

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	April 4, 2016	WITNESS:	Jeremy Twitchell
DOCKET:	UE-152253	RESPONDER:	Jeremy Twitchell
REQUESTER:	Pacific Power & Light	TELEPHONE:	(360) 664-1302

**REQUEST NO. 16:** Please refer to Exhibit JBT-1CT, Direct Testimony of Jeremy Twitchell, page 54, lines 3-15. If the Commission accepts Mr. Twitchell's recommended disallowance, how does Mr. Twitchell recommend that the Company model the variable and fixed costs of Jim Bridger 3 and 4 in future Washington rate filings, including general rate cases and power cost adjustment mechanism filings?

**RESPONSE:** Staff objects to the request to the extent the information requested requires the creation of a document not presently in existence. Without waiving such objections, Staff provides the following response:

Staff has not prepared such a model. Staff takes no position currently on how the Company should model these costs. In the event the Commission accepts Mr. Twitchell's recommended disallowance, the Company may want to propose how to treat its Jim Bridger 3 and 4 costs going forward.