

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

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**EXHIBIT WY-\_\_XCr**

UTC Staff Response to Public Counsel Data Request No. 6C

~~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. 6:**

**Re: Direct Testimony of Wesley Yeomans, Exh. WY-1CT at 12:14–13:17**

- a. Please provide a list of the “actual examples” found in the review of PacifiCorp’s risk model and risk reporting.
- 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 was always in 2022 prudent in its risk model and risk reporting?
- f. Please answer yes or no. Does Staff conclude that in 2022 PacifiCorp was always been prudent in its risk model and risk reporting 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 was always prudent in its risk model and risk reporting.
- i. If the answer to subpart g. is no, please explain the basis for concluding that in 2022 PacifiCorp was always prudent in its risk model and risk reporting.

**RESPONSE:**

- a. The actual examples that I reviewed to support my conclusion that PacifiCorp is executing risk modeling and risk reporting were found in four different, daily Physical Power Position Report spreadsheet. I reviewed spreadsheet processes to ensure risk modeling and risk reporting were processed daily. [REDACTED]
- b. By found examples I meant it was evident by the changes in daily Physical Power Position Reports that the formal procedures were being executed daily.

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- c. No examples were found that were not “actual”.
- d. Yes. I did not review records for every business day.
- 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 PacifiCorp is did execute the risk model and risk reporting. Additionally I did observe in the March 31, 2022 Position Calculator spreadsheet [REDACTED] Based on this observation it seems the processes for the risk models and risk reports are executed daily.
- 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, I did observe in the March 31, 2022 Position Calculator spreadsheet [REDACTED] Based on this observation it seems the processes for the risk models and risk reports are executed daily.