

**Exh. JNS-9  
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**

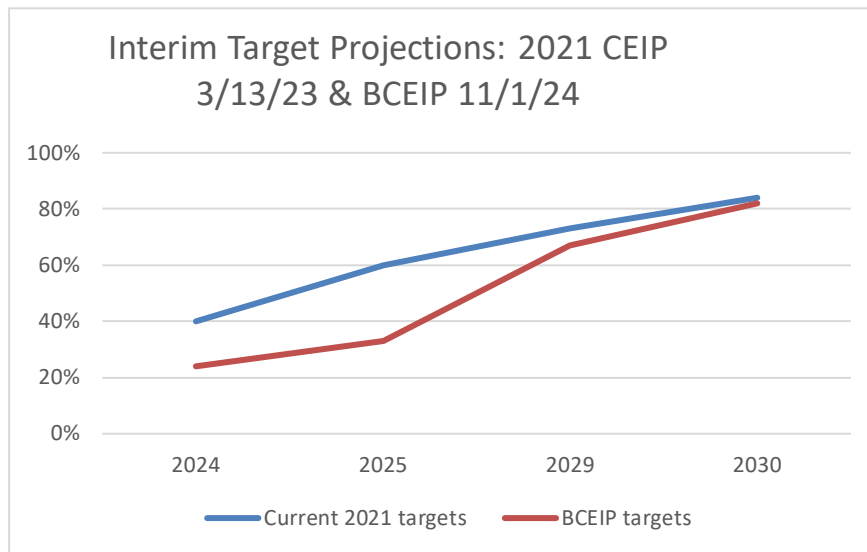
*PacifiCorp Response to UTC Staff Data Request No. 23*

**August 21, 2024**

## WUTC Data Request 23

### Interim Targets:

- (a) Since this Biennial update is being litigated, the interim targets in the 2021 CEIP approved by the Commission on 10/25/23 are the targets PacifiCorp is obligated to obtain. Please explain how PacifiCorp is planning to meet those targets.
- (b) In the graph below please circle where PacifiCorp anticipates that it will be by end of 2029 and into 2030 and put a star of where the Company is currently at in 2024.



- (c) How are the projections for 2030 at 82%, if the Company is not fulfilling the shortfall in resources?
- (d) What assurance can PacifiCorp give to the Commission that it will hit that targeted projection in 2030, if PacifiCorp is not currently acquiring resources that were identified in the IRP for the 2022 ASRFP?

## Response to WUTC Data Request 23

- (a) PacifiCorp objects to this request to the extent it seeks legal analysis, opinions, and/or conclusions. PacifiCorp further objects to this data request to the extent that it is based on an incorrect conclusion regarding the Commission's order and the stipulation of the parties that called for interim revised targets in the biennial update. Subject to and without waiving the foregoing objections, the Company responds as follows: In General Order R-601 in Docket No. UE-191023, the Washington Utilities

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

- and Transportation Commission (WUTC) noted the Clean Energy Transformation Act (CETA) uses a four-year average of the implementation period to meet a percent of retail sales target. Further, the WUTC stated any renewable energy credits (REC) generated between 2022 and 2025 can be used for compliance in any of those years. Accordingly, final compliance for the current four-year Clean Energy Implementation Plan (CEIP) period, 2022 through 2025, appears to be assessed at the end of the period. Regarding the most recent interim target year, please refer to the Company's 2023 CEIP Progress Report, which will be filed with the WUTC by July 1, 2024. In the event the WUTC denies the Company's request for lowered interim targets in this proceeding, the Company will develop a compliance strategy to meet the regulatory mandate included in the WUTC order, which may be more expensive than properly planning to meet the 2030 compliance requirements and, consequently, unnecessarily increase costs for customers.
- (b) Please refer to the forecasts for 2024, 2029, and 2030 in PacifiCorp's 2023 CEIP Biennial Update and the direct testimony filed with the WUTC on June 17, 2024. PacifiCorp lacks the necessary information to respond to its current status in 2024 because PacifiCorp allocates based on actual loads over the total year, then allocates based on the approved allocation methodology. RECs also need to be processed, bucketed, and allocated, through the Western Renewable Energy Generation Information System (WREGIS), which only occurs after a year has completed. Accordingly, PacifiCorp does not yet know where it sits in relation to its clean energy interim targets for Washington at this point in 2024. The red line depicted in the graph above denoting "BCEIP targets" is, however, an accurate representation of where the Company expects to be in each year of the forecasted period. An updated analysis will be available as part of the Company's 2025 CEIP and will show the most up-to-date expectations of the Company's progress towards its 2030 CETA targets.
- (c) Please refer to the Company's response to WUTC Data Request 9 and PacifiCorp's direct testimony filed with the WUTC on June 17, 2024, for a discussion of the Company's ongoing procurements, while prudently managing costs.
- (d) PacifiCorp disagrees with the premise of the question. As stated in the Company's response to WUTC Data Request 9, and in direct testimony filed with the WUTC on June 17, 2024, the Company is currently procuring material amounts of system resources, and will continue to do so in future years, to meet the targets as defined by CETA. Additional procurement efforts will be proposed in subsequent CEIPs. These new resources will be in addition to renewable resources, along with necessary transmission capacity to deliver those resources, that the Company has already

procured and are scheduled to come online in 2024 and 2025 that will similarly contribute to the Company's CETA compliance progress.<sup>1</sup>

PREPARER: Rohini Ghosh  
SPONSOR: Matthew McVee

---

<sup>1</sup> See, e.g., *In re PacifiCorp's 2023 Washington General Rate Case*, Docket No. UE-230172 (approving 480 miles of new transmission lines (Gateway South and Gateway West D.1), and over 700 MWs of new wind resources (Rock Creek I and II, Rock River I, and Foote Creek II-IV)).

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.