

Exhibit No. JRS-18
Docket UE-152253
Witness: Joelle R. Steward

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT
COMPANY,

Respondent.

DOCKET UE-152253

PACIFIC POWER & LIGHT COMPANY

EXHIBIT OF JOELLE R. STEWARD

Staff Response to Company Data Request 2

April 2016

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: March 31, 2016
DOCKET: UE-152253
REQUESTER: Pacific Power & Light

WITNESS: Jason Ball
RESPONDER: Jason Ball
TELEPHONE: (360) 664-1279

REQUEST NO. 2: Refer to Exhibit JLB-1T, Direct Testimony of Jason Ball, page 45, lines 12-15. Please clarify Staff's recommendation to increase the Company's annual conservation targets. Does the reference to the current biennium refer to 2016-2017? Accordingly, is the proposed increase of 2.5% applicable to 2016 only?

RESPONSE:

a. Does the reference to the current biennium refer to 2016–2017?

Yes.

b. Accordingly, is the proposed increase of 2.5% applicable to 2016 only?

The conservation targets are not calculated on a single year basis, so the 2.5 percent increase would apply to the entire 2016–2017 biennium. However, as it will likely be well into 2016 when the decision in this proceeding issues, Staff proposed only a 2.5 percent increase to this biennium. Staff's proposal represents conceptually the pro rata share for 2017 of a 5 percent increase for the entire conservation biennium, 2016–2017.

Based on Docket UE-152072, the Company's current conservation target is 87,814 MWh. Staff calculates the new conservation target as $87,814 \times 1.025 = 90,009$ MWh