

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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

**EXHIBIT NO. RBD-\_\_CX**

**COMPANY RESPONSE TO CLUB DR 29**

**August 27, 2015**

1 029 In Docket UE-001734 testimony concerning permanent disconnection, did the  
2 Company provide any operational reasons necessitating or supporting facility  
3 removal, other than circumstances in which PacifiCorp or remaining customers  
4 would be required to absorb removal costs? If yes, please explain the basis or  
5 methodology to calculate the costs to the remaining customers.

6 **RESPONSE:** Objection – this request is unduly burdensome in that the requested  
7 information is publicly available and readily obtainable by Complainant. Further, the  
8 testimony speaks for itself. Subject to and without waiving these objections, Bill  
9 Clemens testified and provided certain operational reasons requiring and supporting  
10 facilities removal. For example, Mr. Clemens testified that Pacific Power should not  
11 have to absorb the removal costs and remaining customers should not be responsible  
12 for bearing the costs of including an annual net removal expense in rates as a matter  
13 of sound regulatory policy. The costs to individual remaining customers is difficult to  
14 determine. It involves the customer base absorbing the cost of installing facilities on  
15 behalf of the customer who later requests permanent disconnection. To address that  
16 inequity the customer seeking permanent disconnection should be required to cover  
17 the net book value (“NBV”) of the facilities.