

UE-240461

Received  
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Sep 23, 2024



**Bob Ferguson**  
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September 23, 2024

**SENT VIA WEB PORTAL**

Jeff Killip  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: ***In the Matter of the Petition of PacifiCorp 2023, Power Cost Adjustment Mechanism, Docket 240461***

Public Counsel of the Washington State Attorney General's Office (Public Counsel) respectfully submits these comments in response to the Petition for Approval filed by PacifiCorp on June 14, 2024, regarding the 2023 Power Cost Adjustment Mechanism (PCAM). PacifiCorp filed the 2023 petition with the same hedging and pricing practices that are currently being litigated in Docket UE-230482 related to PacifiCorp's 2022 PCAM filing. That matter went to hearing on June 4, 2024, and the post-hearing briefing was completed on July 12, 2024. The statutory suspension date for that matter is November 1, 2024, and the Commission has not yet issued its order resolving the contested matters.

PacifiCorp's petition for the 2023 PCAM should be suspended and set for adjudication for the same reasons as stated in Docket UE-230482, Order 01—to resolve whether PacifiCorp's system-wide hedging is prudent and whether WIJAM's balancing adjustment is appropriately priced. When the Washington Utilities and Transportation Commission (Commission) issues its order in that Docket, Public Counsel presumes that one or more parties may file a motion for a summary determination applying the Commission's resolution of those issues to the current filing. As it stands now, however, the same factual and legal questions from the 2022 PCAM proceeding prevent the Commission from approving the 2023 PCAM.



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If you have any questions regarding these comments, please do not hesitate and contact me.

Sincerely,

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Enclosures

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