

UE-230482 / PacifiCorp
May 13, 2024
WUTC Data Request 40

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Regarding Wilson, Exh. JDW-14C (entire response) and Mitchell, Exh. RJM-3T at 10, “Staff ... conveniently ignores the fact that non-Washington plants are ramped down to hold capacity which supports the integration of Washington’s allocated portion of the system’s wind and solar plants”.

- (a) Please admit that PacifiCorp did not provide a specific response to UTC Data Request 30(e), which requested an explanation of “how PacifiCorp was able to ensure system reliability or provide ancillary services during the hours in which both [Chehalis and Hermiston] units were offline”.
- (b) Please provide a complete response to UTC Data Request 30(e) and other parts of UTC Data Request 30 such as parts (b) and (d) that are relevant to the rebuttal testimonies filed by PacifiCorp.
- (c) Please identify where, in UTC Data Request 30 or any other aspect of Staff witness Wilson’s testimony, a standard of “perfect hindsight” was applied. In your response, please specifically identify data used in testimony or analysis that are not reasonably representative of data that would have been readily available to PacifiCorp at the time of unit dispatch.

Response to WUTC Data Request 40

- (a) WUTC Data Request 30 is unrelated to the “fact that non-Washington plants are ramped down to hold capacity which supports the integration of Washington’s allocated portion of the system’s wind and solar plants”. The ramping down of non-Washington plants to hold capacity (regulation reserves) required to integrate (regulate) Washington’s wind and solar resources for Washington customers occurs in the PacifiCorp East (PACE) balancing area (BA). Chehalis and Hermiston are in the PacifiCorp West (PACW) BA; those plants are therefore unrelated to the statement made in the rebuttal testimony of Company witness, Ramon J. Mitchell, Exhibit RJM-3CT at 10.

All plants in PACW that hold regulation reserves are Washington plants and those plants integrate **PACW** wind and solar.¹ The issue is in PACE where gas and coal plants that are **not** allocated to (paid for by) Washington, hold regulation reserves, and incur costs, to integrate **PACE** wind and solar energy, which is then allocated to Washington. Under the Washington Inter-Jurisdictional Cost Allocation Methodology (WIJAM), Washington is allocated costs and benefits associated with their share of wind and solar

¹ The North American Electric Reliability Corporation standard BAL-001-2 requires balancing authorities to manage and maintain interconnection frequency in each balancing area within defined limits. In calendar year 2022, PACW did not provide PACE with frequency response or regulation reserves.

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resources in PACE but are **not** allocated costs or benefits associated with the capacity on those non-Washington gas and coal plants that allow those aforementioned wind and solar resources to be integrated into the system and thereby serve Washington customers.

- (b) Please refer to the Company's response to subpart (a) above.
- (c) The Company is unaware of Washington Utilities and Transportation Commission (WUTC) staff witness, John D. Wilson, employing a standard of perfect hindsight in response testimony and the Company has no reference in testimony to WUTC staff witness Wilson employing a standard of perfect hindsight. However, there is reference by the Company of WUTC staff witness Wilson's "perfect hindsight review", which simply meant that WUTC staff witness Wilson's analysis was conducted in 2024, and has the benefit of perfect hindsight.

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