

Sierra Club Exhibit 1.2

RMP Response to DPU Data Request 1.2

DPU Data Request 1.2

CONFIDENTIAL REQUEST - Related to the Washington 2026 Protocol:

- (a) Please provide a copy of the final executed draft of the Washington WIJAM.
- (b) Please explain why Washington established the existing WIJAM instead of being a signatory to the 2020 Protocol.
- (c) Please explain and detail the reasons and need for a separate agreement now only for Washington. Include additional information to explain than has already been provided.
- (d) To the extent not already provided, please provide the complete Washington 2026 Protocol agreement and all related supporting documentation, including proprietary and confidential documentation.
- (e) To the extent not already provided, please provide a comparative analysis detailing the differences and the effect of the proposed allocation changes in the Washington 2026 Protocol compared to the existing Washington allocation agreement (WIJAM).
- (f) Provide the current status of PacifiCorp's (Company) Washington 2026 Protocol application.
- (g) Please explain the lack of details related to the Washington 2026 Protocol in the Company's Utah application.
- (h) To the extent not already provided, please provide the complete details and analysis of the full impact of the proposed Washington 2026 Protocol and the 2026 Protocol on PacifiCorp systemwide (including changes in NPC and revenue requirement of each PacifiCorp state).
- (i) Explain why column F and column J of the Summary tab - RMP Attachment 2 – SEM Workpapers 8-5-2025.xlsx related to Washington were minimized?
- (j) Please confirm that the total impact to Washington under the Washington 2026 Protocol is a [REDACTED] reduction.
- (k) Please confirm that Washington's total reduction of [REDACTED] was passed on as an increase in costs to the five 2026 Protocol states.

1. Please explain in detail the rationale for this and provide justification.
 2. Please explain the [REDACTED] allocation of [REDACTED] to Washington.
 3. Please explain the [REDACTED] allocation of [REDACTED] to Washington.
 4. Please explain the [REDACTED] allocation of [REDACTED] to Washington.
 5. Please explain the positive expenses allocated to Washington to arrive at the total [REDACTED] reduction to Washington.
- (l) To the extent not already provided, please provide all details, models worksheets, work papers and passwords related to the Washington 2026 Protocol, including proprietary and confidential documentation.
 - (m) Please provide more details and analysis on the treatment of [REDACTED] being situs assigned to Washington, including the distribution of the asset value and depreciation to Washington and the five 2026 Protocol states.
 - (n) Why is PacifiCorp proposing to move from [REDACTED] allocation factors to [REDACTED] allocation factors with the Washington 2026 Protocol?
 - (o) Please provide the expiration date of the Washington 2026 Protocol.
 - (p) Does RMP expect to include Washington in any interjurisdictional agreement with the other PacifiCorp states (i.e. Phase 2 or other agreements)?

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- (a) Please refer to Attachment DPU 1.2-1.
- (b) The Washington Inter-Jurisdictional Allocation Method (WIJAM) was always intended to be a transitional allocation agreement to move Washington to an allocation protocol that was consistent with the allocation protocol used by PacifiCorp's other states. The WIJAM moved away from

the previous West Control Area (WCA) methodology which did not recognize system transmission or system renewables.

- (c) Please refer to page 3 of the Direct Testimony of Company witness, Rick T. Link. The Washington Clean Energy Transformation Act (CETA) requires Washington to no longer have the costs for coal facilities in rates by January 1, 2026. Additionally, the public utility commissions in Utah, Idaho, Wyoming and Oregon have declined to allow the Company to recover the costs of operating the Chehalis generating facility in compliance with Washington law. These decisions necessitate the Company having different generation portfolios for Washington as compared to the other states. Additionally, Washington’s methodology had to be filed earlier to support the Power Cost Only Rate Case (PCORC) that was required to be filed on April 1, 2025. As a result, Washington now has a separate but complementary allocation methodology to the 2026 Protocol.
- (d) The Company has completed a revenue requirement calculation of the incremental impact to move Washington from the application of the WIJAM to PacifiCorp 2026 inter-jurisdictional cost allocation agreement (2026 Protocol) as part of the 2026 Protocol filing made in Washington under the Power Cost Only Rate Case, Docket No. UE-250224. The requested information has been summarized below:

SO Factor Impact	\$2,211,934
Non-NPC Impact	\$18,974,862
NPC Change	\$16,291,491
PTC Update	(\$1,392,909)
Coal Cost Tracker Update	(\$2,174,306)
Total	\$33,911,073

Detail supporting this calculation can be found in the subfolder NEW-PAC-Exh-SLC Workpapers in Attachment DPU 1.2-2.

