BEFORE THE WASHINGTON

UTILITIES & TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP D/B/A PACIFIC POWER & LIGHT COMPANY

Respondent.

DOCKET UE-250224

CROSS-EXAMINATION EXHIBIT OF ROHINI GHOSH
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT

EXHIBIT RG-__X

PacifiCorp's Petition for Approval of a Revised Climate Commitment Act Forecast in Docket UE-220789

October 1, 2025

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of PACIFICORP d/b/a PACIFIC POWER & LIGHT COMPANY, Petition for Approval of a Revised Climate Commitment Act Forecast	Docket UE-220789 Petition

I. Introduction

1 Consistent with the Washington Utilities and Transportation Commission's (Commission) Orders 01 and 02,[1] PacifiCorp d/b/a Pacific Power & Light Company (PacifiCorp or Company) requests the Commission approve a revised demand and resource supply forecast for compliance with Washington's Climate Commitment Act (CCA) (Revised Forecast). This would permit the Company to update its prior CCA forecast to reflect the covered emissions consistent with the Washington resource portfolio in the Company's recently proposed multi-state cost allocation methodology (2026 Protocol) in the 2025 Power Cost Only Rate Case (PCORC).[2]

2 The Revised Forecast is in the public interest because it demonstrates that PacifiCorp's total covered emissions under the CCA would *decrease* by approximately 47.2~~41~~ percent under the 2026 Protocol. This materially advances the public interest and policy goals of the CCA and Washington's Clean Energy Transformation Act (CETA). And if approved, this Revised Forecast would increase the amount of no-cost allowances that

[1] *In re PacifiCorp's CCA Forecasts*, Docket No. UE-220789, Orders 01 and 02.
[2] *PacifiCorp v. WUTC*, Docket No. UE-250244, Exhibit RTL-2 (Apr. 1, 2025).

PacifiCorp is eligible to receive to offset the costs to comply with Washington's emissions reduction requirements by 17.4~~31~~ percent.

II. Background

3 PacifiCorp is an electric utility and public service company under RCW 80.04.010, and its public utility operations, retail rates, services, and accounting practices are subject to the Commission's jurisdiction. PacifiCorp also provides retail electricity service under the name Pacific Power in Oregon and California and under the name Rocky Mountain Power in Idaho, Utah, and Wyoming. The Company's principal place of business is 825 NE Multnomah Street, Suite 2000, Portland, Oregon 97232.

PacifiCorp's name and address:

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In addition, PacifiCorp respectfully requests that all data requests be addressed to:

By e-mail (preferred) datarequest@pacificorp.com

By regular mail Data Request Response Center
PacifiCorp
825 NE Multnomah Street, Suite 2000
Portland, OR 97232

Informal inquiries may be directed to Ariel Son, Regulatory Affairs Manager, at (503) 813-5410.

A. Washington's CCA

4 The CCA directs the Washington Department of Ecology (Ecology) to implement a cap-and-invest program to reduce statewide greenhouse gas emissions.[3] Covered entities must obtain allowances—either purchased from allowance auctions or administratively allocated by Ecology to qualifying entities—equal to their total covered emissions, and retire them to meet annual and four-year compliance period obligations.[4] To offset the costs to comply with the CCA for Washington electric utility customers, Ecology distributes no-cost allowances to electric utilities subject to CETA, based on the amount of emissions associated with energy that serves Washington retail customers.[5]

5 The distribution of no-cost allowances to qualifying electric utilities must be consistent with a Commission-approved forecast of a utility's resource-specific supply and retail electric demand.[6] This forecast must represent "the best estimate" of likely supply and demand during the compliance period, and must be based on a source that "most accurately" and "best predicts" the way the utility will actually comply with CETA.[7]

6 Ecology's rules generally defer to the Commission's judgment on what sources of information provide the most relevant or best estimate of a utility's supply and demand forecast.[8] For example, utility forecasts can include: Commission-approved forecasts from utility Clean Energy Implementation Plans (CEIP), or Integrated Resource Plans (IRP) that serve as the basis of CEIPs;[9] other sources that, based on Ecology's determination, are

