

Exhibit No. MGW-1T  
Docket UE-230482  
Witness: Michael G. Wilding

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba  
PACIFIC POWER & LIGHT COMPANY

Respondent.

Docket UE-230482

**PACIFICORP**

**REBUTTAL TESTIMONY OF MICHAEL G. WILDING**

**May 2024**

**TABLE OF CONTENTS**

I. INTRODUCTION AND QUALIFICATIONS ..... 1

II. PURPOSE OF TESTIMONY..... 1

III. DESCRIPTION OF PACIFICORP, COST ALLOCATION, AND COMPANY  
INVESTMENTS..... 2

IV. RESPONSE TO PUBLIC COUNSEL..... 13

V. RESPONSE TO AWEC ..... 19

X. CONCLUSION..... 20

1                                   **I.       INTRODUCTION AND QUALIFICATIONS**

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

4   A.    My name is Michael G. Wilding and my business address is 825 NE Multnomah  
5       Street, Suite 2000, Portland, Oregon 97232. My title is Vice President, Energy Supply  
6       Management (ESM).

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

8   A.    I received a Master of Accounting from Weber State University and a Bachelor of  
9       Science degree in accounting from Utah State University. As Vice President of ESM,  
10       my responsibilities include directing PacifiCorp’s front office organization in  
11       commercial and trading activities. ESM is responsible for commercially managing  
12       PacifiCorp’s diverse generation portfolio. This includes the electric and natural gas  
13       hedging, term and day-ahead trading, real-time trading, and system balancing. I also  
14       oversee the Company’s regulatory net power costs (NPC) filings and its  
15       environmental reporting. Before assuming my current position in February 2021,  
16       I worked on various regulatory projects including general rate cases, the multi-state  
17       process, and NPC filings. I have been employed by PacifiCorp since 2014.

18                                   **II.       PURPOSE OF TESTIMONY**

19   **Q.     What is the purpose of your testimony in this case?**

20   A.    The purpose of my testimony is to provide some background and context on the  
21       actions that the Company has taken to procure resources and provide low-cost service  
22       to its customers. Additionally, I respond to the misguided criticisms from the  
23       Washington State Office of the Attorney General Public Counsel Unit (Public

1 Counsel) and the Alliance of Western Energy Consumers (AWEC) that the Company  
2 has not been investing in resources to serve Washington customers.

3 **Q. Please summarize the recommendations in your testimony.**

4 A. I recommend the Commission reject the recommendations from Public Counsel and  
5 AWEC as lacking any evidentiary basis and inconsistent with the actual actions the  
6 Company has taken to maintain low rates for customers.

7 **Q. Are there any other witnesses from PacifiCorp providing testimony?**

8 A. Yes, there are three other witnesses providing testimony in this proceeding:

- 9 • Company Witness Ramon J. Mitchell provides additional information on how  
10 the Washington Inter-Jurisdictional Allocation Methodology (WIJAM)  
11 balancing adjustment hedges for Washington customers and addresses the  
12 concerns of Staff of the Washington Utilities and Transportation Commission  
13 (Staff) regarding the Company's dispatch of its natural gas facilities;
- 14 • Company Witness Douglas R. Staples explains the Company's hedging  
15 practices and identifies the flaws and mischaracterizations in AWEC's  
16 testimony and recommendations;
- 17 • Finally, Company Witness John M. Fritz explains the Company's hedging and  
18 risk policies and responds to the recommendations from Staff on the  
19 Company's hedging policies.

20 **III. DESCRIPTION OF PACIFICORP, COST ALLOCATION,**  
21 **AND COMPANY INVESTMENTS**

22 **Q. Why are you providing background on PacifiCorp's system and the history**  
23 **behind its allocation methodology?**

24 A. This information provides important context into how PacifiCorp operates its system,

1           how cost allocation for Washington customers has changed over time, and how the  
2           Company has developed and added resources for customers over the past few years.

3   **Q.    Please describe PacifiCorp’s system operations.**

4   A.    PacifiCorp has operated its system on an integrated basis across its six-state territory  
5           since the Commission approved the merger of PacifiCorp and Utah Power and Light  
6           Company, finding that the merger benefits, including reducing system operating costs  
7           through the integrated economic dispatch of generation; reducing system reserve  
8           requirements and improving system reliability, were uncontradicted.<sup>1</sup> The Company’s  
9           resource mix continues to be very diverse with hydro, wind, solar, coal, natural gas,  
10          and geothermal generation used to meet its peak demand of over 12,500 megawatts  
11          (MW). In addition, PacifiCorp has over 170 interconnections with other balancing  
12          authority areas (BAAs) and transmission operators, including the California  
13          Independent System Operator (CAISO). For system balancing purposes, PacifiCorp  
14          relies on regional energy market hubs for wholesale energy transactions.

