

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	DOCKET UE-161204
)	
Complainant,)	
)	
v.)	
)	
PACIFIC POWER & LIGHT COMPANY,)	
)	
Respondent.)	
)	
_____)	

**EXHIBIT NO. MPG-3
PP'S RESPONSE TO CREA DATA REQUEST 0040**

April 21, 2017

UE-161204 / Pacific Power & Light Company
April 18, 2017
CREA Data Request 0040

CREA Data Request 0040

Refer to Exh. No. RBD-1T at 5:23. Please define what Mr. Dalley means by “cherry-pick[ing].” Please describe each and every instance Pacific Power is aware of in which a neighboring utility has “cherry-picked” one of its customers, including: (1) the year; (2) the type of customer (residential, commercial, or industrial); (3) how Pacific Power determined that the customer was “cherry-picked”; and (4) how Mr. Dalley learned of each instance. Additionally, if any of the cited instances involved a neighboring utility other than Columbia REA, please so indicate.

Response to CREA Data Request 0040

“Cherry-picking” occurs when a neighboring utility targets and solicits specific customers in an area that is traditionally served by another utility. The practice was addressed by Chairman Danner in a Separate Statement (Order 05, Docket UE-143932).

Please refer to the Company’s annual net removal reports, filed in Docket UE-007134, for instances in which customers have requested permanent disconnection for the purpose of connecting with another utility. Pacific Power has not performed an in-depth analysis of all permanent disconnections to determine whether the disconnection was requested as a result of “cherry-picking.”

PREPARER: Ariel Son

SPONSOR: R. Bryce Dalley