

REDACTED
Docket No. UE 434
Exhibit PAC/200
Witness: James C. Owen

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

PACIFICORP

REDACTED
Direct Testimony of James C. Owen

February 2024

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Highly Confidential Exhibit PAC/201—Hunter/Wolverine CSA Analysis

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1 **I. INTRODUCTION AND QUALIFICATIONS**

2 **Q. Please state your name, business address, and present position with PacifiCorp**
3 **d/b/a Pacific Power (PacifiCorp or the Company).**

4 A. My name is James C. Owen. My business address is 1407 West North Temple, Suite
5 210, Salt Lake City, Utah 84116. My title is Vice President of Environmental, Fuels,
6 and Mining.

7 **Q. Briefly describe your education and professional experience.**

8 A. I have a Bachelor of Science Degree in Mining Engineering, a Master of Business
9 Administration Degree, and a Juris Doctor Degree, all from the University of Utah.
10 I joined the Utah Department of Natural Resources – Division of Oil Gas and Mining
11 in November 2008, and held positions of increasing responsibility within the agency,
12 including responsibilities for environmental permitting, enforcement of
13 environmental compliance, engineering design, oversight of mine reclamation
14 bonding, environmental program management, and legislative and policy
15 management. I joined PacifiCorp as Director of Environmental in February 2018.
16 I have assumed positions of increasing responsibility since that time and currently
17 serve as Vice President of Environmental, Fuels, and Mining. My current
18 responsibilities encompass strategic planning, stakeholder engagement, regulatory
19 support, support of major generation resource additions, direct oversight of fueling
20 strategy, management of mining operations, and direct oversight of major
21 environmental compliance projects.

22 **Q. Have you testified in previous regulatory proceedings?**

23 A. Yes. I have previously provided testimony on behalf of the Company in proceedings

1 before the Public Utility Commission of Oregon (Commission) and the public utility
2 commissions in California, Idaho, Utah, and Wyoming.

3 **II. PURPOSE AND SUMMARY**

4 **Q. What is the purpose of your testimony in this proceeding?**

5 A. I explain PacifiCorp's overall approach to providing the coal supply for its coal-fired
6 generating plants, and I support the level of coal costs included in fuel expense in
7 PacifiCorp's 2025 Transition Adjustment Mechanism (TAM). To demonstrate the
8 reasonableness of these costs, my testimony:

- 9 • Discusses recent changes in coal market conditions and how those changes
10 impact the 2025 TAM fuel costs;
- 11 • Provides details of any new coal supply agreement (CSA) that PacifiCorp
12 entered into since the 2024 TAM that impacts the 2025 TAM;
- 13 • Provides an update to its coal pricing and background on third-party coal
14 contracts and affiliate-owned mines; and
- 15 • Discusses the Bridger Coal Company (BCC) mine plan analysis for the Jim
16 Bridger plant.

17 **III. CHANGES IN COAL MARKET CONDITIONS**

18 **Q. What significant changes have occurred in the coal market for PacifiCorp since**
19 **the 2024 TAM?**

20 A. The coal market continues to experience similar issues to the ones highlighted in the
21 2024 TAM filing. The unprecedented increase in coal prices, instability in coal supply
22 and overall market fluctuations continue to cause adverse impacts to PacifiCorp and
23 other large consumers. This negative impact is due to multiple factors, including but

1 not limited to: increased coal demand due to high domestic natural gas prices; low
2 inventories at coal-fired power plants; increased demand abroad for coal exports;
3 international and domestic supply chain constraints; labor and material shortages;
4 weather events and general market inflation.¹

5 Specifically, as mentioned in detail in my 2024 TAM direct testimony, the
6 Lila Canyon mine fire removed approximately 25 percent of Utah coal production
7 and disrupted the same portion of PacifiCorp's coal supply needs in Utah.² On
8 November 18, 2023, PacifiCorp was informed that the Lila Canyon mine will not
9 reopen and will be permanently closed. The closure of Lila Canyon created a
10 significant coal production shortfall in Utah in 2023 and will continue to have
11 negative impacts to all large consumers, including PacifiCorp, in 2024 and 2025.