15                 PacifiCorp currently has 1,600 MW of transmission rights, east to west,  
16                 connecting its PacifiCorp East (PACE) and PacifiCorp West (PACW) BAAs. This  
17                 includes 510 MW of Idaho Power Company transmission and 1,090 MW of  
18                 PacifiCorp transmission. These transmission rights have allowed PacifiCorp to serve  
19                 load in PACW without building additional resources in PACW. They also allow  
20                 PacifiCorp to maintain reserves on its PACE generation resources, rather than  
21                 duplicate reserve obligations in both BAAs, reducing total system operational costs.  
22                 Further, PACE provides the blackstart capability required for both BAAs.

---

<sup>1</sup> *Re PacifiCorp Maine*, Docket No. U-87-1338-AT, Second Supplemental Order at 13 (Jul. 15, 1988).

1           PacifiCorp’s geographic footprint allows it to take advantage of efficiencies  
2           and economies from both a planning and operational perspective due to retail load  
3           characteristics, variable resource diversity, and wholesale power market  
4           opportunities. This diversity of load and variable resources is effectuated through the  
5           network of transmission capability and PacifiCorp’s ability to deliver its PACE  
6           resources to PACW for both energy and ancillary services.

7           Due to the diversity of its dispatchable resource fuel mix across its BAAs,  
8           PacifiCorp is able to effectively manage price exposure to natural gas spikes, as well  
9           as market fluctuations that may be due to low hydro years or low periods of variable  
10          resource generation. This type of diversity benefit is only available through the  
11          management of both BAAs on an integrated basis. PacifiCorp has an extensive  
12          transmission capability throughout its service territory. Additionally, the introduction  
13          of the Energy Imbalance Market (EIM) and the capability to wheel power through the  
14          CAISO from PACE provides PacifiCorp the ability to improve its intra-hour delivery  
15          of energy from the east to the west. As the EIM has grown and provided a significant  
16          benefit to customers, it has also provided PacifiCorp the ability to enhance the  
17          integration of its system across both BAAs due to the enhanced dispatch on a five-  
18          minute basis, and, more importantly, due to the availability of additional transmission  
19          capability. PACE has been an integral part of providing EIM benefits to Washington  
20          customers in its ability to decrement its coal fleet and receive imports from CAISO  
21          during times in the day when solar production is high in California. These imports  
22          from California carry the additional benefit of offsetting coal emissions and allow the  
23          Company to meet its load using low cost renewable generation. During the spring

1 time, when California is more likely to be in over-supply conditions due to lower  
2 loads across the state, PacifiCorp's hydro facilities are less able to decrement to  
3 receive the low-priced imports due to stream flow management at the facilities.  
4 PACE, with its large operating range across the coal fleet, contains nimble resources  
5 that are able to decrement to very low operating levels to maximize the amount of  
6 renewable generation that can be allowed on the system, both internally and  
7 externally through the EIM. The benefit of importing low cost power through the  
8 EIM is a direct benefit to Washington customers through lower NPC, as well as the  
9 environmental benefit of displacing the thermal emissions.

10 **Q. What was the West Control Area Inter-Jurisdictional Allocation Methodology**  
11 **(WCA)?**

12 A. The WCA was the inter-jurisdictional cost allocation methodology adopted by the  
13 Washington Utilities and Transportation Commission (Commission) in 2006 to  
14 allocate costs and benefits of PacifiCorp's system to Washington.

15 The WCA isolated the costs and revenues associated with assets electrically  
16 interconnected to PacifiCorp's West Balancing Authority Area (PACW), and  
17 allocated to Washington a proportionate share of the costs and benefits based  
18 primarily on Washington's relative contribution to demand and energy requirements  
19 within PACW. The WCA included loads, generation and transmission assets, and  
20 wholesale contracts for facilities located in California, Oregon, and Washington. It  
21 also included transmission and generation assets located outside of California,  
22 Oregon, and Washington that are electrically interconnected to PACW, such as the  
23 Jim Bridger coal plant, which is physically located in PacifiCorp's East Balance

1 Authority Area (PACE). The WCA excluded all loads and assets located within  
2 PACE with the exception of the Jim Bridger Units 1-4 (Jim Bridger) and the  
3 associated transmission facilities.

