

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

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

Respondent.

DOCKET UE-230482

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

EXHIBIT RJM-__X

PacifiCorp Response to Public Counsel Data Request No. 13

May 28, 2024

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PC Data Request 13

PC Data Request 13

PacifiCorp Response to Public Counsel Data Request 1(e):

- (a) Public Counsel asked for numerical evidence for the Company's answer. PacifiCorp provided none. Please answer yes or no. Does the Company have numerical evidence or records of the policy it outlines in its response?
- (b) If the answer to subpart (a) is yes, please provide details for the years 2013 through 2023, inclusive, of each transaction for natural gas put on for each of the three rolling month periods and which period the transaction applied to.
- (c) If the answer to subpart (a) is yes, please provide details for the years 2013 through 2023, inclusive, of each transaction for electric power put on for each of the six quarters rolling month periods and which period the transaction applied to.
- (d) Please provide justification for PacifiCorp's Energy Risk Management Policy cited in the response including documentation for the justification along with any data and calculations used in Excel format.

Response to PC Data Request 13

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:

Referencing the Company's response to Public Counsel Data Request 1 subpart (e), the Company responds as follows:

- (a) Yes. The numerical evidence provided with the Company's response to Public Counsel Data Request 1 subpart (e) was a demonstration that, not only does the Company manage outside of the 12-month forward-looking period, but such management has quantitatively defined minimum requirements (and, in the case of natural gas, maximum allowable limits) pursuant to PacifiCorp's Energy Risk Management Policy.
- (b) Please refer to the Company's response to Public Counsel Data Request 1, specifically Confidential Attachment PC 1-2, which already provides the transaction level data for 2013 through 2022. The period to which each

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transaction applies changes over time and cannot be identified as a singular value.

- (c) Please refer to the Company's response to Public Counsel Data Request 12, specifically Confidential Attachment PC 12, which provides data for calendar years 2019 through 2023. Specifically filter "Account Number" (column B) field for values 301406 (Sales) and 505224 (Purchases). The period to which each transaction applies changes over time and cannot be identified as a singular value. Note: similar bookout data prior to 2019 is not readily available.
- (d) Please refer to the Company's response to AWEC Data Request 002, specifically Confidential Attachment AWEC 002, which provides copies of PacifiCorp's Energy Risk Management Policy. In addition, please refer to the Company's response to AWEC Data Request 006, specifically Confidential Attachment AWEC 006, which provides copies of the Company's hedging presentations to the Washington Utilities and Transportation Commission (WUTC) during 2018 through 2022. The policy update was the result of months of collaborative meetings between PacifiCorp's energy supply management (ESM) front office and middle office departments to assess the state of the energy market in the West, and to determine the most appropriate limit structure with consideration given to emerging risk factors related to price risk, deliverability risk, and supply risk. As such, there are no spreadsheet records to provide.

Confidential information is provided subject to a confidentiality agreement executed between PacifiCorp and Public Counsel.

PREPARER: Doug Staples / Ray Zacharia

SPONSOR: Ramon J. Mitchell / John Fritz / Doug Young