12 In addition to the Lila Canyon mine issues in Utah, coal suppliers continue to
13 experience issues relating to unfavorable geologic and mining conditions, delays and
14 pressure relating to securing federal mining leases, limited availability of trucking and
15 railway transportation for coal, long lead-times for procurement of necessary mining
16 equipment, and limitations in availability of financing, which has put them at an
17 increased risk of becoming insolvent.

18 **Q. Has the Company experienced any new force majeure claims by its coal**
19 **suppliers due to the volatile coal market conditions since the 2024 TAM?**

20 A. Yes. The Company received force majeure claims from two of its major coal
21 suppliers in the latter half of 2023. [REDACTED]

¹ *In the Matter of PacifiCorp d/b/a Pacific Power, 2024 Transition Adjustment Mechanism*, Exhibit PAC/200, Owen/3-7 (April 3, 2023).

² *In the Matter of PacifiCorp d/b/a Pacific Power, 2024 Transition Adjustment Mechanism*, Exhibit PAC/200, Owen/4 (April 3, 2023).

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED] The impact of reduced

7 available coal supplies and higher coal pricing discussed above informed both coal
8 volumes and pricing assumptions in the 2025 TAM.

9 **Q. Can PacifiCorp use coal supplier force majeure claims to renegotiate contract**
10 **terms?**

11 A. [REDACTED]
12 The Company focuses on achieving its target coal supply at a reasonable price, along
13 with contract terms that provide flexibility. However, in Utah’s current supply-
14 constrained market, the Company has limited leverage to accomplish these goals.

15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]

³ *In the Matter of PacifiCorp d/b/a Pacific Power, 2024 Transition Adjustment Mechanism, Exhibit PAC/500, Owen/15 (April 3, 2023).*

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 **Q. How are PacifiCorp’s coal facilities impacted by the coal supply constraints in**
5 **Utah, and how has that been reflected in coal volumes for the 2025 TAM?**

6 A. Since 2022, both Hunter and Huntington plants have not received their contracted
7 coal volumes due to the various reasons discussed in my testimony. These coal supply
8 shortages along with market instability are expected to remain in 2024 and 2025.

9 Specifically in 2024 and 2025, the Company forecasted the Hunter/Bronco CSA [REDACTED]

10 [REDACTED]

11 [REDACTED].⁴ Confidential Table 1 provides a breakdown of the Hunter/Bronco

12 CSA contractual tons versus the actual/forecast delivered tons, from 2023 to 2025:⁵

13 **Confidential Table 1: Contractual Tons vs. Actual/Forecast Delivered Tons**

Hunter/Bronco CSA Third Amendment Contractual Tons vs. Actual/Forecast Delivered Tons		
Year	Contractual Tons	Delivered Tons (Actual/Forecast)
2023	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]

*The contractual tons and actuals/forecast delivered tons are 100% Hunter Plant.

14 Additionally, the Company forecasted coal delivered at the Huntington plant under
15 the Huntington/Wolverine CSA for 2024 [REDACTED]

16 [REDACTED]. Confidential Table 2

⁴ *In the Matter of PacifiCorp d/b/a Pacific Power, 2024 Transition Adjustment Mechanism*, Exhibit PAC/500, Owen/9, 12, and 19 (July 24, 2023).

⁵ The 2025 TAM Direct values in the tables throughout testimony are rounded for display purposes, but the underlying calculations for variances and totals are not based on the rounded display values.

1 provides a comparison of the Huntington/Wolverine CSA and the Hunter/Wolverine
2 CSA contractual tons versus the actual/forecast delivered tons, from 2023 to 2025:

3 **Confidential Table 2: Contractual Tons vs. Actual/Forecast Delivered Tons**

Year	Huntington/Wolverine CSA		Hunter/Wolverine CSA	
	Contractual Tons (Range)	Delivered Tons (Actual/Forecast)	Contractual Tons (Range)	Delivered Tons (Actual/Forecast)
2023	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2024	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
2025	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

*The contractual tons and actuals/forecast delivered tons are 100% Hunter Plant.

4 Due to these shortfalls, PacifiCorp has adjusted its forecasts for coal received and
5 consumed at Hunter and Huntington plants in the 2025 TAM. Accordingly, the
6 forecast volumes of consumed coal in 2025 do not match the contracted volumes for
7 coal in the CSAs for the calendar year 2025. Furthermore, to ensure targeted coal
8 inventory balances are available for reliability purposes, received and consumed coal
9 quantities at the Utah plants are balanced in the 2025 TAM and stockpiled inventory
10 remains mostly flat.