[3] RCW 70A.65.060(1).
[4] *E.g.*, RCW 70A.65.070.
[5] RCW 70A.65.120(1).
[6] RCW 70A.65.120(2)(b); WAC 173-446-230(2).
[7] WAC 173-446-230(2)(c).
[8] WAC 173-446-230(2)(c)(iv).
[9] WAC 173-446-230(2)(c)(i)-(iii).

consistent with a forecast approved by the Commission;[10] and for multijurisdictional utilities like PacifiCorp, a Commission-approved multistate resource allocation methodology.[11]

7 The last year of the CCA's initial four-year compliance period is 2026.[12] Ecology will distribute no-cost allowances for 2026 based on approved CCA forecasts by October 1, 2025,[13] and Ecology must receive revised CCA forecasts by July 30, 2025.[14] If utilities do not have adequate no-cost allowances for covered emissions for 2026, they must purchase allowances through Ecology-administered CCA allowance auctions, or through third-party transactions.[15] By November 1, 2027, PacifiCorp must retire allowances equal to its covered emissions for the initial four-year compliance period (2023-2026)[16] and the allowances used for compliance must be of 2026 or any prior year vintage, or of a subset of allowances set aside each year for price control purposes.[17]

8 The program also allows for a true-up of no-cost allowances, based on actual emissions in a given year compared to the utility's forecast of covered emissions from prior years.[18] Through this true-up mechanism, any difference in actual emissions due to a change in allocation of resources beginning in 2026, could be reflected in Ecology's distribution of no-cost allowances on October 1, 2027,[19] just one month before the November 1, 2027, first compliance period obligation deadline.[20] It is not clear, however, whether Ecology could

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[10] WAC 173-446-230(2)(c)(iv).
[11] WAC 173-446-230(2)(c)(v).
[12] RCW 70A.65.070(1).
[13] WAC 173-446-230(2)(i).
[14] WAC 173-446-230(2)(j).
[15] *E.g.*, WAC 173-446-300 through -390.
[16] WAC 173-446-600(4).
[17] WAC 173-446-600(3), (4)(b).
[18] WAC 173-446-230(2)(g).
[19] WAC 173-446-230(2)(j).
[20] WAC 173-446-600(4).

distribute allowances of a 2026 or prior year vintage, which are necessary to meet the first compliance period obligation.

B. Prior CCA Forecasts

9 PacifiCorp is a covered entity,[21] and must have adequate allowances for the Company's covered emissions during the 2023-2026 compliance period.

10 On September 30, 2022, the Commission directed all covered investor-owned electric utilities to file four-year demand and resource supply forecasts for the years 2023-2026, the first CCA compliance period, pursuant to RCW 70A.65.120. The Commission approved the Company's initial CCA forecast, based on the 2021 IRP and CEIP, on January 24, 2023, with the condition that the Company notify the Commission if there are any substantive changes.[22]

11 On December 14, 2023, PacifiCorp requested the Commission approve a revised CCA forecast, to incorporate an approximate ten percent decrease in the Company's forecasted emissions from energy that serves Washington retail customers. This substantive decrease incorporated then-current analyses from the 2023 IRP (as PacifiCorp's initial CCA forecast was based on the 2021 IRP and CEIP). This revised forecast included an estimated 1,019,409 metric tons of carbon dioxide equivalent (MTCO2e) associated with energy that serves Washinton retail customers in 2026.

12 The Commission approved PacifiCorp's request,[23] and Ecology subsequently decreased PacifiCorp's no-cost allowances for the CCA's first four-year compliance period, assigning PacifiCorp 942,374 no-cost allowances in 2026. This slight decrease accounted for PacifiCorp's over-allocation of allowances during 2023 and 2024, caused by the difference

[21] RCW 70A.65.080(1).
[22] Docket No. UE-220789, Order 01.
[23] Docket No. UE-220789, Order 02 (May 23, 2024).

between a CCA forecast based on the 2021 IRP and CEIP, and actual and forecast emissions resulting from subsequent operations and the 2023 IRP.

