurement. These documents are available at: <https://www.pacificorp.com/suppliers/rfps/2022-all-source-rfp/RFP-documents-appendices.html>

- 2022AS RFP Main Document
- Appendix E-2.1 PPA Documents – Generating Resource Only
- Appendix L Non-Price Scoring Matrix
- Appendix P Equity Questionnaire

These RFP documents are consistent with PacifiCorp’s commitments made in PacifiCorp’s Clean Energy Implementation Plan (CEIP), Chapter 3, which included the following sections:

Supply-side Action Items – 2022AS RFP Action Items: Equity and Customer Impacts

Washington Clean Energy Transformation Act (CETA) and customer benefit indicator (CBI) Evaluation of Action Items

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Furthermore, representatives from PacifiCorp's energy supply procurement team have been actively engaged in various advisory group meetings, including the equity advisory group (EAG) meetings. Within these meetings, PacifiCorp has requested the dissemination of Request for Proposal (RFP) details among their networks and sought assistance from the advisory group in reaching out to potential bidders or resource suppliers. The primary objective of these outreach efforts is to promote equitable participation in the bidding process by encouraging submissions from nonprofit organizations and underrepresented bidders, such as minority-, women-, disabled-, and veteran-owned businesses. Documents related to the relevant meetings can be accessed through the following links:

1. 5/13/2021 - EAG Meeting: [PacifiCorp EAG Meeting 5.13.2021](#)
2. 9/14/2021 - CEIP Technical Conference: [9.14.2021 CEIP Technical Workshop \(pacificorp.com\)](#)
3. 9/15/2021 – EAG Meeting: [Clean Energy Transformation Act Washington Equity Advisory Group Fifth EAG Meeting September 15, 2021 \(pacificorp.com\)](#)
4. 10/12/2021 – Demand Side Management (DSM) Advisory Group Meeting: [PowerPoint Presentation \(pacificorp.com\)](#)
5. 10/20/2021 – EAG Meeting: [Clean Energy Transformation Act Washington Equity Advisory Group Fifth EAG Meeting September 15, 2021 \(pacificorp.com\)](#)
6. 11/10/2021 – CEIP Technical Conference: [WA CEIP Third Technical Meeting.pdf \(pacificorp.com\)](#)
7. 11/10/2021 – CEIP Public Participation Meeting: [CETA – What's Coming Up? \(pacificorp.com\)](#)
8. 11/17/2021 – EAG Meeting: [Clean Energy Transformation Act Washington Equity Advisory Group Fifth EAG Meeting September 15, 2021 \(pacificorp.com\)](#)
9. 1/19/2022 – EAG Meeting: [Clean Energy Transformation Act Washington Equity Advisory Group Fifth EAG Meeting September 15, 2021 \(pacificorp.com\)](#)
10. 2/28/2022 – EAG Meeting: [PowerPoint Presentation \(pacificorp.com\)](#)
11. 3/16/2022 – EAG Meeting: [EAG Meeting March Slides.pdf \(pacificorp.com\)](#)
12. 4/28/2022- DSM Advisory Group Meeting: [PowerPoint Presentation \(pacificorp.com\)](#)

With regard to the transmission capital planning process, PacifiCorp plans its system in a manner to provide reliable and equitable transmission to its customers, in accordance with Washington law. The transmission capital plan is driven by various transmission planning studies performed in support of Open Access Transmission Tariff (OATT) requirements, Federal Energy Regulatory

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Commission (FERC) policies, North American Electric Reliability Corporation (NERC) Reliability Standards compliance and additional distribution and transmission system concerns as detailed in the Direct Testimony of Richard A. Vail, pages 5-9. Projects identified in these transmission planning studies are prioritized for funding in the capital plan based on criteria including NERC and FERC regulatory compliance requirements, Open Access Transmission Tariff (OATT) requirements, estimated cost, schedule, exposure risk, magnitude of load loss, load shedding exposure, customer outage durations, load restoration capabilities and capacity added. When a project is identified as having sufficient priority and need, an Appropriation Request (APR) is created to request capital funding to proceed with the project, supported by an Investment Appraisal Document (IAD) that describes the project need and evaluates the estimated cost and schedule of the proposed solution and alternatives.

When certain large major transmission projects that require new high voltage transmission lines are identified through the capital planning process, the Company conducts a route study to gather stakeholder feedback, assess the environmental and customer impact of each project and ensure compliance with local, state and federal permitting requirements. Please refer to Attachment WUTC 23, which provides a template route study.

PacifiCorp also engages with local stakeholders pertaining to certain investments associated with hydroelectric assets that are under FERC jurisdiction that ultimately influence capital planning decisions. The record of engagement is voluminous and can be found at each hydroelectric facility webpage at the link below.

[Hydro \(pacificorp.com\)](#)

For example, at the Lewis River, documentation of local stakeholders input can be found at links associated with “Relicensing Documents” and all sections under “License Implementation” from the link below.

[Lewis River \(pacificorp.com\)](#)

PREPARER: Various

SPONSOR: To Be Determined