11 **Q. How has the increase in market coal prices impacted the 2025 TAM estimated
12 fuel costs?**

13 A. Similar to the 2024 TAM, the total coal fuel expense is estimated to decrease in the
14 2025 TAM, but coal prices on a per-ton basis increase at some plants. Historically,
15 the Company’s prudent coal contracting practices have largely shielded the Company
16 and its customers from significant, short-term coal price increases. Currently, due to
17 the increased demand for coal in both foreign and domestic markets, coal suppliers
18 have increased opportunities for coal sales. Additionally, the mining, economic and
19 geologic issues have caused multiple force majeure claims from PacifiCorp coal

1 suppliers in 2022 and 2023 which has contributed to the limited volume of coal
2 available for PacifiCorp in 2024 and 2025. Nevertheless, PacifiCorp took reasonable
3 and prudent steps to overcome these issues by including fixed pricing provisions in its
4 CSAs that do not escalate with general inflation. As a result, the impact of the
5 increased coal pricing is largely contained to the circumstances in which the
6 Company was forced to respond to suppliers force majeure claims. Specifically, the
7 increased market prices are impacting 2025 pricing at the Wolverine, Gentry, and
8 Bronco mines which serve the Hunter plant.

9 IV. THIRD-PARTY COAL CONTRACTS

10 **Q. Has PacifiCorp entered into any new CSAs since it filed reply testimony in the**
11 **2024 TAM?**

12 **A.** No. PacifiCorp has not executed any CSAs or CSA amendments since the 2024 TAM
13 Reply Update that impact coal deliveries in 2025.⁶ However, in response to
14 continuing and increasing risk of decline in available coal supply and ongoing
15 operational challenges, the Company has been negotiating with Wolverine for several
16 months and will be finalizing and executing amendments to its existing CSAs with
17 Wolverine for its Hunter and Huntington plants. PacifiCorp anticipates these
18 amendments will be finalized in the near future. As discussed in detail below, the
19 Company is planning to provide additional information during a workshop to be held
20 before April 1, 2024, including information relating to the Hunter/Wolverine CSA
21 and Huntington/Wolverine CSA amendments. The Company also expects to provide
22 a detailed analysis of these amendments in its 2025 TAM Reply Update. Table 3

⁶ Consistent with the requirements for Order No. 22-389, the analysis for Hunter/Wolverine CSA dated June 7, 2023, is provided in Exhibit PAC/201.

1 below summarizes the CSAs that are in effect for the year 2025 as of January 2024:

2 **Table 3: 2025 TAM - Existing CSAs**

Third-Party CSAs In Effect for 2025 TAM		
Plant	Supplier / Mine	CSA End Date
Craig	Trapper Mining / Trapper	Dec 2025
Dave Johnston	Peabody / Caballo	Dec 2025
Hayden	Peabody / Twentymile	Dec 2027
Hunter	Gentry / Bear Canyon # 3	Dec 2025
Hunter	Bronco / Emery	Dec 2025
Hunter	Wolverine / Various	Dec 2025
Huntington	Wolverine / Various	Dec 2029
Naughton	Kemmerer Operations / Kemmerer	Dec 2025
Wyodak	Wyodak Resources Development	Dec 2026

3 **Q. Please discuss the change in overall third-party coal-supply costs in the 2025**
4 **TAM.**

5 A. PacifiCorp expects a price variance net increase for the third-party coal-supply costs
6 of [REDACTED], as shown in Confidential Table 6 further below.

7 **V. HUNTER PLANT COAL COSTS**

8 **Q. Please describe the change in delivered coal costs at the Hunter plant in the 2025**
9 **TAM.**

10 A. The price of delivered coal from Bronco Utah Operations, LLC [REDACTED] from
11 [REDACTED] per ton in the 2024 TAM Reply Update to [REDACTED] per ton in the 2025 TAM
12 Direct Filing. This [REDACTED] is per the pricing terms of the Hunter/Bronco CSA third
13 amendment that terminates on December 31, 2025. However, the price of delivered
14 coal per ton [REDACTED] for Wolverine from the 2024 TAM Reply Update at
15 [REDACTED] per ton followed by a [REDACTED] in price per ton for Gentry from [REDACTED] per ton
16 in the 2024 TAM Reply Update to [REDACTED] per ton in the 2025 TAM per the contract
17 terms.