C. Revised CCA Forecast

13 On April 1, 2025, PacifiCorp filed its PCORC which, among other things, proposed a new cost allocation methodology for the state of Washington and includes PacifiCorp's most recent forecast for 2026 net power costs.[24] If approved, this methodology will change the way the costs and benefits of various resources are allocated to Washington retail customers. Specifically, the methodology: (a) reallocates the Chehalis gas facility entirely to Washington, re-directing emissions from in-state generation solely to Washington customers; (b) removes Washington's allocation of the Hermiston gas plant; (c) increases Washington's share of the Rolling Hills wind facility; (d) removes coal resources from rates; and (e) provides Washington with a fixed share of other system generation already approved and in rates. Altogether, the proposed cost allocation methodology in the PCORC supports compliance with Washington law and policy while addressing resource adequacy and energy needs for the Company's Washington customers.

14 As detailed below, each of these resource allocations will impact the Company's total covered emissions under the CCA and the amount of allowances eligible for no-cost allowances. PacifiCorp has requested a January 1, 2026, rate effective date for the PCORC.

15 PacifiCorp's Revised Forecast incorporates each of these assumptions to estimate how much forecasted generation on a resource-by-resource basis is expected to serve Washington customers, from which the CCA forecast of emissions associated with energy serving Washington customers is determined. Consistent with the PCORC effective rate

[24] *In re PacifiCorp's 2025 PCORC,* Docket No. UE-250224 (Apr. 1, 2025).

period, this Revised Forecast would impact covered emissions under the final year of the CCA's initial four-year compliance period (2026).

III. Standard of Decision

16 To offset the cost burden associated with the CCA, Washington provides no-cost allowances to electric utilities for the emissions generated from electricity that serves Washington retail electric customers.[25] The Commission requires PacifiCorp to update its CCA forecast to account for any substantive changes,[26] and has found that, based on the facts and circumstances of prior petitions, a 10 percent decrease in forecasted emissions is substantive.[27]

IV. Petition

17 The Company requests approval of this Petition for the primary reason that it better supports the public interest: Overall covered emissions are forecasted to be *47.2*~~*41*~~ *percent lower* under the 2026 Protocol compared to the current forecast. This is caused by the: (a) reallocation of the Chehalis gas facility entirely to Washington, re-directing emissions from in-state generation solely to Washington customers; (b) removing Washington's allocation of the Hermiston gas plant; (c) increasing Washington's share of the Rolling Hills wind facility; (d) removing coal resources from rates; and (e) providing Washington with a fixed share of other system generation already approved and in rates. This strategic realignment better supports the CCA's greenhouse gas emissions reduction requirements and CETA's clean energy requirements.

[25] RCW 70A.65.120(1).
[26] Docket No. UE-220789, Order 01, ¶ 11.
[27] Docket No. UE-220789, Order 02, ¶ 12.

18 In support of this Petition, PacifiCorp represents that: (a) a 47.2~~41~~percent *decrease* (and 17.4~~31.5~~ percent *increase* in forecasted emissions eligible for no-cost allowances) for 2026 is a substantive change from PacifiCorp's currently approved CCA forecast that merits approval; (b) the 2026 Protocol most accurately forecasts PacifiCorp's covered CCA emissions for 2026; (c) it better supports the policies underlying the CCA and CETA, without harming Washington customer interests; and (d) the petition is timely, and if approved with adequate time to allow for PacifiCorp to submit this revised forecast to Ecology, ensures Washington customers do not have to pay substantially more to offset CCA compliance obligations from the proposed reallocations in the 2026 Protocol.

A. PacifiCorp's Revised Forecast should be approved because a 47.2~~41~~percent *decrease* in overall covered emissions, and a 17.4~~31.5~~ percent *increase* in forecasted emissions eligible for no-cost allowances, is a substantive change.

