

Exhibit No. RTL-16  
Docket UE-152253  
Witness: Rick T. Link

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT  
COMPANY,

Respondent.

DOCKET UE-152253

**PACIFIC POWER & LIGHT COMPANY**

**EXHIBIT OF RICK T. LINK**

**STAFF'S RESPONSE TO PACIFIC POWER DATA REQUEST NO. 47**

**May 2016**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF  
RESPONSE TO DATA REQUEST

DATE PREPARED:	May 12, 2016	WITNESS:	Jeremy B. Twitchell
DOCKET:	UE-152253	RESPONDER:	Jeremy B. Twitchell
REQUESTER:	Pacific Power & Light	TELEPHONE:	(360) 664-1302

**REQUEST NO. 47:** Refer to Exh. JBT-19HCT (to be renumbered as JBT-28HCT), page 26, lines 8-11. Please identify the following:

- a. The new information provided by the Company in its rebuttal case to which Staff refers, by exhibit cite with page and line references.
- b. The new information provided by the Company in subsequent discovery to which Staff refers, by data request name and number.

**RESPONSE:**

- a. Please refer to the following passages:
  - Exhibit No. RTL-11CT at 6:1-12
  - Exhibit No. RTL-11CT at 7:17-8:2
  - Exhibit No. RTL-11CT at 13:6-7
  - Exhibit No. RTL-11CT at 18:3-14
  - Exhibit No. RTL-11CT at 27:10-17
  - Exhibit No. CAT-14CT at 4:9-11
  - Exhibit No. CAT-14CT at 9:6-10:9
  - Exhibit No. CAT-14CT at 11:1-13
  - Exhibit No. CAT-14CT at 14:15-20
  - Exhibit No. CAT-18C
  - Exhibit No. CAT-20C
  - Exhibit No. CAT-21C
  - Exhibit No. CAT-22C
  - Exhibit No. CAT-23C
  - Exhibit No. DR-1CT at 2:18-21
  - Exhibit No. DR-1CT at 3:10-11
  - Exhibit No. DR-1CT at 4:5-10
  - Exhibit No. DR-1CT at 5:1-4, 8-13
  - Exhibit No. DR-1CT at 5:23-6:3
  - Exhibit No. DR-1CT at 7:14-22
  - Exhibit No. DR-1CT at 8:1-11
  - Exhibit No. DR-1CT at 8:12-end of page
  - Exhibit No. DR-1CT at 10:7-14:5
  - Exhibit No. DR-2C
  - Exhibit No. DR-3C
  - Exhibit No. DR-4C
- b. Please refer to the following data requests:
  - Company supplemental response to Staff Data Request No. 99
  - Company response to Sierra Club Data Request No. 36