

**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

**COREY J. DAHL
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT CJD-7

PacifiCorp Response to Public Counsel Data Request 236

September 14, 2023

PC Data Request 236

Re: Equity/Plant Investments - RY1. Direct Testimony of Richard A. Vail, Exh. RAV-1T, at 27:2–10. Please respond to the following in detail:

- (a) Explain what it means for the Company to “consider” options to respect the Yakama Nation’s requirements for distribution system facilities supplying power off of tribal lands. Prove all supporting documentation and analysis for this claim.
- (b) PacifiCorp Witness Medina includes considerations for the Yakama Nation’s requirements related to distribution facilities in testimony, Exh. CMM-1T at 4:29–5:1, regarding equity in this filing. Please provide a summary of and documents pertaining to any equity analysis the Company has conducted related to the investment in the Flint 115-12.5 kV facilities. If such analysis has not been conducted, please explain why.

Response to PC Data Request 236

PacifiCorp objects to this request as vague and ambiguous as to the term “equity analysis.” PacifiCorp also objects to the extent that this data request infers an evidentiary standard mandating the creation, retention, and/or production of certain documentation and/or analysis. Without waiving the foregoing objections, PacifiCorp responds and follows:

- (a) Please refer to the Company’s response to WUTC Data Request 25 subpart (2), which describes how the Company evaluated an alternative Donald area substation solution to the selected Flint substation solution. As both the selected and alternative projects were consistent with principles of equity, the decision to proceed with Flint substation over the alternative was based on the capacity added for the initial investment cost, consistent with prudent utility practice.
- (b) The Company has not conducted analysis of the Flint beyond what it presented in the direct testimony of Company witness, Richard A. Vail.

PREPARER: Scott Beyer / Neil Jones

SPONSOR: Rick A. Vail