



STATE OF WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

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January 19, 2022

**NOTICE OF BENCH REQUESTS**  
**(Due by Wednesday, January 26, 2022, at 5 p.m.)**

RE: *Washington Utilities and Transportation Commission v. PacifiCorp d/b/a Pacific Power and Light Company*, Docket UE-210402

TO PACIFICORP d/b/a PACIFIC POWER AND LIGHT COMPANY, COMMISSION STAFF, THE ENERGY PROJECT, AND WALMART:

**BENCH REQUEST NO. 2:**

On November 5, 2021, PacifiCorp d/b/a Pacific Power and Light Company (PacifiCorp or Company), Commission staff, The Energy Project, and Walmart (collectively, Settling Parties) filed a Settlement Stipulation (Settlement). The Settlement provides for an update to net power costs (NPC) at the compliance stage following the Commission's final order. Settlement ¶ 8. According to the Joint Testimony, this update will include wholesale electric sale and purchase contracts that are for long-term firm sales and purchases; short-term firm sales and purchases; and natural gas sales and purchase contracts. Joint Testimony, Exh. JTR-1CTr at 10:16-11:5.

1. Please identify any prior final orders where the Commission has allowed a utility to include new long term purchase power agreements (PPAs) in a compliance stage update. Please indicate if these agreements were identified in the record prior to the close of discovery in that proceeding.
2. Please identify any long-term PPAs that the Settling Parties reasonably anticipate will be included in the compliance stage NPC update in this proceeding. Please indicate if these agreements were identified in the record prior to the hearing in this proceeding.

**BENCH REQUEST NO. 3**

In their Joint Testimony, the Settling Parties indicate that “more than 20 percent of Washington load has to be satisfied using modeled market interactions.” Joint Testimony, Exh. JTR-1CTr at 12:8-9.

Over each of the last five calendar years, what was the specific amount of Washington load that PacifiCorp was required to meet with market purchases? Please provide a specific megawatt hour allocation, as well as a percentage figure of PacifiCorp's Washington load, required to be met with market purchases for each of the last five calendar years. To the extent that this answer relies on different inter-jurisdictional allocation methods, please note the allocation method relied upon for the information for each calendar year.

**BENCH REQUEST NO. 4**

In rebuttal testimony, Mr. Wilding states that Washington's portfolio has "more than 20 percent" of its load exposed to short-term market purchases. Exh. MGW-6Tr at 6:9-10.

In their Joint Testimony, the Settling Parties state, "Additionally, the Washington allocation of PacifiCorp's resource mix includes less dispatchable resources compared to other states, so it leaves Washington NPC uniquely vulnerable to increases in market prices. In addition, a significant portion of the dispatchable generation that composes the resource base in Washington is gas-fired, which also increased in cost due to the increases in gas prices over the last six months." Exh. JTR-1CTr at 11:24-12:4.

Considering that Washington's resource portfolio is "uniquely vulnerable," has the Company performed a risk assessment of the Washington resource portfolio's market exposure to determine it was the lowest reasonable cost portfolio considering risk? Please indicate if PacifiCorp did so in the context of its long-term resource acquisition decisions.

Please respond to these Bench Requests no later than Wednesday, January 26, 2022, by 5 p.m., by electronic filing with the Commission's Records Center. Please provide courtesy email copies to all parties and the presiding administrative law judge. If you have any questions concerning these requests, please contact Administrative Law Judge Michael Howard at 360-664-1139 or via email at [michael.howard@utc.wa.gov](mailto:michael.howard@utc.wa.gov).

*/s/ Michael Howard*  
MICHAEL HOWARD  
Administrative Law Judge

cc: All Parties