

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

PACIFICORP dba  
PACIFIC POWER & LIGHT COMPANY,

Respondent.

DOCKET UE-230172  
*(Consolidated)*

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In the Matter of

ALLIANCE OF WESTERN ENERGY  
CONSUMERS'

Petition for Order Approving Deferral of  
Increased Fly Ash Revenues

DOCKET UE-210852  
*(Consolidated)*

RESPONSE TESTIMONY OF BRADLEY

T. CEBULKO

ON BEHALF OF THE ENERGY

PROJECT EXHIBIT BTC-3

*PacifiCorp Response to The Energy  
Project Data Request 031: Performance  
Measures*

**TEP Data Request 031**

**Performance Measures - MDM-1T at 30:8-12** - In MDM-1T at 30:8-12, Witness McVee testifies that the Company is not proposing to adopt the Commission's energy burden measures because it "does not readily track" energy burden and customer information by census tract and would have to hire an outside contractor thereby incurring additional expense.

- (a) Has the Company identified the cost of hiring an outside contractor for collecting, measuring, and reporting this information? If yes, what is the Company's assumed annual cost for each year of the proposed rate plan?
- (b) Please provide the Company's RFQ, or other relevant solicitation, for an outside contractor to provide services to measure energy burden by census tract.
- (c) Please provide all responses to the Company's RFQ, or other relevant solicitation, for an outside contractor to provide services to measure energy burden by census tract.

**Response to TEP Data Request 031**

- (a) No. The Company has not identified the cost of hiring an outside contractor for collecting, measuring, and reporting this information.
- (b) The Company has not issued a request for quotes (RFQ) to do this work.
- (c) Not applicable.

PREPARER: Robert M. Meredith

SPONSOR: Robert M. Meredith