- (e) Please refer to the Company’s response to subpart (d) above.
- (f) PacifiCorp’s allocation methodology was filed as part of a PCORC at the Washington Utilities and Transportation Commission (WUTC). This case is currently pending before the WUTC with hearings scheduled for early October 2025, and a decision targeted before the end of this year.
- (g) An overview of the Washington 2026 Protocol is discussed on page 3 of Rick Link’s Direct Testimony. Additionally, PacifiCorp’s filing is publicly available under Docket No. UE-250224 on WUTC’s website: [UTC](#)

- (h) Please refer to the Company's response to subpart (d) above for the revenue requirement impact, including net power costs (NPC), of implementing the 2026 Protocol on the Washington jurisdiction. Please refer to the Direct Testimony of Company witness, Shelley E. McCoy, specifically page 2, for the estimated revenue requirement, including NPC, of implementing the 2026 Protocol on California, Oregon, Utah, Idaho and Wyoming. The analysis supporting the estimated revenue requirement for Utah was provided as "25-035-47 2026 Protocol Estimated Revenue Requirement Impact Workpaper McCoy" and accompanied this filing.
- (i) As discussed in Section 3.0 – Allocation of Resources in the 2026 PacifiCorp Inter-Jurisdictional Allocation Protocol, Exhibit RMP__(RTL-1), the Company is proposing two separate portfolios for existing resources – the Five State portfolio, which includes Utah, and the Washington fixed portfolio. Column F on tab Summary of work paper "25-035-47 2026 Protocol Estimated Revenue Requirement Impact Workpaper McCoy" represents an inaccurate and incomplete calculation of the Washington jurisdiction and was therefore hidden. Column J is a subtotal which includes column F and therefore was also hidden for the same reason. The revenue requirement calculation supported in the testimony and exhibits of this proceeding represent an estimated impact of only the Five State portfolio.
- (j) Not confirmed. Please refer to the Company's response to subpart (d) above for the Washington impact of implementing the 2026 Protocol. Note: the (\$106,267,891) listed for Washington on tab Summary of work paper "25-035-47 2026 Protocol Estimated Revenue Requirement Impact Workpaper McCoy" is largely driven by a significant credit associated with NPC. This credit does not accurately reflect the NPC impact associated with serving Washington load under the Washington fixed portfolio.
- (k) Not confirmed.
 - 1. There is no rationale to explain since the assumption of Washington's reduction is not correct and there are no costs passed on to the other five 2026 Protocol states. Please refer to the Company's responses to subpart (e) and subpart (i) above.
 - 2. Please refer to the Company's response to subpart (d) above for the revenue requirement quantification for Washington or subpart (i) above for further details.
 - 3. Please refer to the Company's response to subpart (k) 2. above.
 - 4. Please refer to the Company's response to subpart (k) 2. above.

5. Please refer to the Company's response to subpart (k) 2. above.
 - (l) Please refer to the Company's response to subpart (d) above.
 - (m) To calculate the requested information, the Company used information contained with work paper "25-035-47 2026 Protocol Estimated Revenue Requirement Impact Workpaper McCoy". Specifically, the estimated value of the Chehalis plant, broken down by major expense categories, is listed on lines 50 through 53 of the "Master Pivot" tab. Toggling the dynamically calculated allocation factors listed in column R of tab "Master Pivot" provides the requested information in total. Please refer to Attachment DPU 1.2-3 which provides the requested information by revenue requirement component.
 - (n) Please refer to Rick Link's Direct Testimony, specifically page 3, lines 49-61. The intent of using fixed allocation factors is to reduce uncertainty of on-going expected policies such as, the Washington's CETA that requires coal-fueled resources to be out of Washington rates by December 31, 2025. Please refer to the Company's response to subpart (d) above for the cost allocation proposal in Washington including details on the fixed allocation factor.
 - (o) The Washington 2026 Protocol does not have an expiration date.
 - (p) The Company has not fully determined the details of any Phase 2 proposals.