4 **Q. Did the WCA require the Company to rely on a higher amount of market**  
5 **purchases to reflect the fact that east side generation assets were not allocated to**  
6 **Washington customers?**

7 A. Yes, when approving the WCA, the Commission noted that the “WCA must meet a  
8 higher proportion of its retail load with market purchases” than the east control  
9 area.”<sup>2</sup>

10 **Q. Did PacifiCorp seek approval of changes to the WCA?**

11 A. Yes. The Company sought approval of the WIJAM as part of the 2020 PacifiCorp  
12 Inter-Jurisdictional Allocation Protocol (2020 Protocol) in its general rate case in  
13 docket UE-191024.

14 **Q. Did PacifiCorp work collaboratively with Washington stakeholders to develop**  
15 **the WIJAM?**

16 A. Yes, as an outgrowth of the Multi-State Process (MSP) discussions, in the spring of  
17 2018, PacifiCorp and Staff began to specifically discuss a new cost allocation  
18 methodology. The Company worked collaboratively with Staff through various  
19 workshops, MSP meetings, and settlement negotiations to develop the WIJAM.  
20 Additionally, Staff spent considerable time reviewing data provided by PacifiCorp,  
21 visiting PacifiCorp’s trading floor and transmission control center, and analyzing the  
22 operation of PacifiCorp’s system. As the WIJAM took shape, Public Counsel and

---

<sup>2</sup> *WUTC v. Pacific Power & Light Co.*, Docket No. UE-061546 et al., Order No. 08 at ¶ 50 (Jun. 21, 2007).



1 Packaging Corporation of America (PCA) joined the discussions around the WIJAM.

2 **Q. Did Staff, Public Counsel, and PCA support the WIJAM?**

3 A. Yes. PacifiCorp, Staff, Public Counsel, and PCA all signed the WIJAM  
4 Memorandum of Understanding.

5 **Q. Please describe the WIJAM.**

6 A. As previously described in Company Witness Mitchell's testimony, the WIJAM has  
7 four primary components:

- 8 • Costs and benefits associated with PacifiCorp's entire transmission  
9 system will use a system allocation.
- 10 • Costs and benefits associated with PacifiCorp's existing and new  
11 non-emitting, non-qualifying facility (QF) resources will use a  
12 system allocation. Non-emitting, non-QF resources include all  
13 wind, solar, hydro, and geothermal generating resources.
- 14 • NPC will be allocated using a spreadsheet method that reflects  
15 assets included in Washington rates, including the allocation of  
16 EIM benefits.

17 **Q. Did the move from the WCA to the WIJAM provide access to all the new  
18 investments that PacifiCorp was making?**

19 A. Yes, the move from the WCA to the WIJAM brought in a significant amount of new  
20 wind and transmission to Washington customers.<sup>3</sup>

21 **Q. Since 2020, has PacifiCorp invested in additional renewable resources to serve  
22 Washington customers?**

23 A. Yes, in PacifiCorp's general rate case filed in 2020 and the general rate case filed in

---

<sup>3</sup> “[T]he Parties identify the direct and indirect benefits to Washington customers from the WIJAM compared to the WCA methodology: increased NPC benefits, greater benefits for its compliance with Washington’s renewable portfolio standard (RPS), greater flexibility for compliance with CETA, increased PTCs, increased wheeling revenues, and increased system diversity.” *WUTC v. PacifiCorp*, Docket No. UE-191024, Order No. 09/07/12 at ¶98 (Dec. 14, 2020).

1 2023, the Company added significant new resources and transmission. The 2020  
2 general rate case included the Energy Vision 2020 projects and transmission. The  
3 2023 general rate cases includes the Rock Creek, Rock River I, Foote Creek II-IV and  
4 Gateway South and Gateway West transmission projects over the course of the multi-  
5 year rate plan. These projects represent billions of dollars of investment in resources  
6 to serve Washington customers.

7 **Q. Please describe Energy Vision 2020's wind investments.**

8 A. PacifiCorp added 1,150 MW of new wind resources in Wyoming. These resources are  
9 three facilities built by the Company, the 500 MW TB Flats I and II facilities and the  
10 250 MW Ekola Flats project, and one facility that is a combined build-own transfer  
11 and purchase power agreement, the 400 MW Cedar Springs facility.

12 **Q. Please describe Energy Vision 2020's new transmission investments.**

13 A. PacifiCorp built a new, 140-mile Gateway West transmission segment—the 500 kV  
14 Aeolus-to-Bridger/Anticline transmission line, plus network upgrades—in Wyoming  
15 to enable the new Energy Vision 2020 wind generation.

