

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UE 390

In the Matter of

PACIFICORP, dba PACIFIC POWER,  
2022 Transition Adjustment Mechanism.

BENCH REQUEST

The below bench request questions are intended to clarify the record discussed in the August 26, 2021 evidentiary hearing. PacifiCorp is asked to respond to this bench request within seven days of its issuance. Any stakeholder may file a response seven days thereafter.

1. Update to the “Contract Minimums” Table from UE 375:

Please provide a current version of the “Contract Minimum” table from UE 375 showing current forecast delivery levels for PacifiCorp’s share of coal plants. *See* UE 375, PAC/700, Ralston/15; PacifiCorp Response to ALJ Bench Request 3.2.

**Confidential Table 2: Contract Minimums – Coal Supply Agreements**

Plant	Coal Mine	Minimum Deliveries	Forecast Deliveries	Minimum %
Colstrip	Rosebud			
Craig	Trapper			
Dave Johnston	Coal Creek			
Dave Johnston	Caballo			
Dave Johnston Total				
Hayden	Twentymile			
Hunter	Unknown			
Huntington	Various			
Jim Bridger	Black Butte			
Jim Bridger	Bridger			
Jim Bridger Total				
Naughton	Kemmerer			
Wyodak	Wyodak			

Note: Deliveries are in tons and represent PacifiCorp share

2. Convert Information on Past Hunter Consumption to PacifiCorp’s Share:

Please explain how the Hunter Coal Supply Agreement (CSA) minimum deliveries compare to the last five years of historic deliveries, on a PacifiCorp-share basis. This is further detail on the average plant-wide information provided at PAC/500, Schwartz/35-36.

3. Convert Information on Hunter’s Alternative Tonnage to PacifiCorp’s Share:

Please provide the alternative tonnage levels on a PacifiCorp-share basis that were identified when PacifiCorp prepared high and low coal volume sensitivities. Include levels identified for years beyond 2022 if available. *See* PAC/700, MacNeil/2-5.

4. Additional Details on Changes in Net Power Costs (NPC) from the NPC Baseline: PAC/400, Staples/49 states “the proposed change in market caps in the 2022 TAM provides a more plausible driver to reduced coal generation.” To better understand PacifiCorp’s statement, please provide the following:
- a. For coal costs, please provide an updated figure for the 2022 TAM reduction in coal costs compared to the 2021 TAM (PAC/100, Webb/18 provides \$114 million total-company reduction, PAC/403, Staples/1 offsets this amount with a \$1.5 million Oregon-allocated increase).
  - b. Please explain what amount or percentage of 2022 coal cost reduction is due to the change in market caps.
  - c. For market sales, please expand the data in Figures 4 and 5 to include the Forecast Short-Term Sales (MWh) and (\$) for 2021 and 2022. *See Eratta PAC/400, Staples/23-24.*
  - d. Please identify the amount or percentage of removed sales from 2021 to 2022 that GRID models as coal-fueled.
5. Historical Modeling Information for Huntington:  
In the 2017 and 2018 TAMs, PacifiCorp explained which, if any, coal plants required adjustments to account for minimum take requirements. *See UE 307, PAC/500, Ralston/33 and UE 323, PAC/200, Ralston/15.* In the 2022 TAM, Staff/702, Anderson/5 (OPUC Data Request 66) shows that Colstrip, Hayden, and Huntington required adjustments to account for minimum take requirements. The magnitude of the adjustments are shown in Staff/702, Anderson/12-13 (OPUC Data Request 162 and 163). Please provide this type of information about Huntington’s modeling from the 2019, 2020 and 2021 TAMs:
- a. Narrative response as to whether adjustments were required in the initial 2019, 2020, or 2021 TAM filings to account for Huntington’s minimum take requirement.
  - b. If an adjustment was required, please describe the magnitude of the adjustment in MWh.
  - c. Please describe Huntington’s dispatch tier prices and costing tier prices from the 2017 TAM to the 2022 TAM.

Dated this 10<sup>th</sup> day of September, 2021, at Salem, Oregon.



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Sarah Rowe  
Administrative Law Judge