

**Exh. JNS-21  
Docket UE-210829  
Witness: Jaclynn N. Simmons**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PACIFICORP d/b/a PACIFIC POWER  
& LIGHT COMPANY,**

**Respondent.**

**DOCKET UE-210829**

**EXHIBIT TO TESTIMONY OF**

**JACLYNN N. SIMMONS**

**ON BEHALF OF STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PacifiCorp Response to UTC Staff Data Request No. 46*

**August 21, 2024**

## **WUTC Data Request 46**

In the direct testimony of Rohini Ghosh in RG-1T at page 20 line 22 through page 21 line 4 “PacifiCorp also plans to propose specific procurement actions in the 2025 IRP and CEIP to further address its need for additional resources. Washington will receive a share of all new resources, and all new renewable and non-emitting resources will increase the share of Washington retail electricity that is served by CETA-compliant energy (or otherwise displace emitting resources through storage capacity)”

- (a) What kinds of specific procurement actions does PacifiCorp intend to propose in the 2025 IRP and CEIP process?
- (b) Does PacifiCorp intend to open another All-Source RFP based on the results of the IRP process?
- (c) If PacifiCorp does open another procurement, how does it intend to avoid the same problems that led to the cancellation of the 2022 All-Source RFP?
- (d) If PacifiCorp intends to open another RFP, what does it think the advantages are to the proposed RFP over the 2022 All-Source RFP?
- (e) How can PacifiCorp guarantee that it will not cancel that procurement?
- (f) Does PacifiCorp intend to use any of the cost deferral or return on equity options granted to it in RCW 80.28.410?
  1. Did the Company intend to use this mechanism in either the 2020 or 2022 AS RFPs?

## **Response to WUTC Data Request 46**

- (a) Proposed procurement actions are the output of PacifiCorp’s 2025 Integrated Resource Plan (IRP). It would be premature to speculate on what specific system procurement actions will be recommended from the 2025 IRP. It is generally anticipated that the 2025 IRP output will recommend limited procurement necessary for specific state statutory compliance.
- (b) A request for proposals (RFP) is generally anticipated to be necessary for procuring resources for specific state statutory compliance.
- (c) PacifiCorp was not responsible for the policy changes that resulted in the prudent cancellation of the 2022 All Source Request for Proposals (2022AS RFP). The 2025 IRP will provide specific state policy-compliant portfolio targets that should

- minimize the impact of policy changes on state-specific procurement.
- (d) The 2022AS RFP was predicated on system resource procurement targets. Future procurement will have an as-yet-to-be-determined mechanism to procure for specific state policy requirements.
  - (e) Although PacifiCorp does not anticipate canceling future RFPs, the Company cannot guarantee that it will not cancel any procurement efforts when foundational assumptions, policies, or laws change that impact the economics of any procurement decision.
  - (f) The decision to utilize either of the cost deferral or return on equity (ROE) options granted in the Revised Code of Washington (RCW) 80.28.410 will be contingent upon a comprehensive evaluation of several critical factors. These include, but are not limited to, the likelihood of cost recovery, the synchronization of incurred costs with the schedule of general rate cases (GRC), and the necessity for additional data that is typically procured from executed contracts concerning new resources. As of the present moment, PacifiCorp has not committed to any definitive agreements pertaining to resources projected in the 2025 Integrated Resource Plan (IRP). Consequently, the decision to exercise the aforementioned options remain pending. The Company anticipates that a resolution will be reached once formal agreements are signed and additional information is made available, enabling a more informed and judicious determination. The Company did not intend to use these mechanisms for the 2020 or 2022AS RFPs, as those were system RFPs, and not CETA-specific procurement activities.

PREPARER: Tom Burns / Doug Young

SPONSOR: Tom Burns / Doug Young