Docket No. 25-035-06

OCS Exhibit No. 1.2D

Compilation of Discovery Responses Referenced in the

Direct Testimony of Anthony Sandonato on Behalf of

The Office of Consumer Services

October 10, 2025

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OCS Data Request 2.23

Craig M. Eller Testimony Questions - Refer to page 3 lines 58-65 of your testimony.

(a) What are the certain elements of the program that the Company and the Community Renewable Energy Agency (Agency) are still unresolved?

(b) What items has the Company presented to the Commission to resolve as part of this proceeding?

Response to OCS Data Request 2.23

(a) Please refer to the direct testimony of Company witness, Mr. Craig M. Eller, pages 5-6, lines 107-114.

(b) Please refer to the direct testimony of Company witness, Mr. Craig M. Eller, page 5, lines 91-106.

OCS Data Request 5.2

Regarding Program Model - Please identify the community solar program design (e.g., Subscription Model, Ownership Model, Utility-Owned Model) that the proposed Program was modeled after or is most analogous to. Please provide a detailed comparison, highlighting the key similarities and differences.

Response to OCS Data Request 5.2

The proposed Utah Community Clean Energy Program is not modeled after any existing community solar program but is designed to meet the requirements of the Community Renewable Energy Act, U.C.A. § 54-17-901, *et seq.*, and Utah Administrative Rules R746-314.

DPU Data Request 2.3

Craig M. Eller Testimony Questions - Reference Direct Testimony of Craig Eller, pg. 3, ln. 57-60. Please describe in detail what aspects of the Program the Parties did not achieve consensus on? Do any of these issues relate to either the Governance Agreement, Utility Agreement or program model PPA(s) used to contract resource? If so, please describe and refer directly to implicated provisions.

Response to DPU Data Request 2.3

Key elements where consensus has not yet been achieved include:

(1) Treatment of start-up costs to implement the program is currently not covered in any agreement. PacifiCorp has assumed inclusion in rates to be recovered in the first year of the program from participants. A separate agreement was in draft form for recovery from the Utah Community Renewable Energy Agency (CREA) should the program fail but is yet to be agreed upon.

(2) Valuation of the resources where the Company has assumed the Company will value the resource at acquisition of the power purchase agreement (PPA) and maintain that value, both contract price and avoided costs value of the resource, over the term of the PPA.

(3) Termination provisions of the program resource PPA; PacifiCorp has assumed that the resource PPA terminates upon termination of the program.

These elements do not relate to the Governance Agreement or the Utility Agreement.

OCS Data Request 4.10

Resource & Administrative Reserve Funds - Please refer to Mr. Meredith's testimony regarding the 12.5-year resource reserve fund. In the event of Program termination by the legislature, does the Company's pro forma PPA allow the Company to terminate the PPA and retain the reserve funds, or must the funds be used to honor the PPA until exhausted?

Response to OCS Data Request 4.10

No. In the event of the termination of the Utah Community Clean Energy Program (CCEP), the balance of the 12.5-year resource reserve fund will be disbursed to respective power purchase agreement (PPA) resource owners, where the respective resource is utilized and is specifically designated to serve program participants. The Company does not retain any of the reserve fund balance should program termination occur.

Additionally, PacifiCorp also has customers on the existing Utah Tariff Schedule No. 32 and Schedule No. 34 who are responsible for termination costs either through direct agreement with the PPA resource owner and security to the provider or through security provided to PacifiCorp in support of customer requested resource procurement.

DPU Data Request 2.22

Robert M. Meredith Testimony Questions - Reference Direct Testimony Robert Meredith, page 3-4, lines 51-71 regarding the forecast assumptions, please answer the following:

(1) Is there any escalation included in the administrative costs? If so, please provide detail as to what the escalation is and how it was determined. If not, please explain why not?

(2) How close is the 5% interest rate to actual rates the company receives?

(3) Please provide some insight into the level of reasonable fluctuation that might be expected with regard to start-up costs. Would the Company be comfortable with establishing an acceptable level of bandwidth for recovery? When actual costs are determined, will details of deviations be explained if greater than a certain level?

(4) Please elaborate why the reserve balance must be achieved 1 year before the resource's commercial operation date?

(5) Please provide context for the need for 12.5 years of the cost of the PPA in excess of the avoided cost value upfront. What level of opt-out would be required in the first year of the program to make the reserve balance deplete to a level that will constitute a termination of the program resource?

