

**Exh. KMH-6  
Dockets UE-230172 and UE-210852  
Witness: Kristen M. Hillstead**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PACIFICORP d/b/a PACIFIC POWER  
AND LIGHT COMPANY,**

**Respondent.**

**DOCKETS UE-230172 and  
UE-210852 (Consolidated)**

**In the Matter of**

**ALLIANCE OF WESTERN ENERGY  
CONSUMERS'**

**Petition for Order Approving Deferral of  
Increased Fly Ash Revenues**

**EXHIBIT TO TESTIMONY OF**

**KRISTEN M. HILLSTEAD**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*Response to Staff Data Request No. 115*

**September 14, 2023**

UE-230172 / PacifiCorp  
July 28, 2023  
WUTC Data Request 115

**WUTC Data Request 115**

**COS/Rate Spread/Rate Design** - At RMM-1T at 21:10- 22:8, please provide all studies, exhibits, and work papers that support the company's statement that tiered rates have perverse incentives.

**Response to WUTC Data Request 115**

Please refer to the direct testimony of Company witness, Robert M. Meredith. The Company does not have additional supporting studies, exhibits, or work papers.

PREPARER: Robert M. Meredith

SPONSOR: Robert M. Meredith