

September 1, 2015

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***


Steven V. King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

RE: Docket UE-143932—Pacific Power & Light Company's Supplemental Cross Examination Exhibit and Revised Exhibit List

Pacific Power & Light Company, a division of PacifiCorp, submits for filing two copies of its supplemental cross examination exhibit and revised exhibit list.

If you have any informal inquiries regarding this matter, please contact Ariel Son, Manager, Regulatory Projects, at (503) 813-5410.

Sincerely,


R. Bryce Dalley
Vice President, Regulation

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all parties of record in this proceeding by electronic mail and/or Overnight Delivery.

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DATED at Portland, OR this 1st of September, 2015.



Amy Eissler
Coordinator, Regulatory Operations

EXHIBIT LIST

Docket UE-143932

WALLA WALLA COUNTRY CLUB WITNESSES				
Bradley G. Mullins, Independent Consultant				
BGM-1CT	Bradley G. Mullins, for Walla Walla Country Club			Confidential Direct Testimony
BGM-2				Qualification Statement of Bradley G. Mullins
BGM-3				Exhibit Filing Excerpts from Docket UE-130043
BGM-4C				Confidential Company Responses to Club Data Requests
BGM-5C				Confidential Club Letter Proposing Facilities Sale
BGM-6T				Rebuttal Testimony
BGM-7				General Service Contract Between Pacific Power and Walla Walla School District 140
BGM-8C				Confidential Company Responses to Club Data Requests
CROSS-EXAMINATION EXHIBITS				
BGM-9CX				January 10, 2013, Email from Jeff Thomas to Scott Peters
BGM-10CX				January 7, 2013, Email from Michael Gavin to Jeff Thomas
BGM-11CX				December 20, 2012, Email from Jeff Thomas to Scott Peters
BGM-12CX				November 9, 2012, Email from Jeff Thomas to Scott Peters
BGM-13CX				Club Responses to Company's Third Set of Data Requests
BGM-14CX				Fair Market Value Appraisal
BGM-15CX				Supplemental Response to Pacific Power's Data Request 58
David J. Marne, President and Senior Electrical Engineer, Marne and Associates, Inc.				
DJM-1CT	David J. Marne, for Walla Walla Country Club			Confidential Direct Testimony
DJM-2				Curriculum Vitae
DJM-3C				Confidential Company Responses to Club Data Requests
DJM-4				NESC Rule Excerpts (Sections 1, 2, and 31)
DJM-5T				Rebuttal Testimony
DJM-6				NESC Rule Excerpts (Section 35)

EXHIBIT LIST

Docket UE-143932

CROSS-EXAMINATION EXHIBITS				
DJM-7CX				Aerial Photo of the Walla Walla Country Club and Surrounding Area, with Indication of the Electric Facilities
DJM-8CX				Club Responses to Company's Third Set of Data Requests
Jeffery C. Thomas, General Manager, Walla Walla Country Club				
JCT-1T	Jeffrey C. Thomas, for Walla Walla Country Club			Direct Testimony
JCT-2				Club and Company Responses to Data Requests
JCT-3				Exhibit Filing (PLT-9) from Docket UE-130043
JCT-4T				Rebuttal Testimony
JCT-5				Order Re Defendant's Motion to Dismiss, United States District Court for the Eastern District of Washington (Exhibit A to Complaint)
JCT-6				Declaration of Jeff Thomas (Exhibit B to Complaint)
JCT-7				December 11, 2012, Letter to Pacific Power from Thomas K. Baffney for the Club (Exhibit C to Complaint)
JCT-8				January 25, 2013, Letter to Thomas K. Baffney from Mike Gavin for Pacific Power With Attachments (Exhibit D to Complaint)
JCT-9				March 18, 2013, Letter to Thomas K. Baffney from Michelle Mishoe for Pacific Power With Attachment (Exhibit E to Complaint)
JCT-10				May 3, 2013, Letter to Michelle Mishoe from Thomas K. Baffney for the Club (Exhibit F to Complaint)
JCT-11				May 23, 2013, Letter to Michelle Mishoe from Thomas K. Baffney for the Club (Exhibit G to Complaint)
JCT-12				May 31, 2013, Letter to Thomas K. Baffney from Michelle Mishoe for Pacific Power (Exhibit H to Complaint)
JCT-13				Pacific Power Tariff WN U-75, Rule 6 (Exhibit I to Complaint)