19 The Company's Revised Forecast, based on the new allocation methodology proposed in the PCORC, represents a substantive change in forecasted emissions associated with the energy allocated to serve Washington retail customers in 2026, the final year of the CCA's first compliance period. The Commission should approve this forecast because it results in a 47.2~~41~~percent decrease in overall covered emissions under the CCA,[28] and a 17.4~~31.5~~ percent increase in covered emissions that would be eligible for no-cost allowances.

20 This Revised Forecast relies on the net power cost model, the same model used by the Company in the PCORC. Table 1 below summarizes the proposed forecast compared to the existing WIJAM – 2023 IRP Forecast for 2026, and includes changes to PacifiCorp's forecasted retail sales, load, and emissions associated with the resource mix of each forecast.

[28] Discussed in Table 2 below.

PacifiCorp's analysis and information supporting Table 1 is included in Confidential Attachment A.

Table 1—Comparison of Prior and Revised CCA Forecasts for 2026[29][30]

	WIJAM - 2023 IRP Forecast		2026 Protocol - NPC Aurora Forecast (Alternate)			Delta	
	WA MWh	CO2e	Source	WA MWh	CO2e	WA MWh	CO2e
Retail Sales[31]	4,095,573		Retail Sales[32]	4,017,130			
Load[33]	4,721,760		Load[34]	4,441,744			
Non-Emitting Plants	2,384,744	-	Non-Emitting Plants	1,692,424	-	(692,320)[35]	-
Coal Plants[36]	-	-	Coal Plants	-	-	-	-
Gas Plants[37]	1,166,630	507,951	Gas Plants	2,467,646	1,074,413	1,301,016	566,462
Market Purchases (unspecified)[38]	1,170,386	511,459	Market Purchases (unspecified)	~~609,188~~ 281,674	~~266,215~~ 123,091	~~(561,198)~~ (888,712)	~~(245,244)~~ (388,367)
Market Sales	-	-	Market Sales	-	-	-	-
Total	4,721,760	1,019,409	Total	~~4,769,258~~ 4,441,744	~~1,340,628~~ 1,197,505	~~47,498~~ (280,016)	~~321,219~~ 178,095

[29] Resource allocation includes 3.503% loss factor for resources outside of Washington and excludes wholesale purchases as the company does not currently forecast them.
[30] Consistent with Commission Staff's identified error, Table 1 and related workpapers have been amended to reduce the estimate of Market Purchases under the 2026 Protocol – Aurora Forecast scenario from 609,188 MWh to 281,674 MWh, such that the total forecasted load equals the total forecasted generation. This change results in a requested 17.4 percent increase in covered emissions that would be eligible for no cost allowances.
[31] Washington Retail Sales corresponding to 2023 IRP Table A.11.
[32] Washington Retail Sales from UE-250224, Exhibit SLC-5, Page 6.
[33] Washington Load forecast 2023 IRP Table A.1.
[34] Washington Load from UE-250224, NEW-PAC-RJM-WA Direct-4-1-2025 (C).
[35] As noted by Dr. Rohini Ghosh in the PCORC, the 2026 Protocol increases the amount of renewable and non-emitting energy to Washington compared to WIJAM, and supports the Company's compliance with CETA. PacifiCorp's analysis in the PCORC filing compares the company's CETA compliance position under the WIJAM against the 2026 Protocol, using the NPC Aurora model on both resource allocations to most accurately predict the Company's generation of MWh from renewable and non-emitting resources. This Revised Forecast necessarily differs from the analysis in the PCORC because it compares emissions estimated under the 2026 Protocol, using the NPC Auroa model to emissions estimated under WIJAM using the 2023 IRP model, which is the source of the existing approved CCA forecast. This difference in analyses, and the 2023 IRP's over-estimate of energy from renewable and non-emitting resources serving Washington customers, accounts for the apparent decrease in renewable and non-emitting resources under the 2026 protocol in the table above—but again, this is only caused by the over-estimates included in the 2023 IRP/WIJAM.
[36] Using 1.0614 MT CO2e/MWh emissions factor.
[37] Using 0.4354 MT CO2e/MWh emissions factor.
[38] Using 0.4370 MT CO2e/MWh emissions factor.

