

**PUBLIC COUNSEL DATA REQUEST PC-3 TO CREA:**

PC-3. Refer to the Direct Testimony of R. Bryce Dalley, RBD-1T at 3:4-8, which states:

“In just two counties in Washington (Columbia and Walla Walla), the regulated electric utility (Pacific Power) has been unable to negotiate a service area agreement with the rural electric association (Columbia REA), despite engaging in negotiations—including negotiations mediated by a Commission administrative law judge.”

- a. What is the current status of efforts to negotiate a service territory (or “boundaries”) agreement between Pacific Power and CREA in Columbia and Walla Walla counties?
- b. From CREA’s perspective, why negotiations did not succeed in advancing an agreement between the two parties, even with the introduction of a mediator?
- c. Please discuss with reasonable specificity what CREA requires from Pacific Power to successfully complete these negotiations?

**RESPONSE TO PUBLIC COUNSEL DATA REQUEST PC- 3:**

CREA objects to Public Counsel Data Request No. PC-3 on the basis that the information requested is not relevant to the “primary issue in this proceeding [which] relates to the rates, terms, and conditions of [Pacific Power’s] proposed tariff filings”<sup>3/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

- a. Please see CREA’s response to Staff Data Request 2. Under current management, CREA has sent two letters to Pacific Power’s CEO seeking to improve relations and coordination between the companies. These letters are included as Attachment A to Public Counsel Data Request PC-3. CREA did not receive a response to either letter.
- b. Please see CREA’s response to Staff Data Request 2.
- c. In addition to the objections above, CREA objects to this request on the grounds that it seeks information protected by the attorney-client privilege.

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<sup>3/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

Date: March 28, 2017  
Respondent: Les Teel  
Witness: Les Teel



Columbia Rural  
Electric Association

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August 22, 2013

Pat Reiten  
PacifiCorp President and CEO

**Re: Letter Dated August 19, 2012 (should be 2013) from Mike Gavin**

Dear Mr. Reiten:

Through the above-referenced letter Mr. Gavin is continuing his campaign of making false claims and unsupported statements about CREA. It appears, given the recipients of his letter, that his actions are designed to agitate and interfere with our ability to do business in Walla Walla and Columbia Counties. It is my expectation that we can stop these distractions caused by Mr. Gavin and proceed down a cooperative path where we are both simply dedicated to providing quality electric service in a safe manner, as a matter of choice.

I take seriously Mr. Gavin's allegations that CREA employees are "jeopardizing" public safety and engaging in "threatening public behavior". In this regard, please provide me, in writing, with an identification of both the specific safety and "threatening public behavior" incidents. Include the actual incident/statement(s), the time, date, and place where the incident occurred and the name of the Pacific Power employee (or other individual) that heard or witnessed the incident or statement. As for safety incidents or "things" referred to by Mr. Gavin, a reference to an industry standard or regulation is requested. It is important we immediately address and correct the misinformation Mr. Gavin has sent to our members and community partners.

To date, our efforts to work with Mr. Gavin have not been productive. It seems as if his actions are designed to interfere and frustrate CREA's ability to serve its members and operate within our Franchise Agreements. Given the actions of Mr. Gavin and that his credibility has been questioned by public individuals and independent experts in our industry, I plan to direct my communications to you.

I invite you to contact me personally so that we can discuss the "concerns" of Pacific Power and how we can facilitate "effective communication between the two utilities." You should know that despite Mr. Gavin's recent propensity to antagonize, we have historically maintained good relations with your company.

Thank you for your anticipated courtesies.

August 22, 2013  
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Very truly yours,



Les Teel, CEO

cc Board of Directors  
General Counsel  
Mike Gavin  
Scott Peters  
Dave Reller



# Columbia REA

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February 26, 2015

Mr. Pat Reiten  
PacifiCorp  
825 NE Multnomah St.  
Portland, OR 97232

Re: Intercompany Relations

Dear Mr. Reiten:

Through this letter, I would like to suggest that we arrange a time to meet and discuss the mutual interests of our companies in providing electric services. I believe we can acknowledge that establishing communication and coordination practices will benefit the communities and areas that both companies serve. Clearly, we should strive to achieve one simple goal: delivering to the communities and customers quality, reliable and cost-effective services.

Improving the communication between key staff that are involved with the design, construction and maintenance of each company's facilities is a good starting point. This could include communication concerning construction activities, sharing of easements and right-of-way, and periodically meeting with the various governmental entities that permit us to jointly use their public property. Second, while we have had numerous discussions concerning safe practices under the National Electric Safety Code (NESC) and the National Electrical Code (NEC), it should be simple to agree that these uniform national standards should be our baseline. With respect to individual policies or standards that may be the preferred practice by either PacifiCorp or Columbia REA, this is a matter which we can discuss and attempt to reach a common understanding. Especially since both companies have qualified professionals who continuously monitor and train employees in required and best practices.

The above steps should enhance the working relationship between our companies. If we are able to come to a common understanding on the above matters, we will alleviate some of the claims, accusations, and frustration that have been occurring the past few years.

Please contact me so we can discuss a meeting at our mutual convenience.

Sincerely,

Les Teel  
CEO, Columbia REA

cc: Board of Directors, Columbia REA

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