1 **Q. The Commission’s 2023 TAM Order directed PacifiCorp to hold a workshop with**
2 **parties within a reasonable amount of time prior to filing the 2025 TAM regarding**
3 **the execution of the Hunter plant CSA.⁷ Why did PacifiCorp request an extension**
4 **of time for holding this workshop?**

5 A. PacifiCorp filed a motion on February 1, 2024, requesting the Commission modify
6 Order No. 22-389. The Commission approved the motion on February 8, 2024.⁸ In the
7 motion, the Company requested to hold the workshop by April 1, 2024, instead of
8 prior to filing the 2025 TAM. This modification was requested to allow PacifiCorp to
9 provide TAM parties with the latest information regarding the Company’s fueling
10 plans for the Hunter plant in calendar year 2025.

11 **Q. In the Commission’s 2023 TAM Order, the Commission also stated that “[w]hen**
12 **a new CSA is under negotiation and thus only a forecast is incorporated in a**
13 **TAM, the first-year anticipated nomination as well as estimations of the total**
14 **cost forecast are necessary.”⁹ Has this information been provided?**

15 A. All CSAs the Company is presently able to forecast that it will execute in 2024 which
16 impact the 2025 TAM are shown in Confidential Table 5 below in the “Open
17 Positions” section. The forecasted costs of these anticipated contracts are reflected in
18 the workpapers included with the direct filing. The pricing, volumes, and other key
19 terms of the amendments to the Hunter/Wolverine CSA and Huntington/Wolverine
20 CSA could not be clearly determined or estimated at the time the 2025 TAM figures

⁷ *In the Matter of PacifiCorp d/b/a Pacific Power, 2023 Transition Adjustment Mechanism*, Docket No. UE 400, Order No. 22-389 at 7 (Oct. 25, 2022).

⁸ *In the Matter of PacifiCorp d/b/a Pacific Power, 2023 Transition Adjustment Mechanism*, Docket No. UE 400, Order No. 24-031 at 1–2 (Feb. 8, 2024).

⁹ *In the Matter of PacifiCorp d/b/a Pacific Power, 2023 Transition Adjustment Mechanism*, Docket No. UE 400, Order No. 22-389 at 5 (Oct. 25, 2022).

1 were calculated for the direct filing in January 2024. Therefore, the terms of these
2 amendments will be discussed in detail in the upcoming workshop and the pricing
3 will be included in the Reply Update.

4 **VI. OVERVIEW OF PACIFICORP'S COAL SUPPLIES**

5 **Q. How does PacifiCorp plan to meet fuel supply requirements for its coal plants in**
6 **2025?**

7 A. PacifiCorp employs a diversified coal supply strategy, as reflected below in
8 Confidential Table 5. PacifiCorp will supply [REDACTED] percent of its 2025 coal
9 requirements with third-party coal supplies and [REDACTED] percent with coal from its
10 captive affiliate mines. Within the third-party contracts: (1) [REDACTED] percent of the total
11 coal requirement will be supplied from fixed-price contracts; (2) [REDACTED] percent will be
12 supplied under variable-priced contracts that increase or decrease based on changes to
13 producer and consumer price indices; and (3) [REDACTED] percent of the total coal
14 requirement will be supplied from contracts for the Jim Bridger and Dave Johnston
15 plants to be negotiated in 2024.

1

Confidential Table 5: Coal Source Deliveries

2025 Company/Mine	Plant	Price Reopener	New Contract	MMBtus (000s)	MMBtus (000s)	Percent
Affiliate Mines						
Bridger Coal/Bridger	Jim Bridger					
Trapper Mining/Trapper	Craig					
Subtotal Affiliate Mines						18.5%
Fixed Price Contracts						
Wolverine/Various	Huntington					
Bronco/Emery	Hunter					
Gentry Mountain/Gentry	Hunter					
Wolverine/Various	Hunter					
Peabody/Twentymile	Hayden					
Peabody/Caballo	Dave Johnston					
Kenmerer Operations	Naughton					
Subtotal Fixed Price Contracts						58.6%
Variable Price Contracts						
Westmoreland/Rosebud	Colstrip					
Black Hills/Wyodak	Wyodak					
Subtotal Variable Price Contracts						12.5%
Open Positions						
Unspecified PRB Mines	Dave Johnston					
Unspecified PRB Mines	Jim Bridger					
Total Other						10.3%
Total Coal Supplies						100%