21 This Table demonstrates that PacifiCorp's Revised Forecast results in an approximate seventeen~~thirty-one~~ percent increase in anticipated 2026 emissions eligible for no- cost allowances (emissions associated with energy serving Washington retail customers), growing from 1,019,409 metric tons of carbon dioxide equivalent (MT CO2e) under WIJAM allocations, to 1,197,505~~1,340,628~~ MT CO2e under the new allocation methodology. This includes a 556,462 MT CO2e increase from reallocation of natural gas facilities, and a ~~245,244~~388,367 MT CO2e decrease from unspecified market purchases.

22 These increased emissions are driven primarily by the proposed 100 percent allocation of the Chehalis gas plant to Washington retail customers, from the current 18.8 percent under the WIJAM.

B. The PCORC is the best and most accurate estimate of PacifiCorp's electricity demand and resource mix for 2026.

23 This Revised Forecast represents the "best" and "most accurate" estimate of PacifiCorp's forecasted electricity demand and resource mix during the compliance period.[39]

24 *First,* the net power cost aurora model, used in both this filing and the PCORC, includes PacifiCorp's most recent fuel price curves, and relies only on existing resources and power purchase agreements. This is contrasted with PacifiCorp's current CCA forecast that is based on information from the 2023 IRP, which is now two years out of date and includes speculative or proxy resources. While IRP or CEIP forecasts are more likely to provide a better estimate of forecasted emissions over multiple year-periods (as is the purpose of integrated resource planning periods),[40] the use of proxy resource costs can lead to underestimated emissions in specific years—especially when IRP data becomes dated. The

[39] WAC 173-446-230(2)(a)-(c).
[40] Docket No. UE-220789, Order 02.

proposed allocation methodology in the PCORC will better enable the Company to plan for and operate the system to meet Washington's law while addressing resource adequacy and mitigate these forecasting challenges.

25 *Second*, even though PacifiCorp recently filed its 2025 IRP, which includes an over twenty year supply and demand forecast, analyses from the PCORC are more reliable for the simple fact that the 2025 IRP/2025 CEIP filed later this year will be based on the WIJAM, and not the 2026 Protocol resource allocation methodology proposed in the PCORC. In the event the Commission approves the PCORC later this year, fully or in part, any new or revised resource allocation would not be reflected in a CCA forecast that was based on the 2025 IRP and the WIJAM.

26 *Third*, even if PacifiCorp relied on the demand forecast from the 2025 IRP, it presents only a small difference for 2026. The 2025 IRP forecasts an expected 4,573,810 MWh of Washington retail load for 2026; the PCORC forecasts an expected 4,441,744 MWh. This is only a three percent difference between the two retail load forecasts for the year. To avoid methodological inconsistences between using the demand forecast from the 2025 IRP, and a supply forecast from the PCORC, PacifiCorp represents it is more appropriate to rely on the current PCORC analyses and assumptions.

27 *Fourth*, it is consistent with Washington law. PacifiCorp's supply and demand forecast must be the best source to accurately predict CETA compliance, and Ecology provides for several acceptable methods. While the Commission has emphasized the value of a CEIP or IRP forecast over a net power cost model due to the "interlocking, iterative, and robust public processes between CEIPs and IRPs [that] attempt to ensure more transparency

and continuous improvement,"[41] Ecology also includes a catch-all category, accepting "another source that provides a utility's supply or demand forecast that is, based on ecology's analysis, consistent with an existing forecast" approved by the Commission. This catch-all category acknowledges there are circumstances where more reliable and accurate supply and demand forecast are found outside utility CEIPs or IRPs. Although the robust and iterative process of the CEIP and IRP may produce the best forecast for a *four-year* compliance period, it is precisely these lengthy processes that make these sources ill-equipped to forecast significant changes in specific years—especially when a single year of a compliance period would be impacted by a new allocation methodology.

