

**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. 14

**May 28, 2024**

UE-230482 / PacifiCorp  
February 26, 2024  
PC Data Request 14

## PC Data Request 14

### PacifiCorp Response to Public Counsel Data Request 1(g):

- (a) Please answer yes or no. Is it correct to understand from PacifiCorp's response that the Company does not hedge "for Washington in line with its active risk management over time".
- (b) If the answer to subpart (a) is no, please answer yes or no to the following question. Is it correct to understand from PacifiCorp's response that it has no evidence from actual Company trading activity that the Company hedges "for Washington in line with its active risk management over time".
- (c) If the answer to subpart (b) is no, please provide evidence from actual Company trading activity that the Company hedges "for Washington in line with its active risk management over time."

### Response to PC Data Request 14

- (a) No. The Company's response to Public Counsel Data Request 1 (g) states that "the Company does not separately hedge for Washington" (*emphasis added*). Please refer to the Company's response to Public Counsel Data Request 1, subpart (h)4. and to the direct testimony of Company witness, Ramon J. Mitchell, Exhibit RJM-1T, page 5, lines 3 through 8. PacifiCorp's current Energy Risk Management Policy specifies limits for hedging the system overall, meaning it hedges for Washington as a part of that system.
- (b) No.
- (c) Please refer to the Company's response to Public Counsel Data Request 1, subpart (d), where the Company has already demonstrated that it ratably hedges its system over time. Please refer to the Company's response to Public Counsel Data Request 1, subpart (d), which provides gas swap information for 2013 through 2022.

PREPARER: Doug Staples

SPONSOR: Ramon J. Mitchell / John Fritz