EXHIBIT LIST

Docket UE-143932

CROSS-EXAMINATION EXHIBITS				
JCT-14CX				November 5, 2012, Email from Jeff Thomas to Scott Peters
JCT-15CX				October 17, 2012, Letter from Scott Peters to Jeff Thomas
JCT-16CX				Club Responses to Company's First Set of Data Requests
JCT-17CX				Club Responses to Company's Second Set of Data Requests
JCT-18CCX				Joint Representation Agreement
JCT-19CX				January 10, 2013, Email from Jeff Thomas to Scott Peters
JCT-20CX				January 7, 2013, Email from Michael Gavin to Jeff Thomas
JCT-21CX				December 20, 2012, Email from Jeff Thomas to Scott Peters
JCT-22CX				November 9, 2012, Email from Jeff Thomas to Scott Peters
JCT-23CX				Club Responses to Company's Third Set of Data Requests
JCT-24CX				Aerial Photo of the Walla Walla Country Club and Surrounding Area, with Indication of the Electric Facilities
PACIFIC POWER & LIGHT WITNESSES				
R. Bryce Dalley, Vice President of Regulation, Pacific Power				
RBD-1T	R. Bryce Dalley, for Pacific Power & Light Company			Direct Testimony
RBD-2				Map of Walla Walla Electric Service Area in 1997, 2007, 2010, and 2013
RBD-3				Page 6 of Club's Response to Company's Second Set of Data Requests
RBD-4				Professional Profile of Attorney Stanley M. Schwartz
RBD-5				January 3, 2013, Agreement between Walla Walla Country Club and Columbia REA
RBD-6				November 30, 2012, Electric Service Agreement between Walla Walla Country Club and Columbia REA
RBD-7				Columbia REA Customer Requested Work Agreement
RBD -8				Documents Relating to the Removal of Conduit on Columbia REA Property

EXHIBIT LIST

Docket UE-143932

CROSS-EXAMINATION EXHIBITS				
RBD-9CX				Company Response to Club DR 29
RBD-10CX				Company Response to Club DR 40
RBD-11CX				Company Response to Club DR 52
RBD-12CCX				Confidential Company Response to Club DR 65
RBD-13CX				Company Response to Club DR 71
RBD-14CX				Excerpt of Pacific Power Six-State ESR
RBD-15CX				Pacific Power General Service Contracts
RBD-16CX				Pacific Power E-Mail From Mr. Gavin
William G. Clemens, Senior Regional Business Manager, Pacific Power				
WGC-1T	William G. Clemens, for Pacific Power & Light Company			Direct Testimony
WGC-2				Walla Walla Safety Issue Illustrations
CROSS-EXAMINATION EXHIBITS				
WGC-3CX				Company Response to Club DR 87
WGC-4CX				Aerial Photo of Walla Walla Club Property
WGC-5CCX				Confidential Company Response to Club DR 22, Exhibit G Excerpts

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

THE WALLA WALLA COUNTRY CLUB,

Complainant,

vs.

PACIFIC POWER & LIGHT COMPANY, a
division of PACIFICORP,

Respondent.

Docket UE-143932

SECOND SUPPLEMENTAL RESPONSE
TO PACIFIC POWER DATA
REQUEST 58 TO THE WALLA WALLA
COUNTRY CLUB

58. This data request is directed to Mr. Mullins. Please set forth the projected cost of both labor and materials, in the event Columbia Rural Electric Association were required to install the underground facilities to replace those that Mr. Mullins argues the Company should be forced to transfer at net book value.

RESPONSE:

The Club objects on the basis that Pacific Power has ample opportunity to obtain the information sought as an electric service provider itself. Moreover, the Club objects on the basis that the information is obtainable from a more convenient source—namely, the Company itself, in its capacity as an electric service provider. The Club also objects in that the Company mischaracterizes Mr. Mullins’ testimony, since Mr. Mullins does not argue that the Company should be “forced” to do anything.

SUPPLEMENTAL RESPONSE: See Response and Supplemental Response to DR 46. Further, as set forth in the 8.24.15 letter from Attorney Greenfield, Pacific Power presumes Mr. Mullins has been made aware of the costs of labor and materials

to install underground facilities on the Country Club property. Mr. Mullins has not been made aware of the Columbia REA cost to install underground facilities on the Country Club property in order to provide service to their buildings and facilities.

SECOND SUPPLEMENTAL RESPONSE: On August 27, 2015, Mr. Mullins had a discussion with a representative of Columbia Rural Electric Association, regarding projected costs, in the event that Columbia Rural Electric Association was to use Pacific Power facilities, rather than installing new facilities at the Club.

Without waiving prior objections, and based on his discussion with Columbia Rural Electric Association, Mr. Mullins has come to understand that the neither the Club, nor Columbia Rural Electrical Association, intends to use any of the electrical components reflected in the net book value calculations discussed in Mr. Mullins' testimony. This is due to Mr. Mullins' understanding that Columbia Rural Electrical Association will provide electrical service at a different voltage than previously delivered by Pacific Power. Accordingly, all of the electrical components included in the list of facilities transferred will be of no value to Columbia Rural Electric Association and will be removed and scrapped at the expense of the Club.

It would be convenient for Columbia Rural Electric Association to use very limited pieces of conduit already in place to run their conductor to two specific accounts, rather than having to retrench or bore new conduit. There is one line from Country Club road to the main golf course pump that will require Columbia Rural Electric Association to bore new conduit in order to provide electrical service. There is also another line extending through the Clubhouse parking lot which may require new conduit, although Columbia Rural Electric Association is investigating alternative options to run conductor to this facility. Columbia Rural Electric Association has estimated that the cost to bore new conduit to both the main golf course pump and the clubhouse would be only \$18,066. This is in contrast to PacifiCorp's calculation of \$24,049 for the net book value of all facilities. Please see Attachment PP DR 58 2nd Supplemental, containing Columbia Rural Electric Association's estimations sent as a

follow-up to Mr. Mullins' discussion.