

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND	)	
TRANSPORTATION COMMISSION,	)	
	)	
Complainant,	)	
	)	
v.	)	Docket No. UE-161204
	)	
PACIFIC POWER & LIGHT COMPANY,	)	
	)	
Respondent.	)	
_____	)	

**EXHIBIT NO. RW-2  
PACIFIC POWER'S RESPONSE TO YAKAMA POWER DATA REQUESTS 01-06**

**April 21, 2017**

UE-161204 / Pacific Power & Light Company  
April 19, 2017  
Yakama Power Data Request 01

### **Yakama Power Data Request 01**

Refer to Exh. No. RBD-1T at 5:3-4, where Mr. Dalley explains that the proposed Stranded Cost Recovery fee for non-residential customers would be “equal to 4.5 times the customer’s annual revenue”. Please explain or describe:

- a. what 12-month period will be used to determine the customer’s annual revenue (i.e, what determines the starting month and ending month for purposes of calculating the annual revenue to use against the 4.5 times multiplier)?
- b. does the Company propose to use the 4.5x multiplier against revenues received from the customer for:
  1. Bill assistance program support?
  2. City utility taxes or other state or local franchise fees or right-of-way usage taxes (if applicable)?
  3. Late payment or interest charges during the sample year?

### **Response to Yakama Power Data Request 01**

- a. The 12-month period will be the 12 full months immediately prior to the customer’s request to permanently disconnect.
- b.
  1. No.
  2. No.
  3. No.

PREPARER: Mike Zimmerman

SPONSOR: R. Bryce Dalley

UE-161204 / Pacific Power & Light Company  
April 19, 2017  
Yakama Power Data Request 02

### **Yakama Power Data Request 02**

Refer to the commercial bill example provided in Attachment CREA 001 to Pacific Power's Response to CREA data request 001. Please calculate and describe the proposed Stranded Cost Recovery Fee for a non-residential customer assuming the example bill was repeated for an entire year (i.e., a Schedule 36 customer with annual revenue equal to twelve (12) times the amounts on the sample commercial bill in Attachment CREA 001).

### **Response to Yakama Power Data Request 02**

The Stranded Cost Recovery Fee will include the annual revenues received for the Basic Charge, the Demand Charge, the Energy Charge and the Reactive Power Charge for total annual revenues of \$27,060.60. These annual revenues are multiplied by 4.5 to calculate a total Stranded Cost Recovery Fee of \$121,772.70. Please refer to Attachment Yakama Power 02.

PREPARER: Mike Zimmerman

SPONSOR: TBD

UE-161204 / Pacific Power & Light Company  
April 19, 2017  
Yakama Power Data Request 03

### **Yakama Power Data Request 03**

Does the Company intend to impose the Stranded Cost Recovery Fee against customers served under outdoor area lighting schedules such as Washington Schedule 15N? If so, will the Stranded Cost Recovery fee be the \$6,153 amount proposed for residential customers or the 4.5 times annual revenue proposed for non-residential customers?

### **Response to Yakama Power Data Request 03**

The Company intends for Schedule 15N customers to pay the non-residential Stranded Cost Recovery Fee of 4.5 times annual revenue for customers who permanently disconnect.

PREPARER: Mike Zimmerman

SPONSOR: TBD

UE-161204 / Pacific Power & Light Company  
April 19, 2017  
Yakama Power Data Request 04

**Yakama Power Data Request 04**

Refer to Pacific Power's Response to CREA data request 002. Please explain whether the Company's response is the same or different if:

- a. the customer location is on Trust Land leased by the customer from the BIA and such lease has expired?
- b. all or a portion of the Company's facilities needed to serve a future customer are located on Trust Land and the Company does not have a direct easement or right-of-way authorization from the BIA to serve such location?

If the Company's response differs from its response to CREA data request 002, please describe why.

**Response to Yakama Power Data Request 04**

- a. The Company's response is the same.
- b. The Company's response is the same.

PREPARER: Toby Freeman

SPONSOR: TBD

UE-161204 / Pacific Power & Light Company  
April 19, 2017  
Yakama Power Data Request 05

**Yakama Power Data Request 05**

Without identifying any customer-specific information, please provide a list of all customer requested disconnection agreements proposed by the Company since 2006 for one of its customers located on the Reservation or Trust Land. For each such agreement, please specify the following:

- a. the date such agreement was offered by the Company to the customer;
- b. the date each customer executed such agreement;
- c. the total amounts received by the Company pursuant to such agreement(s); and,
- d. whether the actual costs associated with each agreement were less than or exceeded the advance deposit required by each agreement.

**Response to Yakama Power Data Request 05**

There were no requests from 2006 through 2014.

2015

- a. Customer 1: January 6, 2015.  
Customer 2: October 13, 2015.
- b. Agreements were never executed by the customers.
- c. N/A
- d. N/A

2016

- a. Customer 1: September 16, 2016.  
Customer 2: June 1, 2016.  
Customer 3: May 31, 2016.
- b. Agreements were never executed by the customers.
- c. N/A
- d. N/A

PREPARER: Melissa Nottingham

SPONSOR: TBD

UE-161204 / Pacific Power & Light Company  
April 19, 2017  
Yakama Power Data Request 06

**Yakama Power Data Request 06**

Without identifying any customer-specific information, please provide all documents from the BIA or any other entity authorizing the Company to construct, operate and maintain a service line or other facilities serving the Trust Land tract known as Allotment T-620 Lease 5-2-3050-1317 located within Section 36, Township 11 N., Range 16 E. Willamette Meridian, Yakama County, State of Washington. In addition, please:

- a. describe the Company's understanding of how long it believes it has authorization to serve this Trust Land tract; and,
- b. provide all documents between the Company and the BIA relating to the Company's ongoing ability to provide service to this Trust Land tract.

**Response to Yakama Power Data Request 06**

The Company objects to this request on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, the Company responds as follows:

The Company does not have the ability to research its records based on allotment tract designation.

PREPARER: Mike Paulson

SPONSOR: TBD