

**Exh. JNS-13C  
Docket UE-210829  
Witness: Jaclynn N. Simmons  
REDACTED**

**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. 36*

**August 21, 2024**

**Designated Information is Confidential Per Protective Order in UTC Docket UE-210829  
REDACTED**

### WUTC Data Request 36

Rohini Ghosh, in RG-1T, at page 20 at line 20, states “[W]e are in advanced negotiations with third parties developing 755MW of battery storage capacity that can come online by summer of 2026.”

- (a) What does “advanced negotiations” mean in this context?
1. Does the Company have any signed contracts with the third parties they are negotiating with?
  2. Has a contract been drafted in these negotiations? How close to being finalized is this draft contract?
  3. In what time frame does the Company expect any negotiated contracts signed?
  4. Please provide Staff with all supporting documents around these negotiations.
- (b) How was the resource procured if not by a request for proposal?
- (c) How long will PacifiCorp have access to this resource?
- (d) How does this procurement get around PacifiCorp’s limitations in spending on capital expenditures?
- (e) How many MWs of renewable or non-emitting generation have been brought onto PacifiCorp’s system since the Commission’s approval of the 2022 AS RFP?
- (f) Please provide Staff with all documents concerning this procurement.

### Confidential Response to WUTC Data Request 36

- (a) Please refer to the Company’s responses to subparts 1. through 5. below:

1. [REDACTED]
2. Please refer to the Company’s response to subpart (a) 1. above.

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.

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3. Please refer to the Company's response to subpart (a) 1. above.
4. To not jeopardize ongoing commercially sensitive negotiations, the Company will provide updates on these negotiations, and any resulting procurement, in the upcoming 2025 Integrated Resource Plan (IRP) and Clean Energy Implementation Plan (CEIP) publications.

(b) [REDACTED]

(c) [REDACTED]

(d) PacifiCorp objects to this request to the extent it is vague and ambiguous as to the term "limitations in spending on capital expenditures". Subject to and without waiving the foregoing objection, the Company responds as follows:

In accordance with standard utility practice, PacifiCorp considers the impacts, and any potential impacts, to its credit metrics, borrowing capacity and overall liquidity in all resource procurement decisions.

(e) Please refer to the table provided below which lists [REDACTED]

	<u>Installed Megawatts</u> (MW)
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

(f) The Company directs Washington Utilities and Transportation Commission (WUTC) staff to the Company's 2020 All Source Request for Proposals (2020AS RFP), the 2021 IRP, the 2023 IRP and the 2023 general rate case (GRC), which discuss the resources that the Company has brought online, or plans to bring online, between

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2022 through 2026.

Confidential information provided subject to WAC 480-07-160 and the Commission's Protective Order, Order 02, issued on May 18, 2023, that governs the protection and access of confidential information in this docket.

PREPARER: Ron Scheirer

SPONSOR: Ron Scheirer / Rohini Ghosh