

Exhibit No. DMR-9
Docket UE-170717
Witness: Dana M. Ralston

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of

PACIFIC POWER & LIGHT
COMPANY,

2016 Power Cost Adjustment Mechanism

Docket UE-170717

PACIFIC POWER & LIGHT COMPANY

EXHIBIT OF DANA M. RALSON

**BOISE WHITE PAPER L.L.C. RESPONSES TO PACIFIC POWER'S DATA
REQUESTS**

March 2018

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February 20, 2018

Via Electronic Mail

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Re: PACIFIC POWER & LIGHT COMPANY
2016 Power Cost Adjustment Mechanism
Docket UE-170717

Dear Mr. McVee and Mr. Kumar:

Enclosed please find Boise White Paper, L.L.C.'s Response to Pacific Power's First Set of Data Requests in the above-referenced matter.

If you have any questions, please do not hesitate to call.

Sincerely,

/s/Haley M. Thomas
Haley M. Thomas

Enclosure

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of)
) DOCKET UE-170717
PACIFIC POWER & LIGHT)
COMPANY,) BOISE WHITE PAPER, L.L.C'S
) RESPONSE TO PACIFIC POWER'S
2016 Power Cost Adjustment Mechanism.) FIRST SET OF DATA REQUESTS
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Boise White Paper, L.L.C (“Boise”) responds to Pacific Power & Light Company’s (“Pacific Power”) First Set of Data Requests as follows. Subject to the objections below, Boise will provide responses and responsive documents to Pacific Power’s First Set of Data Requests. Further, any future responses and responsive documents from Boise will also be subject to the objections below.

GENERAL OBJECTIONS

1. Boise objects to the instructions set forth in Pacific Power’s Data Requests to the extent that these instructions impose obligations on Boise that exceed, are unauthorized by, or are inconsistent with the discovery rules.
2. Boise objects to the request to the extent that the data requested is not relevant to the issues identified in this proceeding.
3. Boise objects to the request to the extent that production of the data requested would be unduly burdensome and that the request is overly broad.

4. Boise objects to the request to the extent that production of the requested data would reveal information protected by the attorney-client privilege, and/or the work product doctrine, and/or any other relevant privilege.

5. Each of the preceding general objections is incorporated by reference in each specific response below.

PACIFIC POWER DATA REQUEST NO. 001 TO BOISE:

With regards to the education and work experience of Boise White Paper witness Mr. Bradley G. Mullins:

- a. Please list all on-site underground mine visits including location, duration, and mining systems used.
- b. Please provide all formal training including dates for mining, geology, industrial mining equipment, and geotechnical surveying related to mining.
- c. If external sources were used for preparation of testimony regarding mining, geology, industrial mining equipment, or geotechnical surveying related to mining, please provide sources and associated documentation.

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 001:

Boise objects to this request on the basis the request is overly broad and not intended to lead to discovery of information that is relevant to the matter. Without waiving the foregoing objections, Boise responds as follows.

- a. Mr. Mullins has not had the opportunity to perform a site visit at an underground coal mine.
- b. Mr. Mullins routinely engages in formal technical workshops with utilities where issues relating to mining, geology, industrial mining equipment, and geotechnical surveying related to mining are discussed, although Mr. Mullins does not possess a log of all such workshops. For example, on January 11, 2018, Mr. Mullins participated in a workshop hosted by PacifiCorp, where the potential closure of Bridger Coal Company mine was discussed in detail, including issues surrounding mining geology, industrial mining equipment, and geotechnical surveying.
- c. Please see Exhibits BGM-5 through BGM-15 to Mr. Mullins' Response Testimony.

Date: February 20, 2018
Respondent: Bradley G. Mullins
Witness: Bradley G. Mullins

PACIFIC POWER DATA REQUEST NO. 002 TO BOISE:

Please refer to Exhibit BGM-3C:

- a. Does Mr. Mullins' analysis consider the cost savings relative to budget that occurred during 2016 at the surface mine?
- b. If Mr. Mullins' analysis does not consider the cost savings relative to budget at the surface mine that occurred during 2016, please explain why.
- c. Is Mr. Mullins aware that during the 2016 deferral period there was a reduction of coal burn compared to budget among the overall PacifiCorp coal generation based on actual market conditions?
- d. Does your analysis include any adjustment for actual market conditions, and if so, based on what assumptions and data?

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 002:

Boise objects to this request on the basis the request is overly broad and not intended to lead to discovery of information that is relevant to this matter. Notwithstanding, Boise responds as follows.

- a. No.
- b. Since the longwall failure did not impact production at the surface mine, Mr. Mullins' analysis only considered the costs and output from the underground mine. Any cost savings at the surface mine are unrelated to the cost of the longwall failure.
- c. Mr. Mullins' analysis only considered production from the underground mine. The actual generation from Jim Bridger is irrelevant because the coal from the underground mine can be stockpiled to Jim Bridger's coal inventory.
- d. See response to sub-request c.

Date: February 20, 2018
Respondent: Bradley G. Mullins
Witness: Bradley G. Mullins

PACIFIC POWER DATA REQUEST NO. 004 TO BOISE:

Please reference Exhibit BGM-1CT, page 8, lines 14-20: Did Mr. Mullins's analysis of the lost production take into account reduced coal thermal generation due to lower natural gas market prices? If so, please explain how this was accounted for in the analysis.

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 004:

Boise objects to this request on the basis the request is not intended to lead to discovery of information that is relevant to this matter. Without waiving the foregoing objections, Boise responds as follows:

Please see Boise's Response to Pacific Power Request 2, sub-request c.

Date: February 20, 2018
Respondent: Bradley G. Mullins
Witness: Bradley G. Mullins