Note: Delivered MMBtus are calculated from consumption estimates provided by the generation forecast in Aurora to accommodate targeted inventory stockpiles

2 **Q. Has total coal fuel expense in the 2025 TAM decreased from the level reflected in**
 3 **PacifiCorp’s 2024 TAM?**

4 A. Yes. Total coal fuel expense has decreased by \$3.3 million in the 2025 TAM. This
 5 decrease is the result of a \$27.7 million volume reduction in coal-fired generation,
 6 offset by approximately \$24.4 million in higher coal prices. These variances are
 7 shown in Confidential Table 6 below.

1

Confidential Table 6: Coal Fuel Variance - 2025 TAM vs. 2024 TAM

Plant	Contract	Millions (\$)
Price Variance		
<u>Affiliate Mines</u>		
Jim Bridger	Bridger Coal Company	
Craig	Trapper Mining	
Subtotal Affiliate Mines		
<u>Third-Party Contracts</u>		
Naughton	Kemmerer Operations	
Wyodak	Wyodak Resources	
Dave Johnston	Powder River Basin	
Dave Johnston	BNSF	
Jim Bridger	Powder River Basin	
Hunter	Wolverine Fuels	
Hunter	Bronco	
Hunter	Gentry Mountain	
Huntington	Wolverine Fuels	
Colstrip	Westmoreland	
Hayden	Peabody	
Subtotal Third-party Contracts		
Total Price Variance		\$ 24.4
Volume Variance		
Jim Bridger		
Craig		
Hunter		
Dave Johnston		
Wyodak		
Other Plants		
Total Volume Variance		\$ (27.7)
Total Coal Fuel Variance - Increase/(Decrease)		\$ (3.3)

1 **Q. Please provide an overview of the cost changes by supplier in the 2025 TAM.**

2 A. Confidential Tables 7 through 9 compare values from the 2025 TAM Direct Filing to
3 the 2024 TAM Reply Filing. Confidential Table 7 shows updates to the delivered price
4 per ton from each supplier:

5 **Confidential Table 7**

Delivered Price per Ton of Coal						
Plant	Supplier	2025 TAM Direct	2024 TAM Reply	Variance- \$	Variance- %	Variance Explanation
Colstrip	Westmoreland/Rosebud					
Craig	Trapper Mining Inc					
Dave Johnston	Peabody/NARM					
Dave Johnston	Peabody/Caballo					
Dave Johnston	Unspecified PRB Mines					
Dave Johnston	Eagle Butte					
Hayden	Peabody/Twenty mile					
Hunter	Wolverine/Various					
Hunter	Bronco/Emery					
Hunter	Gentry/Gentry					
Huntington	Wolverine/Various					
Jim Bridger	Bridger Coal Company					
Jim Bridger	Unspecified PRB Mines					
Naughton	Kemmerer Operations					
Wyodak	Black Hills/Wyodak					

1 Confidential Table 8 compares the tons of coal consumed:

2 **Confidential Table 8**

Consumed Volume (tons, millions)				
Plant	2025 TAM Direct	2024 TAM Reply	Variance \$	Variance %
Colstrip				
Craig				
Dave Johnston				
Hayden				
Hunter				
Huntington				
Jim Bridger				
Naughton				
Wyodak				
Total	11.1	11.9	(0.9)	(7%)

3 Confidential Table 9 details the changes to total coal fuel costs:

4 **Confidential Table 9**

Fuel Cost (\$, millions)				
Plant	2025 TAM Direct	2024 TAM Reply	Variance \$	Variance %
Colstrip				
Craig				
Dave Johnston				
Hayden				
Hunter				
Huntington				
Jim Bridger				
Naughton				
Wyodak				
Total	529.9	533.2	(3.3)	(1%)

5 Coal fuel costs have decreased by \$3.3 million, driven mainly by a reduced coal
6 generation forecast in the 2025 TAM Aurora results.

