# **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-5**

# PP'S RESPONSES TO BOISE DATA REQUESTS 0039 AND 0040 AND CREA DATA REQUEST 007

**April 21, 2017** 

Exhibit No. MPG-5 Docket UE-161204

Witness: Michael P. Gorman Page 1 of 3

UE-161204 / Pacific Power & Light Company March 3, 2017 Boise 3<sup>rd</sup> Set Data Request 0039

#### **Boise Data Request 0039**

Has the Company conducted any customer satisfaction or similar type of surveys for customers in Washington? If yes, please provide copies of, and underlying data collected from, all such surveys conducted between calendar years 2013 and 2016 (inclusive – please also consider all subsequent date ranges to be inclusive).

#### Response to Boise Data Request 0039

The Company objects to this request as not reasonably calculated to lead to the discovery of admissible evidence. Further, it calls for the production of proprietary and otherwise confidential customer data. Subject to and without waiving these objections, Pacific Power provides the following.

The Company conducts customer satisfaction research among its residential customers, small / mid-size business customers, and large industrial and commercial key accounts. Three independent market research firms are hired to conduct the customer satisfaction research: J.D. Power, Market Strategies International, and TQS Research.

PREPARER: N/A

SPONSOR: N/A

Exhibit No. MPG-5 Docket UE-161204

Witness: Michael P. Gorman

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UE-161204 / Pacific Power & Light Company March 3, 2017 Boise 3<sup>rd</sup> Set Data Request 0040

## **Boise Data Request 0040**

Please identify all instances where an employee of the Company, with a position of Vice President or higher, has made an in-person visit to a Washington Schedule 48 customer between calendar years 2012 and 2016.

## Response to Boise Data Request 0040

The Company objects to this request as not reasonably calculated to lead to the discovery of admissible evidence.

PREPARER: N/A

SPONSOR: N/A

Exhibit No. MPG-5 Docket UE-161204

Witness: Michael P. Gorman

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UE-161204 / Pacific Power & Light Company March 13, 2017 CREA Data Request 007

#### **CREA Data Request 007**

Please provide the following with respect to Pacific Power's Washington service territory for each of the last five years:

- a. SAIDI;
- b. SAIFI;
- c. CAIDI.

#### Response to CREA Data Request 007

The Company objects to this response as not reasonably calculated to lead to the discovery of admissible evidence.

PREPARER: N/A

SPONSOR: N/A