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September 11, 2015

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

Rayne Pearson
Administrative Law Judge
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
Olympia, Washington 98504-7250
rpearson@utc.wa.gov

RE: **Docket UE-143932**
Pacific Power & Light Company's Response to Bench Request Nos. 1 and 2

Pacific Power & Light Company, a division of PacifiCorp (Pacific Power or Company), encloses for filing an original and four copies of its responses to Bench Request Nos. 1 and 2, including one attachment.

Please contact me with any questions at (503) 813-6389 or Bryce.Dalley@PacifiCorp.com.

Sincerely,

A handwritten signature in black ink that reads "R. Bryce Dalley" with a stylized flourish at the end.

R. Bryce Dalley
Vice President, Regulation

Enclosures

cc: Service List UE-143932

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.

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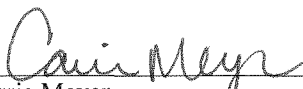
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DATED at Portland, OR this 11th of September, 2015.



Carrie Meyer
Supervisor, Regulatory Operations

Bench Request 1

Please identify the instances where the Company abandoned or transferred facilities in lieu of removal when a customer requested permanent disconnection, noting whether the Company sought to preclude subsequent use of those facilities by another electric service provider.

Response to Bench Request 1

Please see Attachment Bench Request 1, which includes a list of the permanent disconnection requests from 2002 to present where facilities were abandoned or transferred. The Company has also included clarification on whether the facilities were located in the public right-of-way or on private property

The Company previously indicated that a bill of sale associated with the permanent disconnection request for the City of Walla Walla water plant included a statement prohibiting another electric service provider from using the facilities. The original bill of sale presented to the City included that provision. However, in the process of responding to this Bench Request, the Company located correspondence in which the City refused to agree to the prohibition of future use by another electric service provider and stated it would pursue condemnation if the Company did not agree to the terms as presented by the City. In light of the terms of the franchise agreement and possible condemnation proceedings, the Company agreed to remove the disputed provision from the bill of sale.

UE-143932 / Pacific Power Light Company
Attachment Bench Request 1

Work Order or Request #	Customer	Bills of Sale	In Public Right-Of-Way	On Private Property	Date of Request	Customer Type	Nature of Request	Date of Estimate	Date of Removal
5804651	Customer A		1	1	07/22/13	Residential	Remove Pacific Power facilities so customer can be served by Columbia REA	07/26/13	12/19/13
5710308	Customer B	1		1	10/12/12	Commercial	Remove Pacific Power facilities so customer can be served by Columbia REA	10/12/12	02/06/13
5655747	Customer C			1	04/18/12	Commercial	Remove Pacific Power facilities so customer can be served by Columbia REA.	05/10/12	01/11/13
5650326	Customer D		1	1	04/02/12	Commercial	Remove Pacific Power facilities so customer can be served by Columbia REA.	05/08/12	06/15/12
5637966	Customer E			1	02/24/12	Irrigation	Remove Pacific Power facilities so customer can be served by Columbia REA.	03/27/12	04/16/12
DWAL/2011/C/DRK/5510097	Customer F		1		01/12/11	Developer	Remove subdivision backbone	02/14/11	06/01/11
DWAL/2011/C/D M9/5522459	Customer D	1	1		02/23/11	Nonresidential	Remove Pacific Power facilities so customer can be served by Columbia REA.	08/03/11	10/06/11

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Attachment Bench Request 1

Work Order or Request #	Customer	Bills of Sale	In Public Right-Of-Way	On Private Property	Date of Request	Customer Type	Nature of Request	Date of Estimate	Date of Removal
DWAL/2011/C/DRK/5533445	Customer G			1	03/31/11	Commercial	Remove Pacific Power facilities so customer can be served by Columbia REA.	05/12/11	07/19/11
DWAL/2011/C/DRK/5531940	Customer H			1	03/28/11	Irrigation	Remove Pacific Power facilities so customer can be served by Columbia REA.	04/25/11	05/25/11
WO 5403149	Customer I			1	02/24/10	Residential	Remove Pacific Power facilities so customer can be served by Columbia REA.	03/01/10	04/21/10
WO 5407744	Customer J			1	02/09/10	Irrigation	Remove Pacific Power facilities so customer can be served by Columbia REA.	03/01/10	04/21/10
WO 5403148	Customer J			1	02/24/10	Commercial	Remove Pacific Power facilities so customer can be served by Columbia REA.	03/01/10	04/22/10
WO 5403150	Customer I			1	01/12/10	Commercial	Remove Pacific Power facilities so customer can be served by Columbia REA.	01/29/10	03/17/10

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Attachment Bench Request 1

Work Order or Request #	Customer	Bills of Sale	In Public Right-Of-Way	On Private Property	Date of Request	Customer Type	Nature of Request	Date of Estimate	Date of Removal
WO 5393881	Customer K			1	10/15/09	Non-residential	Remove Pacific Power facilities so customer can be served by another utility provider.	10/19/09	11/04/09
DWAL/2008/C/D M9/5205175	Customer L		1		06/02/08	Non-residential	Remove Pacific Power facilities so customer can be served by Columbia REA.	07/19/08	08/20/08
DWAL/2008/C/D M9/5191207	Customer M			1	07/09/08	Non-residential	Remove Pacific Power facilities so customer can be served by Columbia REA.	07/11/08	08/05/08
DWAL/2008/C/D M9/5206603	Customer N		1	1	10/26/07	Residential	Remove Pacific Power facilities so customer can be served by Columbia REA.	01/17/08	05/21/08
DWAL/2008/C/D M9/5106234	Customer O		1	1	08/03/06	Residential	Remove Pacific Power facilities so developer could build subdivision. Subdivision will be served by Columbia REA.	01/18/08	06/06/08
DWAL/2005/C/D M9/2619714	Customer P		1	1	03/16/05	Non Residential	Remove Pacific Power facilities so developer can build 175 lot subdivision.	04/11/05	04/14/05

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September 11, 2015
Bench Request Data Request 2

Bench Request 2

Provide the date on which Pacific Power & Light Company's ("Pacific Power" or the "Company") policy for permanent disconnection changed to no longer include the sale and transfer of facilities in lieu of removal.

Response to Bench Request 2

On or about March 9, 2015, Pacific Power implemented its policy prohibiting offering a customer requesting permanent disconnection the option of purchasing underground facilities in lieu of removal of those facilities. The policy is the result of a Pacific Power's assessment of data, accumulated since the Commission approved the net removal tariff in 2002, demonstrating the operational and safety issues arising from a customer requesting permanent disconnection.