(6) Please provide context for the need for 5 years of the cost of the administration upfront.

(7) Will benefits such as avoided cost value be updated annually? If so, please describe the process for annually updating the avoided costs value. Was an escalation of the avoided cost values assumed over time?

Response to DPU Data Request 2.22

(1) The forecasted administrative costs assumption that starts the calculation has been escalated to 2026 dollars. Work paper "Meredith Workpaper – Sch. 100 Forecast Model.xls" does not assume further escalation.

(2) The interest rate of five percent is comparable to the average cost of long-term debt included in the Company's recently approved general rate case (GRC), Docket No. 24-035-04.

(3) The start-up costs to be billed to the communities are subject to fluctuation of customer number changes and postage costs increases. The Company is not able to predict either component.

The start-up costs proposed to be billed to Utah Community Clean Energy Program participants through Schedule 100 are subject to fluctuations of how many customers call into the 800 number, time it takes to answer the customers' questions on the Utah Community Clean Energy Program and potential software development cost increases. The Company is not able to predict either component; the presentation in work paper "Eller Workpaper – Program Costs_URC.xlsx" are based on assumptions provided by Utah Renewable Community (URC) percentages of customer participation, and potential phone contact assumption.

No. The Company must ensure that all costs of the Utah Community Clean Energy Program are recovered from the Communities and the participants of the Utah Community Clean Energy Program. Under U.C.A. § 54-17-904(4)(b), "[t]he rates approved by the commission for participating customers… may not result in any shift of costs or benefits to any nonparticipating customer, or any other customer of the qualified utility beyond the participating community boundaries[.] To be clear, the law does not allow costs or benefits to impact non-participants or the qualified utility.

(4) Achieving the reserve balance a year before commercial operations date (COD) provides the developer with a backstop assurance that part of the resource will be paid for should the Utah Clean Energy Program fail while the resource is being constructed.

(5) The 12.5 years of resource reserve balance is an initial perspective of what a developer may require to be comfortable to execute a power purchase agreement (PPA) that will provide clean energy to participants of the Utah Clean Energy Program. The reserve level to be maintained must cover 12.5 years of value for the first 12.5 years before it is allowed to deplete below the stated level; the reserve must be replenished should the level fall below the 12.5 year of reserve required within the 12.5 years of the first year of commercial operations of the resource or termination could be triggered.

(6) The five years of administrative reserve balance is what the Company is comfortable with to ensure all Utah Clean Energy Program administrative costs are recovered should Utah Clean Energy Program fail.

(7) No. Avoided costs will be determined at the execution of the PPA and will not be updated annually.

OCS Data Request 4.11

> **Resource & Administrative Reserve Funds -** The calculation of the 12.5-year resource reserve fund appears to converse only the “Rec Value” of the PPA. Is it the Company position that if the program fails it will retain the PPA but never sell any of the Recs the PPA provides. Explain what would happen to the PPA in that event – would all customers end up paying for the energy provided by the PPA?

Response to OCS Data Request 4.11

> In the event of the termination of the Utah Community Clean Energy Program (CCEP), the Company’s position is that the developer will be compensated using the 12.5-year resource reserve fund as the power purchase agreement (PPA) will be terminated by the Company. What occurs to the resource after the PPA is terminated is for the resource owner to determine and is not for the Company to determine the future of a resource the Company does not own.

DPU Data Request 3.4

Refer to Response to DPU Data Request 2.10, please answer the following:

(1) Given that much of the program costs are to support ongoing noticing that would cease if the Program terminated, why is 5 years of all program costs needed as a backstop? Please explain, by line item according to Eller Workpaper, II – Program Costs, the stranded costs items.

(2) If the resource reserve balance was reduced to 60 months and the program reserve balance was reduced to 12 months, what would be the impact on rates in Schedule 100? Please provide for all three phases – Build-Up, Maintenance, and Draw-Down Phase.

