

**Exh. JNS-6  
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. 17*

**August 21, 2024**

## **WUTC Data Request 17**

Please explain why the effective load carrying capacity (ELCC) method was adopted for storage, wind, and solar resources in the most recent 2023 IRP Update filed 4/1/2024 (see page 41) rather than other available methods. Has it become less computationally intensive to utilize this methodology than in previous years such as the 2021 IRP Progress Report filed 3/31/2023 (see page 43).

### **Response to WUTC Data Request 17**

The computational intensity for PacifiCorp to perform effective load carrying capacity (ELCC) analysis has not changed.

The referenced capacity contribution assumptions from PacifiCorp's 2023 Integrated Resource Plan (IRP) Update are based on analysis performed by an external entity as part of the Western Resource Adequacy Program (WRAP). That analysis includes ELCC calculations for storage, wind, and solar in several regions across the WRAP footprint plus sub-allocation of capacity values among the resources of a given type within each region based on resource availability during critical hours. For details on the methodology applicable to different resource types, please refer to Section 4 (Qualifying Capacity Contribution of Resources) within the WRAP Business Practice Manual 105 which is publicly available and can be accessed by utilizing the following website link:

[https://www.westernpowerpool.org/private-media/documents/V1.0\\_BPM\\_105\\_Forward\\_Showing\\_Qualifying\\_Resources\\_12-07-2023.pdf](https://www.westernpowerpool.org/private-media/documents/V1.0_BPM_105_Forward_Showing_Qualifying_Resources_12-07-2023.pdf)

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