

**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 WESLEY YEOMANS
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT WY-__XC

UTC Staff Response to Public Counsel Data Request No. 4C

May 28, 2024

**Shaded Information is Designated as Confidential per Protective Order in
Docket UE-230482**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSES TO DATA REQUESTS

DATE PREPARED: April 15, 2024	WITNESS: Wesley Yeomans
DOCKET: UE-230482	RESPONDER: Wesley Yeomans
REQUESTER: Public Counsel	TELEPHONE:

DATA REQUEST NO. 4:

Re: Direct Testimony of Wesley Yeomans, Exh. WY-1CT at 11:4-10

- a. Please provide a list of the “actual examples” found in support of the conclusion that PacifiCorp is executing the requirements defined in its formal Energy Risk Management Policy and Energy Supply Management Front Office Procedures.
- b. What is meant by “found actual examples”? How were they found?
- c. Were any examples found that were not “actual?” If so, please provide a list of examples that were not “actual.”
- d. Does “found actual examples” mean that only some of the records provided by PacifiCorp were examined?
- e. Does “found actual examples” mean that PacifiCorp did not provide complete records so that it was not possible to determine whether or not PacifiCorp always in 2022 executed the requirements defined in its formal Energy Risk Management Policy and Energy Supply Management Front Office Procedures?
- f. Please answer yes or no. Does Staff conclude that in 2022 PacifiCorp always executed the requirements defined in its formal Energy Risk Management Policy and Energy Supply Management Front Office Procedures?
- g. Please answer yes or no. If the answer to subpart f is yes, is that based on the “actual examples” found?
- h. If the answer to subpart g. is yes, please explain how “actual examples” can lead to the conclusion that in 2022 PacifiCorp always executed the requirements defined in its formal Energy Risk Management Policy and Energy Supply Management Front Office Procedures.
- i. If the answer to subpart g. is no, please explain the basis for concluding that in 2022 PacifiCorp always executed the requirements defined in its formal Energy Risk Management Policy and Energy Supply Management Front Office Procedure.

RESPONSE:

- a. The actual examples that I reviewed to support my conclusion that PacifiCorp is executing the requirements in its risk policies and procedures were found in four different, daily Physical Power Position Report spreadsheets. I reviewed the daily processes and information within the nine different spreadsheet tabs in these daily spreadsheet reports. I list the five most relevant spreadsheet tabs below noting important data imports processes, risk executions, and reporting contained within the spreadsheet tabs. I reviewed and noted that validated hedge quantities were in most cases different by day indicating that hedging actions were executed daily. I also

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e. I did not request the 250 business days of daily physical power position spreadsheets from PacifiCorp. I did not review 250 business day daily physical power position reports. I did review the physical power position spreadsheets that were provided by PacifiCorp in response to other parties discovery requests. Based on my review of the daily production processes reported in the daily Physical Power Position Reports for the days that I did review, I conclude the requirements defined in the formal Energy Risk Management Policy and Energy Supply Management Front Office Procedures were followed and executed on these days. Additionally I did observe in the [REDACTED]

Based on these observations it seems the procedures were followed and executed on business days between January 1, 2022 and March 31, 2022.

e. As I say in subpart e I did not review all 250 business-day spreadsheets.

f. Answer to subpart f is no.

g. Answer to subpart f is no.

h. I did not review 250 physical power position report spreadsheets. I cannot say with full certainty that PacifiCorp is always executing the requirements of their risk policies and procedures. However as I stated in subpart e, I did observe in the [REDACTED]

[REDACTED] Based on these observations it seems the procedures were followed and executed on business days.