Response to DPU Data Request 3.4

(1) Five years of program costs is needed as a backstop to ensure that should the program terminate early, the program ensures that all costs already incurred and costs necessary to wind down the program are covered by program participants and do not impact non-participating customers.
In reference to "Eller Workpaper, II-Program Costs", "Table D. Program Expenses Summary", the stranded costs items include: (7) Noticing – ongoing (12 months), which is needed to cover any termination noticing for the program to participating communities; (8) Noticing – paper exit confirmation, which includes sending out confirmation of participants' exit from the program; (10) Agency Costs, a program administrator which PacifiCorp understands the Agency intends to hire; (11) URC Program Administrator at the Utility, which will administer the program and potentially address program termination activities to wind down the program once terminated; (13) phone support – annual refresher training, which provides annual training for the call center; (14) Phone Support – ongoing, which will be utilized to address any calls from participating customers with regards to the program terminating; and (17) Escrow / trust and management fees, which will continue until all balances are disbursed to terminate the program.

(2) Please refer to Attachment DPU 3.4 which provides forecast program rates during each phase if the resource reserve balance is reduced to 60 months and the program reserve balance is reduced to 12 months.

Utah Community Clean Energy Program Rates

Application Part II.E. Projected Program Impacts for Each Customer Class by Tariff Schedule

Residential									
Schedule		kWh	Monthly Bill Amount		Monthly Bill Amount w/URC		Difference		% Impact
Sch. 1		500	$	59.63	$	60.96	$	1.33	2.2%
		675	$	86.72	$	88.51	$	1.79	2.1%
		900	$	108.13	$	110.52	$	2.39	2.2%

Non Residential									
Schedule	kW	kWh	Monthly Bill Amount		Monthly Bill Amount w/URC		Difference		% Impact
Sch. 6	50	13,140	$	1,686.92	$	1,721.83	$	34.91	2.1%
	300	91,250	$	10,410.76	$	10,653.21	$	242.45	2.3%
	1,000	356,000	$	37,004.18	$	37,950.06	$	945.88	2.6%
Sch. 8	1,000	452,600	$	42,750.96	$	43,953.50	$	1,202.54	2.8%
	1,500	860,000	$	56,940.21	$	59,225.20	$	2,284.99	4.0%
	5,825	3,394,500	$	276,328.26	$	285,347.33	$	9,019.07	3.3%
Sch. 9	1,000	452,600	$	37,027.38	$	38,229.92	$	1,202.54	3.2%
	5,500	2,489,300	$	202,228.56	$	208,842.54	$	6,613.98	3.3%
	40,825	18,104,000	$	1,486,236.96	$	1,534,338.67	$	48,101.71	3.2%
Sch. 23	5	1,752	$	209.00	$	213.66	$	4.66	2.2%
	15	4,380	$	388.00	$	399.64	$	11.64	3.0%
	30	10,220	$	969.00	$	996.15	$	27.15	2.8%

Summary of Utah Community Clean Energy Program Forecast

Phase	Year	Rate ($/kWh)	Price Premium	Incremental % Renewable	End of Year Reserve Balance
Build Up	2026	0.002657	1.2%	0.0%	$2,664,532
	2027	0.002657	2.3%	0.0%	$8,305,949
	2028	0.001585	1.4%	0.4%	$12,334,723
	2029	0.001585	1.4%	4.9%	$16,611,898
Maintenance	2030	0.000912	0.8%	5.1%	$16,619,667
	2031	0.000912	0.8%	9.4%	$16,617,494
	2032	0.000912	0.8%	9.4%	$16,619,991
	2033	0.000912	0.8%	9.4%	$16,620,717
	2034	0.000912	0.8%	9.3%	$16,619,921
	2035	0.000912	0.8%	9.3%	$16,619,085
	2036	0.000912	0.8%	9.3%	$16,618,205
	2037	0.000912	0.8%	9.2%	$16,617,281
	2038	0.000912	0.8%	9.2%	$16,616,309
	2039	0.000912	0.8%	9.2%	$16,615,287
	2040	0.000912	0.8%	9.2%	$16,614,214
	2041	0.000912	0.8%	9.2%	$16,613,085
	2042	0.000912	0.8%	9.1%	$16,611,898
Draw Down	2043	0.000315	0.3%	9.1%	$14,578,829
	2044	0.000315	0.3%	9.1%	$12,441,744
	2045	0.000315	0.3%	9.1%	$10,195,322
	2046	0.000315	0.3%	9.0%	$7,833,968
	2047	0.000315	0.3%	9.0%	$5,351,804
	2048	0.000315	0.3%	9.0%	$2,742,647
	2049	0.000315	0.3%	9.0%	$0

OCS Data Request 4.9

Program Administrative & Startup Costs - Please provide the justification and any precedent from other programs for requiring a five year administrative cost reserve fund, as opposed to the one-year reserve proposed by the Agency.

