

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

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

DOCKET UE-190882

**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.

Sincerely,

____/s/____
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 prudence 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 prudence 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

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

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.