

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY

Respondent.

DOCKET UE-210829

**DR. ROBERT L. EARLE
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT RLE-3

PacifiCorp Response to Public Counsel Data Request No(s). 1 through 3

August 21, 2024

August 12, 2024

Robert Sykes
Assistant Attorney General
Public Counsel Unit
Robert.Sykes@atg.wa.gov

PCCSeaEF@atg.wa.gov

Stefan de Villiers
Stefan.deVilliers@atg.wa.gov

Tad O'Neill Robinson
Tad.ONeill@atg.wa.gov

RE: **WA UE-210829**
PC Data Request (1-3)

Please find enclosed PacifiCorp's Responses to PC Data Requests 1-3.

If you have any questions, please call me at 503-813-5410.

Sincerely,

_____/s/_____
Ariel Son
Regulatory Affairs Manager

C.c.: Sommer Moser/AWEC sjm@dvclaw.com
Corinne O. Olson/AWEC coo@dvclaw.com
Nannette M. Moller/AWEC nmm@dvclaw.com
Tyler Pepple/AWEC tcp@dvclaw.com
Josephine R. K. Strauss/WUTC Josephine.Strauss@atg.wa.gov
Jeanne Roth/WUTC Jeanne.Roth@atg.wa.gov
Betsy DeMarco/WUTC Elizabeth.Demarco@atg.wa.gov

PC Data Request 1

Re: 2024 Clean Energy Implementation Plan Progress Report. As noted in workbook “210829-PAC-RG-WP-6-17-24.xlsx” (tab “2023 Biennial CEIP”) the Company’s 2023 Biennial CEIP Update proposes a revised 2023 clean energy interim target of 26 percent, based on projections of 4,128,704 MWh in Washington retail sales and 1,081,277 MWh in CETA-compliant energy. In the Company’s 2024 CEIP Progress Report (Page 3, Table 1), the Company records actual 2023 retail sales (net of qualifying facilities) of 3,844,824 MWh and CETA-compliant energy of 1,184,120 MWh, equal to 30.8 percent of retail sales. Please answer the following:

- (a) When were the 2023 Biennial CEIP Update retail sales and CETA-compliant energy projections calculated? How much actual 2023 data on retail sales and CETA-compliant energy had been collected when those projections were calculated?
- (b) Please explain the factors that contributed to a decrease in retail sales from the 2023 Biennial CEIP Update projections to the 2024 CEIP Progress Report results.
- (c) Please explain the factors that led to an increase in CETA-compliant energy from the 2023 Biennial CEIP Update projections to the 2024 CEIP Progress Report results.

Response to PC Data Request 1

- (a) The retail sales forecast used in PacifiCorp’s 2023 Integrated Resource Plan (IRP) and which inform the 2023 Biennial Clean Energy Implementation Plan (CEIP) Update, was created in May 2022. Actual retail sales data for 2023 were not available at the time that the forecast was created.
- (b) The Company’s actual 2023 retail sales were lower than projected primarily due to a long shut down for a large customer in 2023.
- (c) PacifiCorp’s 2023 IRP was a forecast of Clean Energy Transformation Act (CETA) compliant energy based on modeled dispatch results. The modeled dispatch outcomes did not, and could not, consider a few months of 2023 actuals. No model is going to perfectly predict the future and hence, some discrepancy between modeled CETA-compliant energy and actuals is expected.

In PacifiCorp’s 2024 Annual Progress Report, please refer to Table 1 which includes a summary of 2023 actuals for Washington retail sales and CETA-compliant, renewable energy credit (REC) generating energy. In the fourth row from the bottom of the table, highlighted in bold type, is all RECs that are already cost-allocated to Washington customers. This row is most consistent with the forecasted RECs as depicted in PacifiCorp’s 2023 Biennial CEIP Update forecast. This row shows that

