

**Exh. JLB-5C
Docket UE-170717
Witness: Jason L. Ball
REDACTED VERSION**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PACIFIC POWER & LIGHT CO.,

Respondent.

DOCKET UE-170717

**EXHIBIT TO
TESTIMONY OF**

Jason L. Ball

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*Company Response to Informal UTC Staff Data Request Nos. 4 and 5, UTC Staff Data
Request No. 2 and Confidential Attachment*

January 25, 2018

UE-170717 / Pacific Power & Light Company
September 26, 2017
WUTC Data Request 4

WUTC Data Request 4

**RE: Direct testimony of Michael G. Wilding, Exhibit No. MGW-1T at 13:13
– 14:5, Joy Longwall abandonment.**

Please provide all external or internal communication or documentation at the director level and higher detailing management involvement or decision regarding the Joy Longwall abandonment.

Response to WUTC Data Request 4

PacifiCorp objects to this request as overly broad, unduly burdensome, seeking information not maintained in the ordinary course of business, and may include privileged communications between client and legal counsel. Internal emails are not routinely saved, and are automatically deleted in the normal course of business after 100 days unless deliberately saved by a user. Without waiving these objections, the Company responds as follows:

PacifiCorp searched its files and did not find communications detailing management involvement or decision regarding the Joy Longwall abandonment. The abandonment decision was made in response to worsening safety conditions in the mine. Specifically, on Friday October 7, 2016, Bridger Coal Company underground mine management called Dana M. Ralston (Vice President, Coal Generation and Mining) to report on safety issues related to the recovery of the Joy Longwall. Mr. Ralston conferenced in Cindy A. Crane (President and Chief Executive Officer, Rocky Mountain Power) and it was decided that recovery efforts would cease due to the safety concerns discussed.

The Mining Safety and Health Administration (MSHA) was contacted on October 7, 2017, and on Monday, October 10, 2016, MSHA inspected the 14th Right longwall section and issued a 103(k) order “to assure the safety of any person in the mine.” Please refer to Confidential Attachment WUTC 4.

PacifiCorp provides Confidential Attachment WUTC 4 as confidential under RCW 80.04.095 in accordance with WAC 480-07-160.

PREPARER: David Webb

SPONSOR: Michael G. Wilding

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by the attorney-client privilege or other applicable privileges or law may have been included in its responses to these data requests. PacifiCorp did not intend to waive any applicable privileges or rights by the inadvertent disclosure of protected information, and PacifiCorp reserves its right to request the return or destruction of any privileged or protected materials that may have been inadvertently disclosed. Please inform PacifiCorp immediately if you become aware of any inadvertently disclosed information.

UE-170717 / Pacific Power & Light Company
September 26, 2017
WUTC Data Request 5

WUTC Data Request 5

**RE: Direct testimony of Michael G. Wilding, Exhibit No. MGW-1T at 13:13
– 14:5, Joy Longwall abandonment.**

Has the Company updated its Bridger Mine Plan or long-term fueling forecast as a result of the Joy Longwall abandonment? If so, please provide an unredacted version of the mine plan and/or long-term fueling forecast as well as the previous version.

Response to WUTC Data Request 5

No, the Company has not updated its Bridger Coal Company (BCC) mine plan or Jim Bridger plant long-term fueling forecast specifically as a result of the Joy Longwall abandonment. The Company updates its mine plans and long-term fueling forecasts in the normal course of business. The severe geological features discovered while mining the 14th Right panel with the Joy Longwall, as well as additional drilling and testing, and operational requirements of the DBT Longwall are factors in future plans and forecasts. However, many other factors contribute to changes and updates such as market conditions, third-party coal contracts, and plant burn requirements.

PREPARER: David Webb

SPONSOR: Michael Wilding

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WUTC Data Request 2

Regarding the direct testimony of Michael G. Wilding, Exhibit MGW-1T at 13:13 - 14:5 and at 16:1-2, Joy Longwall abandonment, please provide all external or internal communication or documentation at the director level or higher discussing the Joy Longwall from the date it first became nonoperational (December 2015) through the decision to abandon the equipment (early October 2016).

Response to WUTC Data Request 2

The Company objects to this data request as overly broad and not reasonably targeted to lead to the discovery of admissible evidence. Without waiving this objection, the company responds as follows:

Please refer to Confidential Attachment WUTC 2 and Confidential Attachment WUTC 3, submitted September 26, 2017, in response to WUTC Informal Data Request 3.

Confidential information is provided subject to the terms and conditions of the protective order filed on October 26, 2017 and may only be viewed by qualified persons under that order.

PREPARER: Brad Davis

SPONSOR: Michael G. Wilding

**Pages 4 through 37 of
Exh. JLB-5C are redacted.**