

UE-161204 / Pacific Power & Light Company

May 1, 2017

CREA Data Request 0043

### **CREA Data Request 0043**

Refer to Exh. No. RBD-1T at 9:19. Please identify by reference to national standard, state regulation, local practice or Pacific Power policy the prohibition on abandoning or allowing empty electrical conduit to remain in the ground where wire and facilities have been removed, including: (1) circumstances since 2001 where such conduit has been abandoned in place; (2) the type of customer (residential, commercial or industrial) receiving electrical service; (3) whether such conduit was filled with material or obstruction in order to prohibit its future use; and (4) the address where the conduit was abandoned.

### **Response to CREA Data Request 0043**

The Company objects to this request on the grounds that it is both unintelligible as a result of the testimony reference and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving this objection, please see Order 03 in Docket UE-143932. The Commission found that abandoning empty conduit in place and transferring its ownership to a departing customer neither violates the National Electric Safety Code (NESC) nor places a burden on the Company to maintain it in perpetuity.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

Despite PacifiCorp's diligent efforts, certain information protected from disclosure by attorney-client privilege or other applicable privileges or law may have been included in response to these data requests. Accordingly, PacifiCorp reserves its right to seek the return of any privileged or protected materials that may have been inadvertently disclosed, and respectfully advise that any inadvertent disclosure should not be considered a waiver of any applicable privileges or rights. PacifiCorp respectfully requests that you inform PacifiCorp immediately if you become aware of any such materials in these responses.