Exh. DCG-15 Docket UE-190882 Witness: David C. Gomez

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

DOCKET UE-190882

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

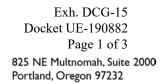
EXHIBIT TO TESTIMONY OF

David C. Gomez

STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Pacific Power's Responses to UTC Staff Data Request Nos. 8 and 9

January 10, 2020





Septmeber 4, 2019

Joe M. Dallas, WSBA No. 54506 Office of the Attorney General Utilities and Transportation Division P.O. Box 40128 Olympia, WA 98504-0128 joe.dallas@utc.wa.gov

Betsy DeMarco betsy.demarco@utc.wa.gov Krista Gross krista.gross@utc.wa.gov

RE: WA UE-190458

WUTC Data Request (8-9)

Please find enclosed Pacific Power & Light Company's Responses to WUTC Data Requests 8-9.

If you have any questions, please call me at 503-813-5410.

___/s/___

Sincerely,

Ariel Son Regulatory Affairs Manager UE-190458 / Pacific Power & Light Company September 4, 2019 WUTC Data Request 8

WUTC Data Request 8

RE: Documents demonstrating prudency re 2018 Colstrip Units 3 and 4 derate and outage

Please confirm/admit or deny that Pacific Power has produced all contemporaneous documentation of all analyses and/or decision making in its or in Talen's possession relating to: (1) the elevated particulate matter levels at Colstrip Units 3 and 4 during Q1 2018; (2) the 2018 Colstrip Units 3 and 4 derate and outage; and/or (3) the acquisition and/or cost of replacement power associated with the 2018 Colstrip Units 3 and 4 derate and outage. If any such documents exist but have *not* been produced, please produce these documents as a response to this data request.

This documentation and/or information is needed to demonstrate to Staff the prudency of the Company's and its agent's conduct, decision-making, and deliberative processes, as well as for Staff to know the elements the Company and its agents used in its decision making and the manner in which the Company and its agents valued each of those elements.

Response to WUTC Data Request 8

Pacific Power considers these requests overly broad, unduly burdensome, and not reasonably calculated to lead to admissible information. However, without raising or waiving any objections, Pacific Power has proposed to have a workshop with the Washington Utilities and Transportation Commission (WUTC) staff to provide more information about these events and possibly narrow the scope of these data requests. It is Pacific Power's understanding that WUTC staff has agreed to an extension in responding to these data requests as the logistics of having this workshop are yet to be determined. Pacific Power expressly reserves the right to raise any objection to this data request at a later date.

PREPARER: Counsel

SPONSOR: TBD

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UE-190458 / Pacific Power & Light Company September 4, 2019 WUTC Data Request 9

WUTC Data Request 9

UTC STAFF DATA REQUEST NO. 9: RE: Officer, executive, and/or witness knowledge

Please state whether any Company officers, executives, or any witnesses that intends to testify on behalf of the Company (should this matter proceed to adjudication) have any knowledge of the analyses and/or decision making relating to: (1) the elevated particulate matter levels at Colstrip Units 3 and 4 during Q1 2018; (2) the 2018 Colstrip Units 3 and 4 derate and outage; and/or (3) the acquisition and/or cost of replacement power associated with the 2018 Colstrip Units 3 and 4 derate and outage. If such individuals have knowledge that has not yet been provided by the Company, please memorialize and provide the substance of those individuals' knowledge as a response to this data request.

Response to WUTC Data Request 9

Pacific Power considers these requests overly broad, unduly burdensome, and not reasonably calculated to lead to admissible information. However, without raising or waiving any objections, Pacific Power has proposed to have a workshop with the Washington Utilities and Transportation Commission (WUTC) staff to provide more information about these events and possibly narrow the scope of these data requests. It is Pacific Power's understanding that WUTC staff has agreed to an extension in responding to these data requests as the logistics of having this workshop are yet to be determined. Pacific Power expressly reserves the right to raise any objection to this data request at a later date.

PREPARER: Counsel

SPONSOR: TBD