Response to OCS Data Request 4.9

The Utah Community Clean Energy Program (CCEP) is the first community clean energy program that the Company has proposed that lacks an explicit backstop provided under statute or administrative rule. The Community Clean Energy Act, however, requires that program costs and benefits do not shift to nonparticipating customers or the utility. Therefore, there is no precedent available for an administrative costs reserve fund. Other community clean energy or renewable programs for other states have had situs backstop to situs retail customers regardless of retail customers participation. In addition, with the recent passage of the 2025 Senate Bill 132 legislation in Utah, PacifiCorp is also adopting five years of security requirement for large retail loads. The five-year administrative costs reserve fund is to ensure that all costs of the program are covered by program participants should the program experience early termination. The Company cannot predict all administrative activities that follow early termination, but these could include:

- Participant notification and customer support.
- Address any required system updates due to program termination.
- Commission filings to terminate the program.
- Resource contract termination.
- Distribution of reserve funds.
- Any potential litigation that may result due to program termination.

OCS Data Request 2.20

Direct Testimony of Robert M. Meredith – Refer to "RMP Meredith Workpapers – Annual Schedule 100 Forecast Model 6-4-2025.xlsx" tab "Bill Impacts".

a. Please provide a copy of this table with all workpapers intact and for all rate schedules included in the projected participation. Please detail the impact to customers on Schedule No. 3. – Low-Income Lifeline Program.

Response to OCS Data Request 2.20

a. The Company objects to this request as unduly burdensome, requiring the creation of a new analysis, report, or preparation of study, lacking a high degree of relevance to the proceeding, and not reasonably calculated to lead to the discovery of admissible information. Subject to and without waiving the foregoing objection, the Company responds as follows:

   Schedule 3 customers would see no impact unless the CREA forecasted Schedule 100 program charge exceeded the $7 cap. It is possible that Schedule 3 customers could see increase in their utility costs due to participation in the Utah Community Clean Energy Program. Using the forecasted Schedule 100 program rates of $0.006309 per kilowatt-hour ($/kWh) and the maximum Low Income Assistance credit proposed that cannot exceed $7, a Schedule 3 customer, would need to utilize over 1,109 kWh before incurring an increase in the utility cost.

DPU Data Request 1.5

In reference to Attachment J: Description of Proposed Low-Income Programs and Assistance:

(1) Attachment J, page 1, regarding the enhanced monthly bill credit, is the surcharge paid by participating customers of not more than $0.70 applied to all customer classes or only residential? If it applies to all customer classes, please specify whether commercial classes will be subject to the same $0.70 cap, and if not, whether a different cap would apply to them.

(2) Attachment J, page 2, regarding the households listed as potentially disproportionately impacted by changes, would all these customers have their termination fees waived or only those enrolled in Schedule 3 "Low Income Lifeline Program – Residential Service?"

Response to DPU Data Request 1.5

(1) The Company believes the Community Renewable Energy Agency (CREA) intends for the $0.70 surcharge to apply to all customer classes, including commercial customers.

(2) Based on the language in the Communities Plans for Low-Income Assistance, provided as Attachment J to the Company's Application, the Company believes CREA intends for the "households who may be disproportionately affected by changes" to be targeted for the specific outreach strategies listed in the plans. However, only participating customers who receive service from the Company on Electric Service Schedule No. 3 would be eligible for the Community Clean Energy Program's low-income assistance benefits, such as the waiver of termination fees.

DPU Data Request 2.26

Robert M. Meredith Work paper Questions - The kWh charge does not seem to be unbundled in rate design (admin versus resource costs not split in the .6132 cents per kWh charge). How will the Company determine if the revenues are resource or administrative reserve revenues to determine the sufficiency of the reserve balances? Are the revenues unbundled in the Company system and not in the billing to the customer? If not unbundled, what is the rationale for two separate reserve funds?

Response to DPU Data Request 2.26

Please refer to the workpaper supporting the direct testimony of Company witness, Robert M. Meredith, work paper "Meredith Workpaper – Annual Schedule 100 Forecast Model" for the separate rates for administrative costs (Community Renewable Energy Agency (CREA) Rate) and resource costs (Reserve Fund CREA Rate).

