

**Exh. JNS-3  
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. 8*

**August 21, 2024**

## WUTC Data Request 8

For each of the below, please indicate, as a percentage or/and in MWh, how much each contributed to a reduction in interim targets:

1. Allocation Methodology
2. RFP
3. Load
4. OTR
5. Thermal Assets

### Response to WUTC Data Request 3.8

The Company objects to this request because it has not performed the requested analysis. Without waiving this objection, the Company responds as follows:

The Company clarifies that “a reduction in interim targets” refers to the proposed updated clean energy interim targets in PacifiCorp’s 2023 Clean Energy Implementation Plan (CEIP) Biennial Update filed with the Washington Utilities and Transportation Commission (WUTC) on November 1, 2023, relative to the clean energy interim targets proposed in PacifiCorp’s Revised 2021 CEIP, filed with the WUTC on March 13, 2023. Based on the foregoing clarification, the Company responds as follows:

Please refer to the table below, which provides the originally proposed interim targets (from the Revised 2021 CEIP) and the updated proposed interim targets from the 2023 Biennial CEIP Update, for the current CEIP four-year period:

	2022	2023	2024	2025	Average
2021 Revised CEIP	31%	31%	40%	60%	41%
2023 Biennial CEIP Update	31%*	26%	25%	33%	29%

\*Originally estimated target for 2022 based on Revised 2021 CEIP, March 13, 2023

While the Company can highlight important elements that changed in the long-term resource planning modeling assumptions between the Revised 2021 CEIP and the 2023 Biennial Update, as well as the underlying allocation assumptions for Washington-allocated resources, it is difficult to make an apples-to-apples comparison between the two sets of targets given that they are based off completely different system-optimized portfolios that can change for all the reasons that the Integrated Resource Plan (IRP) changes every cycle. There have also been small changes to the compliance calculation for interim targets, reflecting improvements in the Company’s understanding of the

categorization of Clean Energy Transformation Act (CETA)-qualifying generation (for example, including qualifying hydro resources as “REC-generating” rather than as “non-emitting”).<sup>1</sup> The Company cannot, with certainty, attribute a percentage change in the targets with a one-unit change in a specific variable or assumption as asked here.

Please refer to Attachment WUTC 8, which provides a comparison between the high-level outcomes for the 2022 through 2025 CEIP period, for PacifiCorp’s 2023 CEIP Biennial Update (based on PacifiCorp’s 2023 IRP) relative to PacifiCorp’s Revised 2021 CEIP (based on the 2021 IRP). While again, it is impossible to draw a 1:1 conclusion that a unit change in any assumption drove a percentage or megawatt-hour (MWh) change in any line-item that contributes towards the calculation of Clean Energy Transformation Act (CETA) targets, it is useful to look at the deltas.

The increase in the retail sales in the 2023 CEIP Biennial Update (load net of losses, demand-side management (DSM), and private generation (PG)), which is used in the denominator in the calculation of an interim target, increased by approximately 37 to 52 gigawatt-hours (GWh) in each year. Conversely, in the same years, total Washington-allocated renewable energy credit (REC) generating resources decreased by approximately 170 GWh in 2023 to over 1,000 GWh less REC-generating resources in 2025. The decrease in REC-generating resources can be traced back to, but is not limited to, several factors:

1. The forecasted system-generation (SG) allocation factor for Washington is decreasing over time due to relatively lower load growth on the system compared to other jurisdictions, leading to less MWh of all resources, including all REC-generating resources.
2. The forecasted SG allocation factors applied in the 2023 CEIP Biennial Update are lower than the proposed post-interim period allocation factors that were applied in the Revised 2021 CEIP, leading to less MWh of all resources, including all REC-generating resources.
3. There are less new wind and solar resources scheduled to come online by 2025.
4. There is less need for additional (potentially REC-generating) resources for Washington customers as there is additional thermal generation to serve load from both coal resources extended through the end of 2025 and coal-to-gas conversions available to serve from 2024 through the end of 2029.

PREPARER: Rohini Ghosh

SPONSOR: Rohini Ghosh

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<sup>1</sup> In reference to CETA legislation laid out in RCW 19.405.020 (28) and RCW 19.405.020 (24).