



February 24, 2017

**VIA EMAIL**

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**RE: Docket UE-161204—Pacific Power’s First Set of Data Requests to Columbia Rural Electric Association**

Pacific Power & Light Company (Pacific Power or Company), a division of PacifiCorp, submits the following first set of data requests to Columbia Rural Electric Association (Columbia REA). Responses to these requests are due within 10 business days of service of this request or by March 10, 2017. Pacific Power waives paper service for non-confidential material.

Please send responses by electronic mail to:

Dustin Till  
Senior Attorney  
Pacific Power  
825 NE Multnomah Street  
Suite 1800  
Portland, OR 97232  
[dustin.till@pacificcorp.com](mailto:dustin.till@pacificcorp.com)

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1420 Fifth Ave. Suite 3400  
Seattle, WA 98101  
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PacifiCorp Washington Dockets  
825 NE Multnomah Street  
Suite 2000  
Portland, OR 97232  
[WashingtonDockets@pacificcorp.com](mailto:WashingtonDockets@pacificcorp.com)

Please direct any informal inquiries regarding these data requests to me at (503) 813-6589.

Sincerely,

Dustin Till  
Senior Attorney

Enclosures

cc: Service List in Docket UE-161204

BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

vs.

PACIFIC POWER & LIGHT COMPANY,

Respondent.

Docket No. UE-161204

PACIFIC POWER'S FIRST SET OF  
DATA REQUESTS TO COLUMBIA  
RURAL ELECTRIC ASSOCIATION

YOU ARE HEREBY SERVED with the Pacific Power's First Set of Data Requests. Please provide answers under oath, within ten (10) business days of service.

**DEFINITIONS**

1. These requests call for "data" as that term is defined in WAC 480-07-400, specifically information of any type, in any form. Each and every request calls for "data" that is known or available to you, including all data in the possession of your agents, attorneys, accountants, auditors, experts, or any other person acting on your behalf.

2. Consistent with the definition of "data," when used herein, the term "document" means and includes, but is not limited to, any printed, typewritten, or handwritten matter of whatever character, and every other form of recording upon any tangible thing, regardless of whether maintained in hard-copy or electronic format. Further, "document" includes every copy which contains any variation from the original, such as handwritten notations. Finally, the term "document" includes all appendices or attachments.

3. When used with respect to a document, the term "identify" requires you to provide the following information:

- a. Title;
- b. Date of preparation;
- c. Date appearing on the document if other than the date of preparation;
- d. Nature of the document;
- f. Subject matter;

- g. Number of pages;
- h. Authors;
- i. Recipients;
- j. Current custodian; and
- k. Current location.

When used with respect to a person, “identify” requires you to provide the following information:

- a. Full name;
  - b. All known telephone numbers;
  - c. All known addresses;
  - d. Employers; and
  - e. Positions held with each employer.
4. When used herein “you” and “Columbia REA” refer to Columbia Rural Electric Association, as well as any of its employees, agents or representatives.
5. The word “person” includes the plural as well as the singular and includes any natural person, firm, association, partnership, corporation, or other form of legal entity.
6. The term “Commission” refers to the Washington Utilities and Transportation Commission.

## INSTRUCTIONS

1. If you are asserting that part of any response to a data request is privileged, specify the grounds therefore, “identify” the alleged privileged documents or information, and provide all responsive information or documentation which does not fall within your claim of privilege.
2. The singular number and the masculine gender as used herein shall embrace, and be read and applied as, the plural or the feminine or the neuter, as the circumstances may make appropriate.
3. If you cannot answer a data request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you cannot answer the data request in full, and state what information or knowledge you have concerning the unanswered portions.
4. If any document requested herein is unavailable, fully “identify” that document and state the reasons why it is unavailable and “identify” the last known custodian.

### **DATA REQUESTS**

1. Please provide copies of all written communications between Columbia REA and any former or current customers of Pacific Power regarding offers to, or solicitation of, potential retail electric service customers/members.
2. Please provide all Electric Service Agreements, contracts, and other forms of written agreements between Columbia REA and former or current customers of Pacific Power.
3. Please provide copies of all print advertisements and other written forms of solicitation of potential customers/members, used by Columbia REA in the State of Washington.
4. If Columbia REA has ever stated that it will be responsible for costs charged by Pacific Power, to a current or prospective customer/member of Columbia REA, for removal of Pacific Power's facilities, set forth the following:
  - a. The individuals who participated in each communication;
  - b. The date of each communication;
  - c. The particular substance of each communication; and
  - d. Whether such communication was in any way memorialized in written form and, if so, identify the document.
5. Please produce the minutes and any other recording of the meetings of the Columbia REA Board of Directors during which Pacific Power and/or customers of Pacific Power were addressed in any way.
6. Please identify the current members of the Columbia REA Board of Directors.
7. Please identify the former members of the Columbia REA Board of Directors, dating back to January 1, 1998.
8. When Columbia REA is required to extend a line and/or install facilities on a property of a new customer/member in order to provide electric service to that new member, is the cost of doing so in any way allocated or assessed to other Columbia REA customer/members?
9. If your answer to Data Request No. 8 is "yes", please describe in detail how those costs are allocated or assessed to other Columbia REA customers/members.

10. Please produce all business development plans or other documents in any way referencing efforts by Columbia REA to encourage customers of Pacific Power to become customers/members of Columbia REA.
11. Please identify the Columbia REA representative(s) currently responsible for new customer/member development in Walla Walla County.
12. Does Columbia REA comply with the State of Washington's renewable portfolio standards requirements, conservation acquisition standards, and the Clean Air Rule?
13. If your answer to Data Request No. 12 is "yes", please state the date of initial compliance and identify the corresponding standard or rule.
14. Does COLUMBIA REA have access to preference power from Bonneville Power Administration?
15. If your answer to Data Request No. 14 is a "yes," please provide all contracts, agreements, and other documents relating to the terms and conditions of Columbia REA's purchases from the Bonneville Power Administration.
16. Does Columbia REA have access to grants, tax-free bonds, or low-interest loans from Federal or non-profit organizations, to further its business interests?
17. If your answer to Data Request No. 16 is "yes", for each grant, bond or loan received since January 1, 1998, please state:
  - a. The provider;
  - b. The amount;
  - c. The other terms;
  - d. The date provided; and
  - e. Your specific use of the funds.

18. Does Columbia REA offer a low income bill assistance program, a low income weatherization program, or energy assistance to its customers?
19. If your answer to Data Request No. 18 is “yes”, for each program or means of assistance please state:
  - a. The date it was first available to customers;
  - b. The terms; and the total savings realized by your customers.