

**Exh. JNS-8  
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. 19*

**August 21, 2024**

## WUTC Data Request 19

### CETA Compliance:

- (a) How is PacifiCorp going to meet CETA compliance, specifically the 80 percent by 2030 CETA requirement?
- (b) How does PacifiCorp intend to acquire resources to fulfill the resource need identified in the current IRP?
- (c) Detail what actions PacifiCorp has already taken to acquire resources towards meeting its targets, including how many MW were acquired. For any actions PacifiCorp has taken, please explain when it expects these projects to be energized and what projected resources are to come online.
- (d) Outline the steps PacifiCorp has taken to ensure equity is considered through the acquisition process.

## Response to WUTC Data Request 19

- (a) PacifiCorp plans to comply with Washington's Clean Energy Transformation Act (CETA) target for 2030 (greenhouse gas (GHG) neutral standard that requires at least 80 percent of Washington retail sales is to be met with renewable or non-emitting energy, while up to 20 percent is met with alternative compliance) as laid out in the Company's most recent update to its Clean Energy Implementation Plan (CEIP), specifically, the 2023 CEIP Biennial Update.<sup>1</sup> The Company continues to re-evaluate its compliance needs against the CETA clean energy requirements in each planning cycle. Currently, development is underway for the Company's 2025 CEIP that will be filed in 2025 and will be based on the latest available information and inputs to inform the best path forward to meet all compliance requirements in 2030 and beyond.
- (b) The Company interprets that "the resource need identified in the current IRP" is intended to reference the identified compliance shortfall in PacifiCorp's 2023 Integrated Resource Plan (IRP) that served as the basis for creating the Washington CETA-compliant CEIP portfolio, presented in the 2023 CEIP Biennial Update. Based on the foregoing interpretation, the Company responds as follows:

This "compliance shortfall" was identified based on an assessment of Washington-allocated clean energy available to serve Washington retail sales in 2030 through 2041, and whether this clean energy was enough to serve 80 percent of Washington

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<sup>1</sup> PacifiCorp's 2023 Biennial CEIP Update filed November 1, 2023, in docket UE-21029.

retail sales.<sup>2</sup> Any resources identified to fill this compliance shortfall are assumed to be incremental additions to a systemwide optimized portfolio, necessary only to meet CETA requirements, and would be cost-allocated solely to Washington customers. The Company will continue to re-evaluate the potential resource needs for compliance purposes in each IRP and CEIP cycle and engage in resource procurement efforts for these state-specific resources.

- (c) Please refer to the Company's response to WUTC Data Request 9 and the direct testimony filed with the Washington Utilities and Transportation Commission (WUTC) on June 17, 2024. PacifiCorp is pursuing bilateral storage acquisition opportunities of new lithium-ion battery (Li-Battery) resources throughout its service territory to assure fulfilling resource needs during certain period of every day. PacifiCorp is discussing with several battery counterparties over 1,000 megawatts (MW) of opportunities dispersed through PacifiCorp's transmission system.
- (d) PacifiCorp is currently working on a program to incorporate equity into its decision-making processes and is participating in the WUTC proceedings to develop guidance for utilities on these issues.

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SPONSOR: Matthew McVee

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<sup>2</sup> Appendix O, Volume II, 2021 Two-Year Progress Report filed on March 31, 2023 in UE-200420.