

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

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

Respondent.

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DOCKETS UE-230172

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

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**EXHIBIT CJD-3**

PacifiCorp Response to Public Counsel Data Request 233

September 14, 2023

### **PC Data Request 233**

**Re: Equity. Direct Testimony of Christina M. Medina, Exh. CMM-1T, at 6:22–7:22.** Has the Company conducted equity analysis of the proposed rate increases in Rate Year 1 (RY1) and Rate Year 2 (RY2), particularly as it relates to disparate impacts on Highly Impacted Communities and Vulnerable Populations? If yes, please provide a summary of the analysis and any supporting documentation. If no, please explain why such analysis has not been conducted.

### **Response to PC Data Request 233**

PacifiCorp objects to this request as vague and ambiguous as to the term “equity analysis.” PacifiCorp also objects to the extent that this data requests 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:

The Company has not conducted equity analysis of the proposed rate increases in Rate Year 1 (RY1) and Rate Year 2 (RY2), particularly as it relates to disparate impacts on Highly Impacted Communities and Vulnerable Populations, beyond what it presented in the direct testimony of Company witness, Robert M. Meredith.

PREPARER: Robert M. Meredith

SPONSOR: Robert M. Meredith