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- Xr

UTC Staff Response to Public Counsel Data Request No. 8

May 28, 2024

Revised May 29, 2024

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF RESPONSES TO DATA REQUESTS

DATE PREPARED: April 15, 2024

DOCKET: UE-230482

REQUESTER: Public Counsel

WITNESS: Wesley Yeomans

RESPONDER: Wesley Yeomans

TELEPHONE:

DATA REQUEST NO. 8:

Re: : Direct Testimony of Wesley Yeomans, Exh. WY-1CT at 14:1–5.

In support of the conclusion that PacifiCorp's hedging program was prudent in operation:

- a. Please answer yes or no. Is it asserted that all of PacifiCorp's gas and power positions in 2022 were prudent during 2022 and leading up to 2022 were prudent?
- b. If the answer to subpart a. is yes, please provide documentation for your answer.
- c. Please answer yes or no. If the answer to subpart a. is no, is this because not all of PacifiCorp's gas and power positions in 2022 were prudent during 2022 and leading up to 2022 were prudent?
- d. If the answer to subpart c. is no, please explain the finding that PacifiCorp's hedging program was prudent in operation.
- e. If the answer to subpart c. is yes, please explain how your answer is consistent with the finding that PacifiCorp's hedging program was prudent in operation.

RESPONSE:

- a. I did not review all the gas and power hedges and trades over the 250 business days in 2022 nor all the gas and power hedges and trades in the all the days leading up to 2022. However for the days and transactions that I did review, it certainly appears all of those transactions were executed per the procedures with the prudent intent to mitigate identified risk limit violations.
- b. Response to subpart a is no.
- c. No. The reason do not assert that all of PacifiCorp's gas and power trades were prudent is because I did not review all of the transactions executed in 2022 and all the days leading up to 2022.
- d. See response to PC to WUTC Staff DR-7 (d)
- e. See response to subpart c is no.