Revenues for the CREA Rate and the Reserve Fund CREA Rate will be shown as a single line item on the bill and tracked separately through a spreadsheet. The rationale for separate reserve funds is that revenues affiliated with the CREA Rate will be paid to the Company for administration, whereas revenues for the Reserve fund CREA Rate will be paid for resources.

OCS Data Request 2.24

Craig M. Eller Testimony Questions - Is there a level of attrition assumed over time for participating customers, beyond the initial opt-out period? If so, please quantify this assumed attrition rate and explain how it is factored into the long-term financial modeling of the program.

(a) Given the "Initial Opt-out Period" of three billing cycles where no termination fee is incurred, what is the Company's strategy to encourage customers to remain in the program after this period, especially if they experience higher than anticipated bill impacts?

(b) For instances where the termination fee does apply, explain and justify the $30 termination fee for residential customers. Does the Company believe the fee is sufficient to discourage termination simply because customer bills may be higher than expected?

Response to OCS Data Request 2.24

Yes, there is a level of attrition assumed over time for participating customers, beyond the initial opt-out period. Please refer to tab “II-Program Costs” in “Eller Workpaper – Program Costs_URC.xlsx,” “Table C. Quantities,” lines labeled (21) through (22). The results of the assumptions are provided on the same tab, under “Table D. Program Expenses Summary”, lines labeled (8) and (14), calculated for “Noticing – paper exit confirmation” at $1,126 and “Phone Support – ongoing (12 months)” at $51,878.

(a) The Company does not have a retention strategy for the program.

(b) The Company objects to this request to the extent that it seeks information from the Agency that is not within the Company’s possession. Subject to and without waiving the foregoing objection, the Company responds as follows:

The termination fee was set by the Utah Community Renewable Energy Agency (CREA) and the Company’s understanding is that it is intended to encourage customers to participate in the program and not drop out during the two opt-out periods, opt-out period prior to program commencement date and the “Initial Opt-out Period of three billing cycles.

OCS 1.7: Please provide the analysis used to develop the proposed tiered termination fees ($30 for residential, $6/kW for large commercial, etc.). Explain how these specific amounts were determined to be sufficient to encourage program stability without being punitive.

Agency Response:

The analysis used to develop the proposed termination fees is reflected in lines 590-604 of the Direct Testimony of Christopher Thomas. The Agency did not conduct a statistical analysis to establish the proposed termination fees. In addition to the analysis set forth in testimony, the Agency responds as follows:

The Agency was reluctant to impose termination fees that would dissuade customers from wanting to participate. For residential customers, a $30 termination fee was the highest the Agency felt comfortable imposing. At the Agency's estimated average monthly bill impact of $3.21 for residential customers, $30 is the equivalent of between 9 and 10 months of program participation. Such a tradeoff might convince participants to stay in the program rather than paying the equivalent of 9-10 months of participation to exit.

However, it is notable that this termination charge is still less than the equivalent charge for Subscriber Solar customers who wish to terminate within three years. For an average residential customer consuming 637 kWh per month, covering a third of his or her consumption with Subscriber Solar would require 1 block (equivalent to 200 kWh). Terminating this block within the first three years would cost $50.

Because small commercial customers (Schedule 23) have consumption close to residential customers, it seemed appropriate to propose the same $30 termination fee. Because large commercial customers have such a wide spread of consumption, but to keep the termination fee schedule relatively simple, $6 per kW was proposed for all of these schedules (6, 8, and 9). At Rocky Mountain Power's proposed Program rate, this proposed termination fee represents the additional cost of approximately one month of participation in the Program. While this is far smaller than the 9-10 months represented by the residential termination fee, the Board was reluctant to set a termination fee so high that commercial customers would not want to participate.

The street lighting termination fee was set at a level that the representatives of local governments on the program design committee felt would not be too onerous for governments to participate. Many street lighting accounts are operated by local governments.

OCS Data Request 5.1

Regarding Opt Out Fees - Please explain in detail how the revenue collected from participant opt-out fees will be applied within the Program. Specifically, state whether this revenue will be used to offset administrative costs for the Program, be credited back to remaining Program participants, or be used in any other manner.

