

**Exh. JDW-29**

**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  
CROSS-ANSWERING TESTIMONY OF**

**JOHN D. WILSON**

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

*AWEC Response to UTC Staff Data Request 2*

**December 27, 2023**

**STAFF DATA REQUEST NO. 2 TO AWEC:**

Please state whether witness Mullins has compared the coal price in Exh. BGM-7C (expressed in \$/ton) to the coal price in workpapers 230172-PAC-RJM-AGMFuelPrices (C), tab “yr\_x” (expressed in \$/mmBtu). (Note that the same data are also presented in workpaper 230172-PAC-RJM-Aurora2024NPCMasterBaseWA1 (C), tab “Coal Expense Calculation.”)

- a. If not, please explain how witness Mullins has verified that PacifiCorp’s coal expenses included in Exh. RJM-2 include the depreciation and reclamation costs discussed in Exh. BGM-1CT at 32-33.
- b. If so, please provide witness Mullins’ calculations and opinion regarding whether the cost in Exh. BGM-7C is the same as the cost in PacifiCorp’s workpapers.
- c. In either case, noting that Exh. BGM-7C provides coal prices on a monthly basis and the “Coal Expense Calculation” provides coal consumption on a monthly basis, please provide witness Mullins’ opinion as to whether coal expense should be calculated using monthly consumption and prices or using annual figures. Please provide any supporting calculations for this response.

**RESPONSE TO STAFF DATA REQUEST NO. 2:**

Yes. Coal costs in the referenced workpaper are designed to provide recovery of 100% of PacifiCorp’s 2/3rd’s share of the Bridger Coal Company (“BCC”) budget.

- a. Not applicable.
- b. Witness Mullins’ understanding is that the costs in Exh. BGM-7C are the same as the costs in PacifiCorp’s workpapers.
- c. Witness Mullins’ understanding is that the coal costs in the referenced workpaper are recalculated based on the final volumes in the NPC study to cover 100% of the BCC budget. Therefore, the impact would not be different if the amounts were calculated monthly versus annually. The monthly NPC used in the PCAM base might change, although this would be offset by the monthly removal of the depreciation and remediation expenses from actual NPC.

PAGE 4 – AWEC RESPONSE TO STAFF’S FIRST SET OF DATA REQUESTS

Date: October 3, 2023  
Respondent: Bradley G. Mullins  
Tietotie 2, Suite 208, FI-90460, Oulunsalo, Finland  
brmullins@mwanalytics.com