

Sierra Club Exhibit 1.3

RMP Responses to Sierra Club Data Request 1.3, 1.4, 1.5, 1.13, 1.15,
and 2.3

25-035-47 / Rocky Mountain Power

October 28, 2025

Sierra Club Data Request 1.3

Sierra Club Data Request 1.3

Please provide the 2025 allocations (e.g. system generation (SG) factors) for all states under 2020 Protocol/WIJAM for all existing resources.

Response to Sierra Club Data Request 1.3

Annually, allocation percentage calculations are updated at the time the Company's annual results of operations (ROO) reports are prepared. Accordingly, annually updated allocation factors for a given calendar year will not be known until April of the calendar year following the reporting calendar year. In other words, 2025 allocation factors will not be known until April 2026.

Please refer to Attachment Sierra Club 1.3 which provides a listing of the 2024 allocation factors for all existing resources.

Sierra Club Data Request 1.4

Please confirm if Washington rates currently (prior to 2026 Protocol) exclude all existing coal resources except Bridger Units 3-4 and Colstrip Unit 4 (as characterized in the Washington 2026 Protocol Section 6). If confirmed, please describe when and why all other coal units were excluded.

Response to Sierra Club Data Request 1.4

Confirmed. With the conversion of Jim Bridger Unit 1 and Jim Bridger Unit 2 to gas-fueled, under the Washington Inter-Jurisdictional Allocation Method (WIJAM), only Jim Bridger Unit 3, Jim Bridger Unit 4 and Colstrip Unit 4 are included in Washington's rate base for ratemaking purposes. However, prior to the conversion of Jim Bridger Unit 1 and Jim Bridger Unit 2, all four Jim Bridger units were coal-fueled and included in Washington rates under both the WIJAM and the predecessor West Control Area Inter-Jurisdictional Allocation Method (WCA). Since the adoption of the WCA was approved in the Company's 2006 Washington General Rate Case (GRC), Docket UE-061546, all other coal units were excluded from Washington's rates based on the location of those units. The WCA was developed in response to the Washington Utilities and Transportation Commission's (WUTC) order in the prior GRC, Docket UE-050684. In Docket UE-050684 the WUTC rejected the Company's proposal to adopt the Revised Protocol, the system cost allocation methodology proposed across all of PacifiCorp's jurisdictions at that time. In its order, the WUTC stated, "...that PacifiCorp has not met its burden of proof to show that resources allocated¹ and that "...the Company has not sufficiently demonstrated^{2 3}, the Revised Protocol was rejected.

Considering WUTC's discussion and findings in Order 04/03 in Docket UE-050684, in the 2006 GRC, the Company proposed the WCA, which was adopted with slight modifications from parties in that same proceeding. The adopted allocation methodology excluded all coal units except the four Jim Bridger Units and Colstrip Unit 4, and this allocation of resources was maintained with the implementation of WIJAM in 2021.

¹ *Wash. Utils. & Transp. Comm'n v. PacifiCorp, d/b/a Pacific Power & Light Co.*, Docket Nos. UE-050684 and No. UE-050412, Order 04/03 at ¶ 49 (Apr. 17, 2006)

² Docket Nos. UE-050684 and No. UE-050412, Order 04/03 at ¶ 52

³ Docket Nos. UE-050684 and No. UE-050412, Order 04/03 at ¶ 62

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Sierra Club Data Request 1.5

Sierra Club Data Request 1.5

Please confirm if Washington rates currently (prior to 2026 Protocol) exclude all existing natural gas resources except Hermiston, Chehalis, and Jim Bridger 1&2 (as characterized in the Washington 2026 Protocol Section 4.2). If confirmed, please describe when and why all other natural gas resources in the PacifiCorp system were excluded.

Response to Sierra Club Data Request 1.5

Confirmed. Please refer to the Company's response to Sierra Club Data Request 1.4 which provides a description of when and why resources (including all other natural gas resources) in the Company's Eastern service territories are excluded from Washington's rates.

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Sierra Club Data Request 1.13

Sierra Club Data Request 1.13

Has PacifiCorp performed any analysis of the rate impact of alternative allocation methodologies other than the 2026 Protocol (as described for Phase 1)? If so, please specify the name and location of the work papers.

Response to Sierra Club Data Request 1.13

Rocky Mountain Power objects to this request as requiring the creation of a new analysis or report, and requesting information that is not in the Company's possession or control. Without waiving any objection, the Company responds as follows:

No.