16 **Q. Please describe the Gateway South and Gateway West Segment D.1 transmission  
17 projects that were included in the 2023 GRC.**

18 A. Gateway South is a 414-mile, high voltage 500-kilovolt (kV) transmission line that  
19 will connect southeastern Wyoming to the Company's transmission system in central  
20 Utah. Gateway West Segment D.1 includes the construction of a new 59-mile, high  
21 voltage 230-kV transmission line from the Shirley Basin substation in southeastern  
22 Wyoming to the Windstar substation near Glenrock, Wyoming, and a rebuild of  
23 approximately 57 miles of the existing Dave Johnston–Shirley Basin 230-kV

1 transmission line. The Gateway South and Gateway West Segment D.1 transmission  
2 projects provide a number of benefits including relieving congestion on the  
3 transmission system in Wyoming, enabling additional renewable resource  
4 interconnections, and improving overall reliability, all to the benefit of Washington  
5 customers.

6 **Q. Please describe the Rock Creek I and II wind projects.**

7 A. The Rock Creek I and II wind projects have a total name plate capacity of 590 MW  
8 and are located in Carbon and Albany counties in southeast Wyoming. The projects  
9 were developed by Invenergy and came from a bid submitted and selected to the final  
10 shortlist in the Company's 2020 All-Source Request for Proposal process in the form  
11 of build-transfer agreements.

12 **Q. Please describe the Foote Creek II-IV and Rock River I repowering projects.**

13 A. These projects involved the acquisition of these projects and upgrading the wind  
14 turbine generator (WTG) equipment of these wind facilities to increase the power  
15 generation from the facility and extend the life of the facility. The Foote Creek II-IV  
16 project, located in Wyoming, involved the acquisition of the project and installing  
17 new WTGs to replace the older wind turbines of much smaller capacity that were  
18 previously at the site. Similarly, the Rock River I acquire and repowering project, also  
19 located in Wyoming, acquired the resource and erected new WTGs to replace the  
20 smaller capacity turbines originally installed.

1 **Q. Can you identify the amount of renewable generation that the Company has**  
2 **added since 2020 and the associated MWh that have been allocated to**  
3 **Washington customers?**

