

PACIFIC POWER DATA REQUEST NO. 12 TO CREA:

Does Columbia REA comply with the State of Washington’s renewable portfolio standards requirements, conservation acquisition standards, and the Clean Air Rule?

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 12:

CREA objects to Pacific Power Data Request No. 12 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,”^{12/} and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

CREA is not required to comply with the cited laws and regulations. CREA does, however, pay for conservation within its service territory. Over the past five years, CREA has paid out an annual average of \$288,820 for energy efficiency.

^{12/} Order 04 ¶ 12 (Jan. 4, 2017).

Date: March 10, 2017
Respondent: Les Teel
Witness: Les Teel