1 **Q. The Commission has periodically requested a current version of the “Contract**
2 **Minimum” table provided in docket UE 390 in response to ALJ Bench Request**
3 **1. Has PacifiCorp provided this updated table?**

4 A. Yes, this information has been provided as Confidential Exhibit PAC/202.

5 **VII. JIM BRIDGER FUEL SUPPLY**

6 A. **Bridger Coal Company**

7 **Q. Please briefly summarize the benefits for PacifiCorp customers which are**
8 **associated with PacifiCorp’s partial ownership of BCC.**

9 A. Ownership in BCC allows PacifiCorp to flex coal deliveries up or down, within
10 certain constraints, to better align Jim Bridger plant delivered and consumed coal
11 quantities. Mine ownership also reduces coal supply delivery risk and mitigates
12 unfavorable impacts of unexpected coal delivery changes.

13 **Q. Please describe the change in BCC costs in the 2025 TAM.**

14 A. BCC costs in the 2025 TAM are forecast to be [REDACTED] higher than the
15 2024 TAM Reply Update. The cost for the base mine plan increased by [REDACTED]
16 or [REDACTED] per ton, from [REDACTED] per ton in the 2024 TAM Reply Update to [REDACTED] per
17 ton in the 2025 TAM as shown in Confidential Table 10. The 2025 TAM assumes
18 [REDACTED] base tons are delivered, which is [REDACTED] less tons delivered than in
19 the 2024 TAM Reply Update. In the 2025 TAM, the cost for supplemental coal
20 decreases by [REDACTED] per ton, from [REDACTED] per ton in the 2024 TAM Reply Update to
21 [REDACTED] per ton in the 2025 TAM. These cost details are included in Confidential
22 Table 10 below.

1

Confidential Table 10: Jim Bridger Plant Coal Deliveries

	2025 TAM			2024 TAM			Variance			Price
	Tons	Dollars	\$ / Ton	Tons	Dollars	\$ / Ton	Tons	Dollars	\$ / Ton	Variance
Bridger Coal Deliveries										
Bridger Base Mine Plan										
Supplemental Coal										
Total Bridger Coal										
Unspecified PRB Mines										
Total Jim Bridger Plant										

2 **Q. Please summarize why BCC mine costs increase by [REDACTED] in the 2025**
 3 **TAM.**

4 **A.** The price increase is primarily due to delivering [REDACTED] less tons in the 2025
 5 TAM vs the 2024 TAM Reply Update and an increase in production tax valuation.

6 **Q. In the stipulation approved by the Commission in the 2023 TAM, PacifiCorp is**
 7 **required to provide the annual BCC mine plan. Has this document been**
 8 **provided in the workpapers to this filing?**

9 **A.** Yes, this document is included with my confidential workpapers.

10 **Q. In Order No. 13-387, the Commission ordered the Company to remove certain**
 11 **operations and maintenance costs embedded in the costs of coal from its affiliate**
 12 **captive mines.¹⁰ In this filing, does PacifiCorp adjust the price of coal from BCC**
 13 **consistent with this order?**

14 **A.** Yes. In the 2025 TAM the Company reduces BCC costs by approximately
 15 [REDACTED] to reflect removal of management overtime and 50 percent of annual
 16 incentive plan awards.

¹⁰ *In the Matter of PacifiCorp d/b/a Pacific Power 2014 Transition Adjustment Mechanism*, Docket No. UE 264, Order No. 13-387 (Oct. 28, 2013).

1 **B. Jim Bridger Third-Party Coal Supply**

2 **Q. Did PacifiCorp execute a new CSA with Black Butte Coal Company since the**
3 **2024 TAM Reply Update?**

4 A. No, PacifiCorp did not renew its existing CSA with Black Butte. Due to shortfalls in
5 contracted deliveries during 2023, resulting from a force majeure event at the mine, a
6 portion of the 2023 contract coal from Black Butte will be delivered during 2024. The
7 Company currently anticipates no coal will be purchased from Black Butte in 2025.

8 **Q. Does PacifiCorp anticipate signing a new CSA in 2024 for coal supply from the**
9 **Powder River Basin (PRB) during 2025?**

10 A. Yes. The Company expects to issue a request for proposals in 2024 or 2025 for
11 additional coal supply in 2025 for Jim Bridger beyond what BCC can supply. The
12 amount to be purchased will be determined based upon the Company's current policy
13 and forecast market conditions.

