

UE-230482 / PacifiCorp
May 13, 2024
WUTC Data Request 39

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Regarding Mitchell, Exh. RJM-3T at 9, “Staff has not recognized that the entirety of the economic dispatch of Washington’s gas plants are conducted in the WEIM”.

- (a) Staff witness Wilson testifies regarding the generator bids for Chehalis and Hermiston. Wilson, Exh. JDW-1T at 51-52. Are the generator bids a result of actions taken by PacifiCorp’s staff, by the CAISO’s staff (entirely independently of PacifiCorp staff decision-making), or by staff of some other entity?
- (b) Please confirm that by the phrase “conducted in the WEIM,” Witness Mitchell is stating that generator bid, prevailing locational marginal price, gas nomination restrictions, and regulation instructions are determined exclusively by staff (or systems created and operated by staff) of the CAISO, which manages the WEIM.
- (c) Does witness Mitchell accept that Staff witness Wilson’s testimony does discuss the economic dispatch that occurs in the WEIM and those shows that he recognizes the role of the WEIM in dispatch of Chehalis and Hermiston? Wilson, Exh. JDW-1T at 52.

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- (a) This question implies a misunderstanding. Regarding Washington’s gas plants, the Western energy imbalance market (WEIM) is responsible for the non-reliability (economic) based physical dispatch (no other market directs physical dispatch) of the entirety of the plants’ operating range that is not associated with reliability products/operations. This responsibility is in the form of non-binding (i.e., the WEIM is a voluntary market) dispatch operating targets sent to the Company by the WEIM. In this manner and context, the entirety of the economic dispatch of Washington’s gas plants is conducted in the WEIM, based on WEIM locational marginal prices (LMP). Based on the foregoing clarification, the Company responds as follows.

The generator bids for all WEIM resources across the entirety of the WEIM footprint are either a result of actions taken by the relevant utility (PacifiCorp staff, as it relates to PacifiCorp’s generators) or as a result of the California Independent System Operator’s (CAISO) actions (CAISO staff) during periods of market power mitigation.

- (b) Partly confirmed, partly not confirmed, partly not relevant to the referenced phrase. Furthermore, the referenced phrase “conducted in the WEIM” is without context. As noted in the Company’s request to subpart (a) above, the

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wider context of the phrase is “the entirety of the economic dispatch of Washington’s gas plants are conducted in the WEIM”. Based on the foregoing clarification, the Company responds as follows.

The preamble to subpart (a) defines what is meant by “conducted in the WEIM”. Furthermore, as referenced in the Company’s response to subpart (a) above, “generator bids for all WEIM resources across the entirety of the WEIM footprint are either a result of actions taken by the relevant utility (PacifiCorp staff, as it relates to PacifiCorp’s generators) or as a result of the California Independent System Operator’s (CAISO) actions (CAISO staff) during periods of market power mitigation”. As it concerns LMP, those are calculated exclusively by systems operated by CAISO staff. As it concerns gas nomination restrictions, those are restrictions encountered by utilities (PacifiCorp staff, as it relates to the PacifiCorp’s generators) in the WEIM and reflected through model inputs into the WEIM. As it concerns regulation instructions, those are not considered “economic dispatch” in the context of this testimony and are therefore unrelated to the referenced phrase in its wider context.

- (c) Washington Utilities and Transportation Commission (WUTC) staff witness, John D. Wilson’s testimony references the WEIM and references the Company’s reference to the WEIM. WUTC staff witness Wilson’s testimony also references WEIM transactions and WEIM settlements but does not directly address the relationship between WEIM physical dispatch and the generation produced by Washington’s gas plants. Specifically, WUTC staff witness Wilson’s testimony does **not** show a recognition of the role of the WEIM in the dispatch of Chehalis or Hermiston based on WUTC staff witness Wilson’s usage of Mid-Columbia (Mid-C) day-ahead Intercontinental Exchange (ICE) settled prices to directly assess the economics of the physical dispatch of Washington’s gas plants.

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