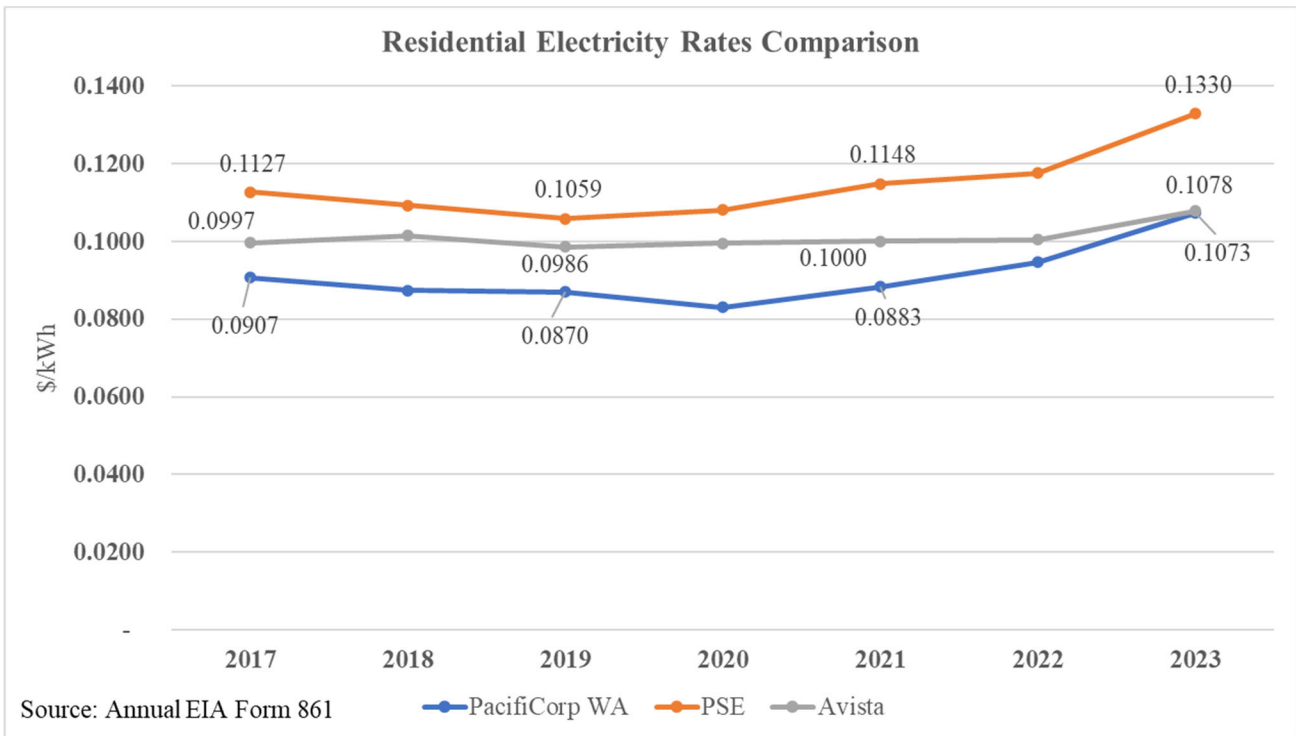
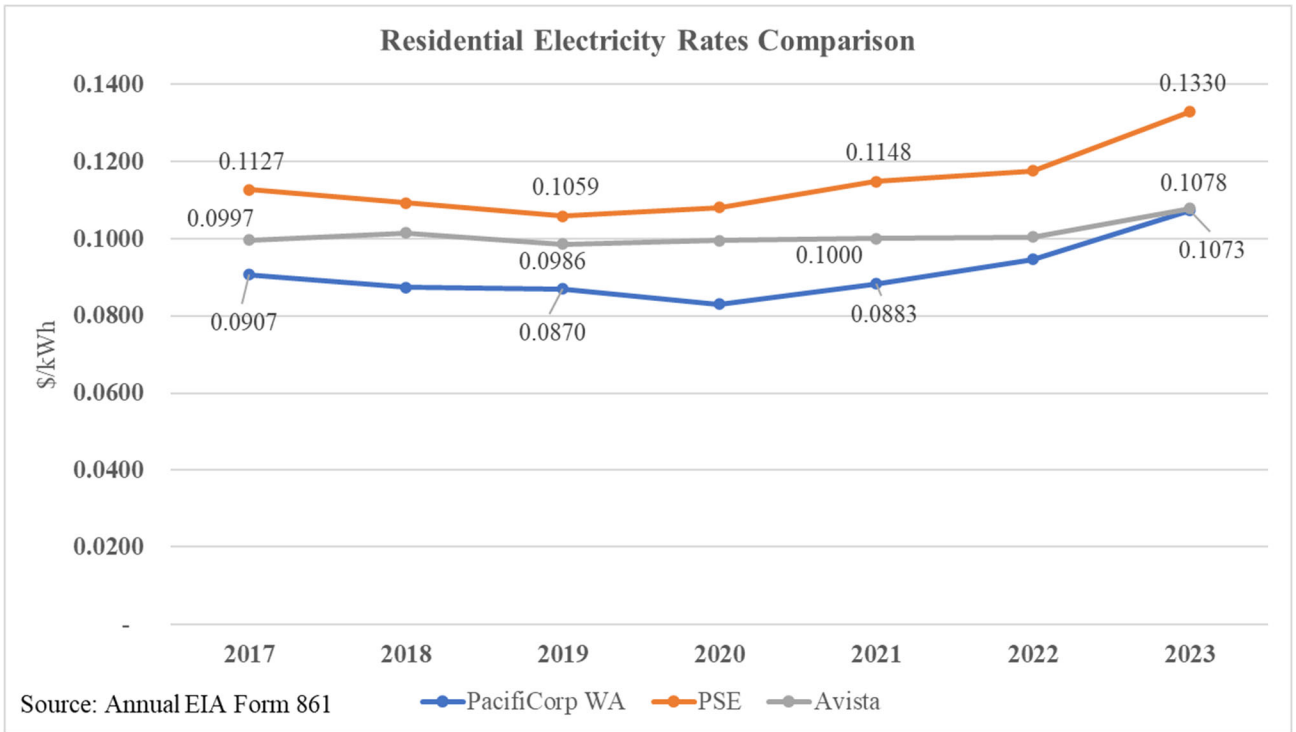
4 A. Yes, as shown in the table below, the new resources added by PacifiCorp since 2020  
5 have resulted in 329,418 MWh (or an over 7 percent increase) of additional wind  
6 generation for Washington customers than would have been previously available in  
7 2020.<sup>4</sup> Additionally, this table below includes only the wind generation that was  
8 online for the 2022 PCAM period; it does not include the additional wind generation  
9 that will be coming online during the recently approved multi-year rate plan for  
10 PacifiCorp.

---

<sup>4</sup> Source Data for this table is available in the initial filing workpapers of Company witness Jack Painter.

