

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WALLA WALLA COUNTRY CLUB,)	
)	
Complainant,)	DOCKET UE-143932
)	
v.)	
)	
PACIFIC POWER & LIGHT)	
COMPANY,)	
)	
Respondent.)	
_____)	

EXHIBIT NO. WGC-___CCX

CONFIDENTIAL COMPANY RESPONSE TO CLUB DR 22, EXHIBIT G EXCERPTS

August 27, 2015

REDACTED

1
2 021 Please refer to Answer ¶ 13. Please provide explanation and support for the
3 following statement: "Pacific Power understands that Complainant and Columbia
4 Rural Electric Association seek to use facilities owned by Pacific Power."

4 **RESPONSE:** Generally, customers are required to install conduits and vaults. When
5 Pacific Power installs the wire, transformers and meter it takes over ownership of the
6 conduits and vaults. Thus, Pacific Power has ownership of the conduits and vaults on
7 Complainant's property. On January 7, 2013, Bill Clemens communicated with the
8 Complainant's manager Jeff Thomas. Mr. Thomas informed Mr. Clemens that CREA
9 was planning on using existing conduit. See documents attached as **Exhibit F**.

8
9 022 In regard to Rule 6, Section I of the Pacific Power's Net Removal Tariff, please
10 provide a narrative response explaining the Company's policy and/or position as to
11 when the Company is required to remove facilities in conjunction with a permanent
12 disconnection.

11 **RESPONSE:** Please see the requested policy which is attached as **Exhibit G**.

12
13 023 Please refer to Answer ¶ 22 and Complaint ¶ 22. Please provide: a) a narrative
14 response explaining the Company's policy and/or position that supports Pacific
15 Power's denial that "Rule 6 does not allow the Company to require facility removal
16 when safety and operational reasons do not make removal necessary"; and b) any
17 studies or documents containing Pacific Power's policy, as referenced in the answer
18 to part a).

17 **RESPONSE:** The denial in Paragraph 22 of the Answer simply communicates
18 Pacific Power's understanding that safety and operational reasons exist which require
19 removal of the subject facilities. In paragraph 22 of its Complaint, the Walla Walla
20 Country Club alleged to the contrary.

20
21 024 Please refer to Complaint Exh. H. Does the Company agree that, on May 31, 2013,
22 Pacific Power offered to sell conduit and vaults to the Club for \$66,718, in lieu of
23 removal? If not, please explain.

23 **RESPONSE:** Pacific Power avers that Exhibit H to the Complaint speaks for itself.
24 Accordingly, Pacific Power agrees the offer was made and rejected.
25
26

Pages 2 – 6 of Exhibit No. WGC-___CCX (Confidential Company Response to Club DR 22, Exhibit G Excerpts) are confidential per the Protective Order in UTC Docket UE-143932 and have been redacted in their entirety.