Response to OCS Data Request 5.1

Any opt-out fees collected will be applied to the balancing account for the Utah Community Clean Energy Program where all costs and revenues are tracked. The Company will make annual filings to present the costs and revenues, which will include the opt-out fees, where it will recommend, if necessary, changes to the Schedule 100 rates.

OCS Data Request 4.2

Resource Valuation Methodology - Please provide all underlying assumptions, workpapers, and sources used to develop the four proposed modifications to Schedule 38 (interconnection costs, transmission service costs, solar premium, and long-term valuation estimates).

(a) Please provide work papers where you have edited Schedule 38 and any details behind the proposed changes to Schedule 38.

Response to OCS Data Request 4.2

PacifiCorp is not proposing any modifications to the avoided cost pricing methodology applicable under Schedule 38 (and used in Schedule 37). Rather, PacifiCorp is proposing to account for aspects of Schedule 100 resources that are not applicable under Schedule 38.

PacifiCorp does not have any work papers related to the proposed modifications.

OCS Data Request 4.3

Resource Valuation Methodology - In response to OCS 2.6 and 2.7, the Company did not provide a methodology for determining REC value. Please provide the complete, detailed methodology the Company will use to calculate the "lost value of RECs" it proposes to charge the Program.

Response to OCS Data Request 4.3

PacifiCorp has not identified a specific methodology for determining renewable energy credit (REC) value but expects to propose a value based on recent REC transactions. REC transactions including varying prices based on the vintage and resource type and age. RECs for historical years generally have lower prices than for future years. RECs for hydro resources may have lower prices than for other resource types. RECs for new resources generally have higher prices than for resources that have been operating for many years. None of PacifiCorp's typical REC transactions included in the Utah Renewable Balancing Account (RBA) as part of Schedule 98 are likely to perfectly align with the long-term fixed-price estimate which would apply to Schedule 100 resources. As a result, the Public Service Commission of Utah (UPSC) may determine that the appropriate REC value is higher or lower than what is proposed by PacifiCorp.

DPU Data Request 2.16

Daniel J. MacNeil Testimony Questions - Reference Direct Testimony Daniel MacNeil, page 7-8, lines 143-157, please answer the following questions:

(1) What does the Company do with the RECs from the projects described here? Specifically, how do Company REC sales from non-Company owned renewable projects benefit the Company's ratepayers under Utah's voluntary RPS? Does every dollar of REC revenue translate to a dollar reduction in retail revenue requirements?

(2) If the IRP does not estimate the value for RECs, what is the basis for the valuation assumed in the valuation model?

(3) If set to zero currently, will REC values potentially be assigned in future years? If so, how?

(4) Will separate REC prices be determined based on resource type, location, or other factors? If so, please describe the methodology for doing so.

Response to DPU Data Request 2.16

(1) The Company assumes that the renewable energy credits (REC) from the projects that support the Utah Clean Energy Program will be retired, as the Utah Renewable Community have expressed interest in that approach. Company REC sales from non-Company owned renewable projects benefit ratepayers because RECs are sold by the Company where a buyer can be found and any Utah's allocation of REC sales revenue are provided to Utah customers through the REC Balancing Account (RBA).

(2) PacifiCorp's 2025 Integrated Resource Plan (IRP) did not include an estimated value for RECs for resources selected in the Utah, Idaho, Wyoming, and California (UIWC) jurisdictional analysis. As part of its Schedule 100 resource valuation, PacifiCorp will provide an estimate of the projected REC value that non-participating customers would otherwise have received during the portion of the Schedule 100 resource contract term in which the value is based on a renewable resource. This estimate is likely to reflect PacifiCorp's recent REC purchases and sales information and may include other information about REC supplies and demand.

(3) As described in the Company's response to subpart (1) above, actual revenue from sales of Utah-allocated RECs is passed back to retail customers through Schedule 98.

(4) Yes. However, PacifiCorp does not have a specific methodology at this time. REC prices primarily vary based on the vintage (the year of generation),

whether they are for forward period, current year, or prior year, and the resource's commercial operation date (COD). In general, REC prices for specific projects are higher, and technology type and location may be valued more highly by an individual purchaser. Bundled REC pricing typically treat a pool of resources interchangeably: it may exclude certain resource types that are considered less valuable, such as large hydro, and resources may only need to deliver within the western interconnect.