<b>2022 Actual Wind Generation</b>		
	<b>2022 Wind Generation from Resources currently in Washington Rates</b>	<b>2022 Wind Generation from resources that were in Washington rates in 2020</b>
	<b>Total Generation (MWh)</b>	<b>Total Generation (MWh)</b>
Glenrock I	328,535	
Glenrock III	123,123	
Goodnoe Hills	265,804	265,804
High Plains	383,965	
Leaning Juniper	253,408	253,408
Marengo I	391,503	391,503
Marengo II	196,630	196,630
McFadden Ridge	115,716	
Dunlap	469,881	
Foote Creek I	208,749	
Pryor Mountain Wind	814,117	
Rolling Hills	286,356	
Seven Mile Hill I	413,081	
Seven Mile Hill II	86,843	
Cedar Springs II Wind	603,521	
Ekola Flats Wind	805,728	
TB Flats Wind	1,488,986	
Total MWh Production	7,235,946	1,107,345
WA Allocation Factor	7.97%	22.31%
<b>Total Wind MWh Production allocated to WA</b>	576,422	247,004
<b>Wind Generation as a Percentage of WA Load</b>	12.41%	5.32%

- 1 **Q. Please describe how PacifiCorp’s rates compare to the other investor-owned**  
2 **utilities in Washington.**
- 3 A. As shown in the charts below, PacifiCorp’s electricity rates are relatively consistent  
4 with, if not lower than, the rates that Washington customers pay when they are served  
5 by other investor-owned utilities.



1 **Q. So based on this information, has PacifiCorp been able to add a significant**  
2 **amount of renewable generation while maintaining rates that are relatively**  
3 **consistent with other Washington investor-owned utilities?**

4 A. Yes.

5 **IV. RESPONSE TO PUBLIC COUNSEL**

6 **Q. Public Counsel witness Earle states that PacifiCorp has “done nothing to**  
7 **specifically address Washington customers’ market overexposure.”<sup>5</sup> How do you**  
8 **respond to that criticism?**

9 A. This criticism is inaccurate and does not reflect the significant investments that the  
10 Company has made over the same period referenced by Public Counsel witness Earle.  
11 As I discussed above, PacifiCorp has added significant new renewable generation  
12 while maintaining relatively consistent and low rates for customers. Notably, Public  
13 Counsel witness Earle has provided no evidence that the acquisition of some resource  
14 would have reduced costs for Washington customers.

15 **Q. Public Counsel witness Earle states that PacifiCorp has acted imprudently with**  
16 **respect to Washington ratepayers in its long-term resource planning.<sup>6</sup> He**  
17 **additionally cites the Commission’s warnings from the 2011, 2015, and 2017**  
18 **Integrated Resource Plans (IRP). How do you respond?**

19 A. The testimony of Public Counsel witness Earle raises a number of concerns. First, as I  
20 described in detail above, PacifiCorp has taken steps to acquire a significant amount  
21 of renewable resources, transmission, and modify its cost allocation methodology to  
22 provide additional generation for Washington customers and reduce the reliance on

---

<sup>5</sup> Public Counsel Witness Earle, Exh. RLE-1T at 6 (Mar. 28, 2024).

<sup>6</sup> Exh. RLE-1T at 9.

1 market purchases. Public Counsel witness Earle makes generalized statements  
2 without a thoughtful, or factual, assessment of PacifiCorp's actual resource additions  
3 or the risk that the addition of state-specific resources would pose to system  
4 operations. Indeed, Public Counsel witness Earle provided no assessment of whether  
5 a resource acquisition solely borne by PacifiCorp's Washington customers would  
6 have compared to market prices in the referenced time periods when decisions would  
7 have had to been made. Instead, Public Counsel witness Earle asserts that the  
8 Company is to blame for a failure to plan and the Commission should disallow all net  
9 power costs from 2022. These arguments do nothing to help the Commission develop  
10 a record on which to base a reasoned decision, let alone a decision so punitive.

11 As described in the testimony of Company witnesses Mitchell and Staples,  
12 PacifiCorp, under the WIJAM, serves Washington customers additional energy at  
13 prevailing power hedge prices, which remedies what would have otherwise been spot  
14 market exposure, which is a cost-effective way to account for the provision of electric  
15 service to Washington customers.<sup>7</sup> This is supported by the fact that PacifiCorp has  
16 had low \$/kWh rates that are consistently comparable to the other investor-owned  
17 utilities in Washington.

18 **Q. Public Counsel witness Earle claims that PacifiCorp has provided no evidence**  
19 **that Company decisions prior to 2023 were prudent in long-term planning with**  
20 **regards to the exposure of Washington Customers to market prices.”<sup>8</sup> How do**  
21 **you respond?**

22 A. It has always been understood that by not acknowledging the existence of the east

---

<sup>7</sup> Exh. RJM-1T at 11.

<sup>8</sup> Exh. RLE-1T at 9-10.