14 **VIII. OZONE TRANSPORT RULE**

15 **Q. Has the Company included any costs in this filing due to the impacts of the**
16 **United States (U.S.) Environmental Protection Agency's (EPA) interstate OTR**
17 **also known as the good neighbor plan?**

18 A. The Company did not include OTR costs in its 2025 TAM forecast because: (1) the
19 U.S. Tenth Circuit Court of Appeals granted petitioners', including PacifiCorp,
20 motion to stay the EPA's final disapproval of Utah's OTR state implementation plan
21 (SIP) on July 27, 2023; and (2) EPA proposed approval of Wyoming's OTR SIP on
22 August 14, 2023. While timelines cannot be predicted precisely, the OTR stay for the
23 state of Utah is still under litigation with the U.S. Tenth Circuit Court of Appeals and

1 is expected to remain in place at least through the 2024 ozone season. For Wyoming,
2 the EPA published its final approval of Wyoming's interstate ozone transport plan in
3 the Federal Register on December 19, 2023. The final approval of Wyoming's plan
4 removes cross-state ozone transport requirements from electric generating units in the
5 state, including PacifiCorp's generating units. As a result, Wyoming is not subject to
6 the OTR federal implementation plan.

7 **IX. CONCLUSION**

8 **Q. Please summarize the benefits of PacifiCorp's coal fuel strategy.**

9 A. Customers have significantly benefited from PacifiCorp's prudent and diversified
10 fueling strategy, which relies upon fixed-price contracts, index-priced contracts, and
11 affiliate-owned mines to meet the fuel needs of its coal-fired generating plants. The
12 overall decrease in coal fuel expense in this filing is primarily due to reduced coal
13 volumes, as shown in Confidential Table 6 above. PacifiCorp's fixed price coal
14 contracts have continued to benefit customers as natural gas and power prices rise.
15 However, the demand and cost for coal has increased both nationally and globally,
16 and PacifiCorp continues to work with its coal suppliers and mines to ensure the best
17 risk-adjusted pricing for the benefit of our customers.

18 **Q. Does this conclude your direct testimony?**

19 A. Yes.

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Exhibit Accompanying Direct Testimony of James C. Owen

Hunter/Wolverine CSA Analysis

February 2024

**THIS EXHIBIT IS HIGHLY CONFIDENTIAL IN
ITS ENTIRETY AND IS PROVIDED UNDER
SEPARATE COVER**

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Exhibit Accompanying Direct Testimony of James C. Owen

CSA Contract Minimum Table

February 2024

Confidential: Coal Supply Agreement Contract Minimums in Tons

Plant	Coal Mine	2025 Contractual Minimum	2025 TAM Forecast Deliveries	Minimum %
Colstrip	Rosebud	[REDACTED]	[REDACTED]	[REDACTED]
Craig	Trapper	[REDACTED]	[REDACTED]	[REDACTED]
Dave Johnston	Caballo	[REDACTED]	[REDACTED]	[REDACTED]
Dave Johnston Total		[REDACTED]	[REDACTED]	[REDACTED]
Hayden	Twentymile	[REDACTED]	[REDACTED]	[REDACTED]
Hunter	Wolverine	[REDACTED]	[REDACTED]	[REDACTED]
Hunter	Gentry	[REDACTED]	[REDACTED]	[REDACTED]
Hunter	Bronco ¹	[REDACTED]	[REDACTED]	[REDACTED]
Hunter Total		[REDACTED]	[REDACTED]	[REDACTED]
Huntington	Wolverine ¹	[REDACTED]	[REDACTED]	[REDACTED]
Jim Bridger	Bridger	[REDACTED]	[REDACTED]	[REDACTED]
Jim Bridger Total		[REDACTED]	[REDACTED]	[REDACTED]
Naughton	Kemmerer	[REDACTED]	[REDACTED]	[REDACTED]
Wyodak	Wyodak	[REDACTED]	[REDACTED]	[REDACTED]

Notes

1. As described in testimony, force majeure claim by supplier has impacted contractual minimum. Forecast numbers provided are from 2025 TAM initial filing.