UE-100749/PacifiCorp August 25, 2011 Public Counsel Data Request 189

## **Public Counsel Data Request 189**

PacifiCorp's Response to Public Counsel Data Request Nos. 184 and 185. In its response to Public Counsel Data Request No. 184, PacifiCorp states the following: "All REC sales contracts applicable to resources in ratebase in Washington have been provided previously." In response to Public Counsel Data Request No. 185, which asked for all "additional contracts not provided in Data Request No. 184 for any reason," PacifiCorp stated that "[t]here are no additional contracts."

With these statements in mind, please confirm whether PacifiCorp has provided all REC contracts entered into by the Company during or after CY 2009, regardless of whether the resource to which they apply is included in Washington rate base. In other words, please confirm whether there are contracts not provided that the Company believes are related only to jurisdictions not relevant to this proceeding.

## Response to Public Counsel Data Request 189

The Company objects to this request on the basis that it is argumentative and requests information related to jurisdictions not relevant to this proceeding. Without waiving this objection, the Company responds as follows:

All REC contracts have been provided.

PREPARER: Kristie Sharp

SPONSOR: To Be Determined

UE-100749/PacifiCorp August 29, 2011 Public Counsel Data Request 189

## **Public Counsel Data Request 189**

PacifiCorp's Response to Public Counsel Data Request Nos. 184 and 185. In its response to Public Counsel Data Request No. 184, PacifiCorp states the following: "All REC sales contracts applicable to resources in ratebase in Washington have been provided previously." In response to Public Counsel Data Request No. 185, which asked for all "additional contracts not provided in Data Request No. 184 for any reason," PacifiCorp stated that "[t]here are no additional contracts."

With these statements in mind, please confirm whether PacifiCorp has provided <u>all</u> REC contracts entered into by the Company during or after CY 2009, <u>regardless</u> of whether the resource to which they apply is included in Washington rate base. In other words, please confirm whether there are contracts not provided that the Company believes are related only to jurisdictions not relevant to this proceeding.

## 1st Supplemental Response to Public Counsel Data Request 189

Without waiving the Company's objections to Public Counsel Data Request 189, the Company supplements its response as follows.

Please refer to Confidential Attachment PC 189 1<sup>st</sup> Supplemental for REC contracts entered into by the Company during or after CY 2009 not previously provided to Public Counsel in this docket.

Confidential information is provided subject to the terms and conditions of the protective order in this proceeding.

PREPARER: Kristie Sharp

SPONSOR: To Be Determined