1 side of PacifiCorp's system, the WCA would expose Washington customers to more  
2 market pressures.<sup>9</sup> However, PacifiCorp has taken steps to remedy this issue, by  
3 working with parties to develop the WIJAM, which immediately provided benefits  
4 from *all* the Company's non-emitting resources and greater market benefits.  
5 Washington customers were able to benefit from access to the best geographic  
6 locations for that renewable generation and the billions of dollars that the Company  
7 has spent on building and accessing those resources. However, building or acquiring  
8 new resources alone is not going to solve a market exposure issue given  
9 Washington's recent energy policies and the need to plan for new types of resources.

10 PacifiCorp is not making more market purchases because of Washington's  
11 cost allocation; Washington is being allocated an estimated cost of hedged market  
12 purchases to account for the difference between system operations (the system being  
13 adequately served) and an approved cost allocation methodology.

14 **Q. Do you agree with Public Counsel Witness Earle's contention that PacifiCorp is**  
15 **claiming that it is helpless to address Washington Customers' market**  
16 **overexposure?<sup>10</sup>**

17 A. No. As I note in detail above, PacifiCorp has enacted new cost allocation  
18 methodologies and added significant new resources to address this. Additionally,  
19 PacifiCorp agrees with Public Counsel Witness Earle's contention that the WIJAM  
20 does not prevent the acquisition of new resources.<sup>11</sup> It does quite the opposite, it has  
21 enabled the addition of significant new resources for the benefit of Washington

---

<sup>9</sup> Docket No. UE-061546 et al., Order No. 08 at ¶ 50.

<sup>10</sup> Exh. RLE-1T at 10-11.

<sup>11</sup> Exh. RLE-1T at 11-12.

1 customers. PacifiCorp continues to work on approaches to alleviate these issues, but  
2 efforts to collaborate are often met with the same approach presented by Public  
3 Counsel witness Earle (*i.e.*, generalized statements that ignore prior regulatory  
4 decisions, seek to create a punitive regulatory environment, and lack constructive  
5 engagement).

6 **Q. Public Counsel Witness Earle contends that PacifiCorp has not established what  
7 level of market exposure is appropriate. How do you respond?**

8 A. PacifiCorp has provided testimony from Company witness Staples and Mitchell on  
9 how the Company hedges for market exposure based on the resource mix that the  
10 Company currently has. Additionally, I have provided testimony on how the  
11 Company has worked to modify cost allocation methodologies and invested billions  
12 in renewable resources to meet the needs of Washington customers. Public Counsel  
13 witness Earle has provided no evidence that the Company should have taken other  
14 actions, acquired different resources, or that any of those actions would have resulted  
15 in lower rates for Washington customers.

16 **Q. Public Counsel witness Earle states PacifiCorp's other customers are  
17 underexposed to market because of Washington's overexposure.<sup>12</sup> How do you  
18 respond?**

19 A. First of all, as discussed in the testimony of Company witness Mitchell, customers in  
20 PacifiCorp's other jurisdictions are not underexposed to markets as compared to  
21 Washington customers. Not only does Public Counsel witness Earle provide no  
22 support for this thesis, but the evidence is also entirely to the contrary. PacifiCorp's

---

<sup>12</sup> Exh. RLE-1T at 12.

1 entire system maintains an open position to make market purchases as part of a least-  
2 cost least risk solution to serve customers. However, the explanation is much simpler,  
3 market prices have risen for everyone and that means it costs more to serve customers  
4 everywhere.

5 Washington customers may have a larger amount of *allocated* market  
6 purchases, inclusive of hedges, that are calculated to account for the removal of east-  
7 side thermal generation from the cost-allocation methodology. However, as noted  
8 above, the Company has been acquiring a significant amount of renewable generation  
9 to work towards closing that position while also balancing the rate impacts on  
10 Washington customers and to avoid overbuilding the system.

11 **Q. Public Counsel Witness Earle contends that the 2023 IRP provides no hope that**  
12 **the Company will resolve Washington’s market overexposure going forward.<sup>13</sup>**  
13 **How do you respond?**

14 A. It is not the role of the IRP process to mitigate a specific market exposure, it is to find  
15 the least cost, least risk resource mix for serving customers, and that has always  
16 included market purchases.

17 **Q. Public Counsel witness Earle recommends disallowance of the entire PCAM**  
18 **balance.<sup>14</sup> Is this a reasonable adjustment?**

19 A. No, this is a ridiculous adjustment that is not supported by the Company’s history of  
20 prudently managing costs, acquiring resources, and working to avoid detrimental rate  
21 impacts on Washington customers as described above. Additionally, PacifiCorp’s  
22 earned ROE was 0.81% in 2022 and -7.30% in 2023. This means that in 2022 and

---

<sup>13</sup> Exh. RLE 1T at 13.

<sup>14</sup> Exh. RLE-1T at 4.

