

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER & LIGHT CO.,

Respondent.

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DOCKET UE-230482

**CROSS-EXAMINATION OF RAMON J. MITCHELL  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT RJM-\_\_X**

PacifiCorp Response to Public Counsel Data Request No. 10

**May 28, 2024**

UE-230482 / PacifiCorp  
February 26, 2024  
PC Data Request 10

## **PC Data Request 10**

### **Washington Market Exposure**

- (a) Please provide in Excel format for each month for the years 2013 through 2023, inclusive, the monthly MWh net short (long) position for Washington customers for each month going forward two years.
- (b) Please provide in Excel format for each month for the years 2013 through 2023, inclusive, the quarterly MWh net short (long) position for Washington customers for each month going forward six quarters.
- (c) Please provide in Excel format for each month for the years 2013 through 2023, inclusive, the monthly natural gas MMBtu net short (long) position for Washington customers for each month going forward three years.
- (d) Please provide in Excel format for each month for the years 2013 through 2023, inclusive, the rolling years 1 to 3 natural gas MMBtu net short (long) position for Washington customers.

## **Response to PC Data Request 10**

The Company objects to this request as overly broad, unduly burdensome, beyond the scope of this proceeding. The Company further objects to this request which seeks information related to periods that are outside the scope of this calendar year 2022 power cost adjustment mechanism (PCAM) proceeding. Data and information prior to calendar year 2022 and after calendar year 2022 are not reasonably calculated to lead to the discovery of admissible evidence in this proceeding. Without waiving the foregoing objections, the Company responds as follows:

Please refer to direct testimony of Company witness, Ramon J. Mitchell, specifically Exhibit RJM-1T, page 5, lines 9 through 13, and to the Company's response to Public Counsel Data Request 1 subpart (k). The Company does not hedge for Washington or any other state separately and does not produce or possess state-specific position reports.

PREPARER: Doug Staples

SPONSOR: Ramon J. Mitchell