Sierra Club Data Request 1.15

Please refer to testimony of Ramon Mitchell at pages 8-10, which describes the treatment of situs resources.

- (a) Please confirm which resources are situs assigned under the 2026 Protocol, and thus subject to the “lower-of-cost-or-market” methodology.
- (b) Please provide the allocations of the situs assigned resources by state.
- (c) Please clarify if the “lower-of-cost-or-market” methodology applies to any resources other than the situs resources provided in item (a) above.
- (d) Please clarify under what circumstances the “lower-of-cost-or-market” methodology would be necessary to share costs between states if a situs resource is fully allocated to a single state.

Response to Sierra Club Data Request 1.15

- (a) Referencing the Direct Testimony of Company witness, Ramon J. Mitchell, pages 8-10: “‘Situs’ means the allocation of all of the cost or attribute to a single state regardless of how that state’s load compares to the aggregate Five-State load. In other words, a situs resource is one that is designated for cost allocation to a specific state, rather than being shared among the Five States”, and “With the exception of qualifying facilities (“QFs”), which are addressed separately by Company witness Rick T. Link, situs resources continue to be treated using the “lower-of-cost-or-market” methodology. This practice remains unchanged...”.

Based on the foregoing context, the Company responds as follows:

- 1. Black Cap Solar.
- 2. Old Mill Solar.
- 3. Oregon Community Solar Projects (CSP).
- 4. Oregon Solar Incentive Plan (OSIP) projects.
- 5. California Net Billing Service under Schedule NB-136.
- 6. Utah Schedule 137 Net billing

- (b) Referencing Ramon Mitchell’s Direct Testimony of Ramon Mitchell, pages 8-10. “‘Situs’ means the allocation of all of the cost or attribute to a single state”.

Based on the foregoing context, the Company responds as follows:

- 1. Black Cap Solar—Oregon, 100 percent.
- 2. Old Mill Solar—Oregon, 100 percent.
- 3. Oregon CSPs—Oregon, 100 percent.

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4. OSIP projects—Oregon, 100 percent.
 5. California Net Billing Service—California, 100 percent.
 6. Utah Schedule 137 Net billing—Utah, 100 percent.
- (c) Yes, the “lower-of-cost-or-market” methodology applies to resources other than the situs resources provided in the Company’s response to subpart (a) above.
- (d) Referencing Ramon Mitchell’s Direct Testimony, pages 8-10. “Situs’ means the allocation of all of the cost or attribute to a single state”.

Based on the foregoing context, the Company responds as follows:

None. Situs resource costs are allocated to a single state. Therefore, situs resource costs cannot be shared between states.

Sierra Club Data Request 2.3

Please confirm if it is the Company's expectation that if Chehalis is 100% allocated to Washington that the State will provide no-cost carbon allowance allocations for all of the plant's generation. Conversely, please also confirm if Chehalis is not 100% allocated to Washington that the Company would need to acquire allowances for the portion designed for non-Washington retail load.

Response to Sierra Club Data Request 2.3

It is the Company's expectation that the Washington Department of Ecology (Ecology) will provide no-cost carbon allowance allocations for the emissions associated with all Chehalis generation when the facility is allocated 100 percent to Washington retail load. This expectation is consistent with the regulatory timeline:

- **April 16, 2025** – PacifiCorp petitioned the Washington Utilities and Transportation Commission (WUTC) to revise its Climate Commitment Act (CCA) supply-and-demand forecast to reflect the proposed 2026 Protocol, which allocates Chehalis entirely to Washington.
- **July 10, 2025** – The WUTC approved the revised forecast.
- **October 1, 2025** – Ecology published its 2026 no-cost allowance allocation schedule, incorporating the Company's request and providing allowances in anticipation of Chehalis being fully allocated to Washington customers, consistent with the proposed 2026 Protocol.

At this time, it is unknown whether Ecology may adjust future-year no-cost allowance allocations in the event the Chehalis facility is later determined to be overallocated to Washington relative to actual service to Washington retail load.

Conversely, it is also the Company's expectation that if Chehalis is not fully allocated to Washington, PacifiCorp would be required to acquire allowances for the portion of Chehalis emissions associated with serving non-Washington retail load, as no-cost allowances are provided solely for Washington-served load.