28 The Commission should approve this Revised Forecast under WAC 173-446-230(2)(c)(iv), because it is the best and most likely estimate of PacifiCorp's electricity demand and resource mix for the final year of the CCA's first compliance period (2026).

C. The Revised Forecast protects Washington customers, while advancing the policy objectives of the CCA and CETA.

29 The Commission should approve this Petition, because it supports several important Washington policies.

30 *First,* the Revised Forecast protects Washington customers. The Legislature sought to mitigate the CCA's cost burden for Washington electricity customers through the distribution of no-cost allowances to utilities subject to CETA.[42] PacifiCorp's new allocation methodology proposed in the PCORC results in a substantial increase of emissions that are eligible for no-cost allowances, caused primarily by the reallocation of the Chehalis gas plant entirely to Washington customers. This Revised Forecast ensures that, if the Commission

[41] Docket No. UE-220770, 220789, 220797, Staff Memo, at 4-5 (Jan. 23, 2023).
[42] RCW 70A.65.120.

approves the new allocation methodology in the PCORC, Washington customers receive the appropriate amount of no-cost allowances to offset these increased CCA compliance obligations. If PacifiCorp relied on the prior CCA forecast, PacifiCorp would receive insufficient no-cost allowances to cover emissions from Chehalis for 2026, and our customers would have to pay for this increased compliance obligation.

31 In the event the Commission denies the 2026 Protocol in the PCORC, yet approves this Petition, PacifiCorp will not be unjustly enriched. In this circumstance, PacifiCorp will have received no-cost allowances based on a forecast of increased covered CCA emissions for 2026. Yet Ecology rules allow for a true-up of any over-allocation of CCA no-cost allowances.[43] Any over-allocation of no-cost allowances for 2026 (based on this Petition), would then be addressed in Ecology's distribution of no-cost allowances in October of 2027 for the 2028 compliance year—PacifiCorp would receive *reduced* no-cost allowances to account for the difference in forecasted and actual covered CCA emissions.

32 *Second*, this Revised Forecast support's Washington's emissions reduction requirements. Currently, all emissions from Chehalis are already covered emissions under the CCA because they are emitted in the state; the Revised Forecast only results in additional no-cost allowances for these same emissions. Therefore, the reallocation of the Chehalis gas plant entirely to Washington customers has no impact on the Company's total covered emissions under the CCA. However, the new allocation methodology removes other thermal resources that are currently allocated to Washington, including Washington's current share of the Hermiston gas plant. As shown on Table 2 below, compared to the previous forecast based on the 2023 IRP, the new allocation methodology reduces PacifiCorp's Washington

[43] WAC 173-446-230(2)(g).

total covered emissions under the CCA by 1,070,553~~927,430~~ MT CO2e, representing an approximate 47.2~~41~~ percent reduction. This reduction in PacifiCorp's total covered emissions advances the primary purpose of the CCA to reduce carbon pollution and achieve state mandated greenhouse gas limits. And for similar reasons, noted by Dr. Rohini Ghosh in the PCORC, the proposed new allocation methodology increases the amount of renewable and non-emitting energy to Washington, and supports the Company's compliance with CETA. PacifiCorp's analysis and information supporting Table 2 is included in Confidential Attachment B.

