

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UE 375

In the Matter of

PACIFICORP, dba PACIFIC POWER,

2021 Transition Adjustment Mechanism.

BENCH REQUEST

The below questions are directed to PacifiCorp, dba Pacific Power. PacifiCorp is directed to file responses to the questions by close of business on Monday, August 17, 2020. If any parties have a response, it may be filed by close of business on Monday, August 24, 2020. The questions are being distributed as a bench request due to the cancellation of the hearing which would have involved Commissioner and ALJ examination of the detailed testimony in the record. Additional questions may be issued after receipt of the parties' stipulation and supporting testimony.

- (1) Please address the maintenance at Colstrip Unit 4 in early 2021 referenced in PacifiCorp's General Rate Case Stipulation filed with the Washington Utilities and Transportation Commission on July 20, 2020 (page 8).
 - a. Will this maintenance work result in an outage of Colstrip 4 in 2021, and if so, how long is the outage expected to be?
 - b. Please explain whether and how the 2021 Net Power Cost (NPC) forecast reflects a 2021 outage at Colstrip 4.
 - i. Will an outage cause PacifiCorp to accept a lower coal delivery amount than what is shown at PAC/700, Ralston/15?
 - ii. If yes, please provide an updated forecast delivery level and compare that level to the previous two years' forecast level.
 - iii. If PacifiCorp will incur additional costs for a delivery level under its minimum delivery level, due to an outage, please provide those estimated costs.
 - iv. Please explain whether the maintenance is a force majeure event referenced in PacifiCorp's June 29, 2020 response to ALJ Bench Request 2.2.
- (2) In light of PacifiCorp's statement that coal nominations occur in the summer of 2020, please provide the most updated delivery levels by showing changes to PAC/700, Ralston/15 or Sierra Club Exhibit 108.
 - a. Will updated nomination levels impact the GRID runs and the NPC forecast?

- b. Are delivery levels subject to a further update in the NPC Indicative/Final update?
- (3) PacifiCorp's reply update states that lower coal volumes decrease fuel expense by \$11.4 million.
- a. Please explain which plants have lower volumes by connecting the cost decreases to the delivery volumes shown in PAC/700, Ralston/15.
 - b. PacifiCorp's reply update states that it was able to defer some Black Butte coal delivery from 2021 to 2022. Please explain what it means to defer this delivery. For example will the deferred tonnage be additive to the normal 2022 delivery?
 - c. PacifiCorp states that GRID dispatches up the coal plants to meet their minimum take levels, "to ensure those contractual provisions are respected." PAC/500, Webb/49. Please explain whether shortfall payments (minimum take penalties or liquidated damages) are only visible in the PCAM due to this modeling. Alternatively, please explain if there are shortfall payments included in the 2021 NPC forecast beyond the environmental shortfall payment for Naughton.
- (4) Please address how PacifiCorp manages the annual minimum take deliveries from Wolverine for the Huntington plant.
- a. Please describe the amount of the 2021 delivery that is forecast to be stored as inventory for later use. Please compare this amount with the amount that was stored last year, and the current space available for storage.
 - b. Does the Wolverine contract allow PacifiCorp to refuse delivery and instead make a shortfall payment?
 - i. What is the cost associated with refusing delivery under the Wolverine CSA?
 - ii. Could a shortfall penalty at Huntington be mitigated by using the coal at a different plant or selling the coal?

Dated this 31st day of July, 2020 at Salem, Oregon.



Sarah Rowe
Administrative Law Judge