

**UE-191024**

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



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Portland, Oregon 97232

April 17, 2020

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RE: **WA UE-191024**  
WUTC Data Request (218-228)

Please find enclosed PacifiCorp's Responses to WUTC Data Requests 218-228. Also provided are Attachments WUTC 219 Redacted, 225, 226, and 228. Provided via encryption is Confidential Attachment WUTC 219 and Confidential Responses WUTC 225, 226 and 227. The Confidential documents are confidential per Protective Order in UTC Docket UE-191024.

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

Sincerely,

\_\_\_\_/s/\_\_\_\_  
Ariel Son  
Regulatory Affairs Manager

C.c.: Service List

UE-191024 / PacifiCorp  
April 17, 2020  
WUTC Data Request 223

### **WUTC Data Request 223**

#### **EIM and Greenhouse Gas Benefits**

Please provide the confidential versions of the testimony and any exhibits of Oregon Public Utility Commission witness Moya Enright in Docket No. UE 356. If available, please also provide the Oregon PUC's decision in Docket No. UE 356. If there is confidential information in the order, please provide the confidential version.

### **Response to WUTC Data Request 223**

PacifiCorp objects to this request on the grounds that the information sought is outside the scope of this proceeding and that this request is not reasonably calculated to lead to admissible evidence. . Without waiving these objections, the company responds as follows:

Public versions testimony, exhibits, and the Oregon Public Utility Commission (OPUC) order is available on the OPUC website at the following link:

<https://apps.puc.state.or.us/edockets/DocketNoLayout.asp?DocketID=21842>

PREPARER: Counsel

SPONSOR: Not Applicable

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.