Table 2—PacifiCorp Total Washington CCA Covered Emissions[44]

	WIJAM - 2023 IRP		2026 Protocol - NPC Aurora Forecast			Delta	
	WA MWh	CO2e	Source	WA MWh	CO2e	WA MWh	CO2e
Retail Sales[45]	4,095,573		Retail Sales[46]	4,017,130			
Load[47]	4,721,760		Load[48]	4,441,744			
Non-Emitting Plants	2,384,744	-	Non-Emitting Plants	1,692,424	-	(692,320)[49]	-
Coal Plants[50]	-	-	Coal Plants	-	-	-	-
Gas Plants[51]	4,058,642	1,767,133	Gas Plants	2,467,646	1,074,413	(1,590,996)	(692,720)

[44] Resource allocation includes 3.503% loss factor for resources outside of Washington and excludes wholesale purchases as the company does not currently forecast them.
[45] Washington Retail Sales corresponding to 2023 IRP Table A.11
[46] Washington Retail Sales from UE-250224, Exhibit SLC-5, Page 6.
[47] Washington Load forecast 2023 IRP Table A.1.
[48] Washington Load from UE-250224, NEW-PAC-RJM-WA Direct-4-1-2025 (C).
[49] As noted by Dr. Rohini Ghosh in the PCORC, the 2026 Protocol increases the amount of renewable and non-emitting energy to Washington compared to WIJAM, and supports the Company's compliance with CETA. PacifiCorp's analysis in the PCORC filing compares the company's CETA compliance position under the WIJAM against the 2026 Protocol, using the NPC Aurora model on both resource allocations to most accurately predict the Company's generation of MWh from renewable and non-emitting resources. This Revised Forecast necessarily differs from the analysis in the PCORC because it compares emissions estimated under the 2026 Protocol, using the NPC Auroa model to emissions estimated under WIJAM using the 2023 IRP model, which is the source of the existing approved CCA forecast. This difference in analyses, and the 2023 IRP's over-estimate of energy from renewable and non-emitting resources serving Washington customers, accounts for the apparent decrease in renewable and non-emitting resources under the 2026 protocol in the table above—but again, this is only caused by the over-estimates included in the 2023 IRP/WIJAM.
[50] Using 1.0614 MT CO2e/MWh Emissions Factor.
[51] Using 0.4354 MT CO2e/MWh Emissions Factor.

Market Purchases (unspecified)[52]	1,170,386	500,925	Market Purchases (unspecified)	~~609,188~~ 281,674	~~266,215~~ 123,091	~~(561,198)~~ (888,712)	~~(234,710)~~ (377,834)
Market Sales	-	-	Market Sales	-	-	-	-
Total	7,613,722	2,268,058	Total	~~4,769,258~~ 4,441,744	~~1,340,628~~ 1,197,505	~~(2,844,514)~~ (3,172,028)	~~(927,430)~~ (1,070,553)

33 *Finally*, this forecast's increase in PacifiCorp's 2026 emissions eligible for no-cost allowances and decrease in total covered emissions will not disrupt Washington's carbon market. If the Commission approves this forecast, PacifiCorp will request Ecology to amend its distribution of no-cost allowances to the company. Although, PacifiCorp will request more no-cost allowances, since the total obligation decreases under the new forecast, there will be more allowances available in the market. Ecology will then have the ability to distribute these additional allowances through the agency's Allowance Price Containment Reserve market function.

D. This Petition is timely, and prompt consideration is warranted to address PacifiCorp's potential 2026 no-cost allowances shortfall.

34 The last year of the CCA's initial four-year compliance period is 2026.[53] Ecology will distribute no-cost allowances for 2026 based on approved CCA forecasts by October 1, 2025,[54] and Ecology must receive revised CCA forecasts by July 30, 2025.[55] This Petition is timely filed, as it is submitted well in advance of Ecology's July 30, 2025 deadline. To ensure PacifiCorp has the ability to address its potential short-fall in no-cost allowances by 2026, PacifiCorp requests the Commission approved this Petition by July 11, 2025.

[52] Using 0.4370 MT CO2e/MWh Emissions Factor.
[53] RCW 70A.65.070(1).
[54] WAC 173-446-230(2)(i).
[55] WAC 173-446-230(2)(j).

V. Conclusion

35 To ensure PacifiCorp receives adequate no-cost allowances for 2026, PacifiCorp respectfully requests the Commission approve this Revised Forecast.

Dated this 12~~16~~th day of June~~April~~, 2025,

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