the actuals were in fact, over 130,000 megawatt-hours (MWh) lower than the 2023 Biennial CEIP Update. Again, this is expected, because the forecasts of renewable resources as modeled in the IRP, assume generation of hydroelectric or wind power follow an expected trajectory throughout the year. However, in reality, bad weather years can drive lower energy and REC generation, as shown by the 2023 actuals. Based on these RECs, PacifiCorp would have only met a target of 24.6 percent. To make up this shortfall, PacifiCorp included in the accounting, RECs that the Company currently has that are not allocated to other customers nor have they been sold on the market. These additional RECs are shown in the third and second from-the-bottom rows. "PacifiCorp system RECs" include those purchased as bundled energy and RECs under the same transaction on PacifiCorp's system, but where Washington is not allocated the energy as part of its cost allocation under the Company's Washington Inter-Jurisdictional Allocation Methodology (WIJAM). A cost recovery mechanism for these RECs will need to be established if these RECs are retired at the end of the 2022-2026 compliance period.

PREPARER: Rohini Ghosh / Lee Elder

SPONSOR: Rohini Ghosh

PC Data Request 2

Re: Direct Testimony of Rohini Ghosh, Exh. RG-1T at 18:4–6. Company witness Ghosh states that “a one MW increase in the forecasted retail sales would require a one MW increase in the forecasted CETA-compliant for [sic] energy for the interim target to remain unchanged”. Please confirm that this is an incorrect statement; for the interim target to remain unchanged, a one MW increase in the forecasted retail sales would require an increase in the forecasted CETA-compliant energy of a fraction of one MW equal to the interim target percentage.

Response to PC Data Request 2

PacifiCorp acknowledges that the statement “a one MW increase in the forecasted retail sales would require a one MW increase in the forecasted CETA-compliant for [sic] energy for the interim target to remain unchanged” is an over-simplification and is a mathematically incorrect statement. However, at the magnitude of megawatt-hours (MWh) being discussed with regards to the Clean Energy Transformation Act (CETA) interim targets, the statement remains true within the range of a rounding error.

PREPARER: Rohini Ghosh

SPONSOR: Rohini Ghosh

PC Data Request 3

Re: Direct Testimony of Matthew D. McVee, Exh. MDM-1T at 16:15–17:4.

Company witness McVee states that the Framework Issues Workgroup (FIWG) has met “approximately six times per year for several years.” Please answer the following:

- (a) Please provide a list of all participants in the FIWG.
- (b) Please provide the dates of all FIWG meetings held since the signing of the 2020 Protocol through today.
- (c) Please provide the minutes of all FIWG meetings held since the signing of the 2020 Protocol through today.
- (d) Please provide any internal Company memos relating to FIWG meetings held since the signing of the 2020 Protocol through today.
- (e) Are FIWG discussions on a Post-Interim Period Methodology ongoing? If so, please provide the date of the next FIWG meeting.

Response to PC Data Request 3

- (a) Please refer to the signatories to the 2020 Multi-State Inter-Jurisdictional Cost Allocation Methodology (2020 Protocol) approved by the Washington Utilities and Transportation Commission (WUTC) in docket UE-191024.
- (b) Please refer to the list provided below of Framework Issues Workgroup (FIWG) held from calendar 2020 through current (July 2024):

March 25-26, 2020, June 10, 2020, September 9, 2020, December 16-17, 2020, April 13, 2021, April 29, 2021, July 14-15, 2021, August 24-25, 2021, September 29-30, 2021, November 8-9, 2021, December 16, 2021, January 26-27, 2022, March 10-11, 2022, May 4, 2022, June 27-28, 2022, August 24-25, 2022, September 28-29, 2022, November 3-4, 2022, January 17-18, 2023, March 15, 2023, May 9-10, 2023, July 26-27, 2023, September 27-28, 2023, December 4-5, 2023, January 11-12, 2024, March 5-6, 2024, and July 9, 2024.
- (c) The Company objects to this request as it seeks confidential settlement discussions that are privileged communications under Washington law.
- (d) The Company objects to this request as it seeks confidential settlement discussions that are privileged communications under Washington law.

(e) No. PacifiCorp informed the FIWG that it did believe a negotiated agreement on a post-interim period methodology was likely in time to seek approvals.

PREPARER: Matt McVee

SPONSOR: Matt McVee