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-__XCr

UTC Staff Response to Public Counsel Data Request No. 5C

~~**May 28, 2024**~~

Revised May 29, 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. 5:
Re: Direct Testimony of Wesley Yeomans, Exh. WY-1CT at 11:12–12:12

a.   Please provide a list of the "actual examples" found in the review of PacifiCorp's practices for maintaining updated input data.

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 in 2022 PacifiCorp was always prudent in maintaining updated input data?

f.   Please answer yes or no. Does Staff conclude that in 2022 PacifiCorp always prudently maintained updated input data?

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 prudently maintained updated input data.

i.   If the answer to subpart g. is no, please explain the basis for concluding that in 2022 PacifiCorp always prudently maintained updated input data?

RESPONSE:

a.   The actual examples that I reviewed to support my conclusion that PacifiCorp is maintaining updated input data were found in four different, daily Position Calculator spreadsheets. I reviewed the spreadsheets to ensure practices for maintaining updated input data were executed. The "Control Tab" is the specific tab that requires daily execution of data import macros.

b.   By "found actual examples" I meant the four different, daily Position Calculator spreadsheets.

c.   No examples were found that were not "actual".

d.   I did not review records for every business day.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
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DATE PREPARED: April 15, 2024 DOCKET: UE-230482 REQUESTER: Public Counsel	WITNESS: Wesley Yeomans RESPONDER: Wesley Yeomans TELEPHONE:

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 physcial 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 PacifiCorp did updated input data on these days. Additionally, ███████████████████████████████████ ██ ██████████████████████████████ This step is amongst all the other daily production steps. Based on this observation it seems the processes for updating data are executed on business days.

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

g. Answer to subpart f is no.

h. Answer to subpart f is no.

i. I did not review 250 physical power position report spreadsheets. I cannot say with full certainty that PacifiCorp is always maintaining updated input data. However as I stated in subpart e, █████████████████████████████████ ██ ████████████████████████████████ This step is amongst all the other daily production steps. Based on this observation it seems the processes for updating data are executed on business days".