1 2023, PacifiCorp did not recover the costs of providing electricity to its customers in  
2 rates. To the extent that PacifiCorp is denied the prudent costs of operating its system  
3 for Washington customers, it will impact the ability of the Company to access the  
4 debt markets and cost-effectively make future investments for customers.

5 **Q. Public Counsel witness Earle recommends that PacifiCorp should hedge for**  
6 **Washington customers separately or require an independent third-party to do so**  
7 **at shareholder expense.<sup>15</sup> Is this a reasonable recommendation?**

8 A. No. As discussed in depth in the testimonies of Company witness Mitchell, Company  
9 witness Staples, and Staff witness Yeomans, PacifiCorp’s “energy risk management  
10 policy is prudent, reasonable, and effective.”<sup>16</sup> This recommendation is simply  
11 unfounded.

12 **Q. Public Counsel witness Earle recommends that PacifiCorp should reform its IRP**  
13 **process so that it optimizes on behalf of Washington ratepayers.<sup>17</sup> Is this an**  
14 **appropriate recommendation.**

15 A. No. This recommendation raises several concerns. First, the Commission should not  
16 address planning issues in this proceeding. The record has not been adequately  
17 developed and the Commission has appropriately refrained from making significant  
18 policy directives without a thorough record and thoughtful evaluation. Second,  
19 PacifiCorp operates as a single system and therefore plans as a single system.  
20 Washington already has significant other avenues to address the Company’s resource  
21 planning process. PacifiCorp’s planning efforts are, necessarily, evolving to address

---

<sup>15</sup> Exh. RLE-1T at 4.

<sup>16</sup> Staff Witness Yeomans, Exh. WY-1CT at 5 (Mar. 28, 2024).

<sup>17</sup> Exh. RLE-1T at 4.

1 changing state energy policies given the complex operational environment facing  
2 utilities. However, Public Counsel witness Earle’s recommendations fail to recognize  
3 the reality of utility operations, or how planning for customers in PacifiCorp’s  
4 Washington service area in isolation may impact rates. The Commission should  
5 develop a record that explores the risk to PacifiCorp’s Washington customers before  
6 taking any actions such as those recommended by Public Counsel witness Earle.

7 **V. RESPONSE TO AWEC**

8 **Q. Are there statements that AWEC Witness Bradley G. Mullins makes to which**  
9 **you want to respond?**

10 A. Yes. AWEC Witness Mullins makes two statements that must be called out as they  
11 have no relevance to this proceeding and are simply meant to be distract the  
12 Commission. The first is a reference to future procurement. The second is a reference  
13 to the Berkshire Hathaway, Inc. annual shareholder letter.

14 **Q. AWEC Witness Mullins claims that PacifiCorp has suspended its 2023 All**  
15 **Source RFP, and this will harm Washington’s short position.<sup>18</sup> Does this have**  
16 **any relevance to 2022 net power costs?**

17 A. None whatsoever. AWEC’s argument does not apply to the prudence of the  
18 Company’s past decision. The 2023 All Source RFP has no impact on the Company’s  
19 power costs in 2022. Any resources that would have been acquired through that RFP  
20 would not have been in service until 2026 or beyond. AWEC Witness Mullins is well  
21 aware of the time required for resource development, evaluation, financing,  
22 interconnection, and construction.

---

<sup>18</sup> AWEC Witness Mullins, Exh. BGM-1CT at 4-5 (Mar. 28, 2024).

1 **Q. AWEC Witness Mullins additionally cites Warren Buffet’s recent statement in**  
2 **the shareholder letter and cites it as a basis to disallow the entire PCAM balance**  
3 **on the basis “that PacifiCorp has not found it desirable to invest in**  
4 **Washington’s Portfolio.”<sup>19</sup> How do you respond?**

5 A. First of all, the notion that PacifiCorp has not found it “desirable” to invest in  
6 Washington’s portfolio is patently false. As I discussed in detail above, PacifiCorp  
7 has invested billions of dollars in renewable generation and transmission to serve  
8 Washington customers. Secondly, attempting to conflate a broad statement from  
9 Warren Buffet about the difficulties that wildfires cause for investments in utilities  
10 across the western United States into a disallowance in a specific proceeding is  
11 inappropriate and simply unsupportable.

12 **X. CONCLUSION**

13 **Q. Please summarize your recommendations to the Commission.**

14 A. I recommend that the Commission reject the recommendations and adjustments  
15 proposed by AWEC and Public Counsel as unfounded and allow the Company  
16 recovery of the PCAM balance as recommended by the Company.

17 **Q. Does this conclude your rebuttal testimony?**

18 A. Yes.

---

<sup>19</sup> Exh. BGM-1CT at 5.