

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKETS UE-191024,
UE-190750, UE-190929,
UE-190981, UE-180778
(Consolidated)

DECLARATION OF DANIEL J.
TEIMOURI IN SUPPORT OF
COMMISSION STAFF
MOTION TO COMPEL
DISCOVERY

I, DANIEL J. TEIMOURI, under penalty of perjury under the laws of the State of Washington, declare as follows:

1 I am over 18 years of age, a citizen of the United States, a resident of the State of Washington, and competent to be a witness.

2 I am employed by the Washington State Attorney General's Office as an Assistant Attorney General in the Utilities and Transportation Division.

3 On April 17, 2020, I received the response of Pacific Power & Light Company ("Pacific Power") to Commission Staff Data Request No. 223 (DR 223) via email. Pacific Power's response to DR 223 is attached to this motion as Attachment A.

4 On April 22, 2020, I participated in a telephone conference with counsel from Pacific Power & Light Company ("Pacific Power") in an effort to informally resolve the discovery dispute regarding Pacific Power's objection to the production of documents in response to DR 223.

5 During the call on April 22, 2020, Pacific Power's counsel offered to provide Staff with the raw data inputs that the Company submitted to the Oregon Public Utility Commission (OPUC), but declined to produce, in response to DR 223, complete versions of the requested testimony and exhibits of OPUC witness Moya Enright in Docket No. UE 356 and the unredacted versions of the OPUC's decision in Docket No. UE 356.

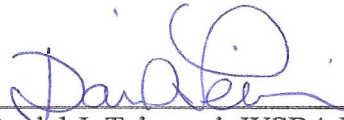
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It is my understanding that the confidential information requested in DR 223 is Pacific Power's confidential information and not that of any other party to OPUC Docket No. UE 356.

DATED at Olympia, Washington, and effective this 11th day of May 2020.



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