

**PUBLIC COUNSEL DATA REQUEST PC-1 TO CREA:**

PC-1. Please provide a description of the following programs sponsored by CREA, including the data requested below for 2014-2016, on both a budgeted and actual basis. If final data for 2016 is not yet available, please provide the most up-to-date data now and the remaining data when available. In addition to any reference to CREA's tariff or published statement of rates, if any, please also identify the sources of revenue and cost allocation mechanism relied upon to fund each program:

- a. Low-Income Assistance Program
  - i. Total dollar amount of funding provided for the last three years (2014-2016).
- b. Conservation Program
  - i. Total dollar amount by rate class on a both a budgeted basis and an actual basis for last three years (2014-2016).
  - ii. Total Savings in kWh achieved by rate class on both a budgeted basis and an actual basis for the last three years (2014-2016).
- c. Energy Efficiency Program.
  - i. Total dollar amount by rate class on a both a budgeted basis and an actual basis for last three years (2014-2016).
  - ii. Total Savings in kWh achieved by rate class on both a budgeted basis and an actual basis for the last three years (2014-2016).

**RESPONSE TO PUBLIC COUNSEL DATA REQUEST PC- 1:**

Columbia Rural Electric Association ("CREA") objects to Public Counsel Data Request No. PC-1 on the basis that the information requested is not relevant to the "primary issue in this proceeding [which] relates to the rates, terms, and conditions of [Pacific Power's] proposed tariff filings"<sup>1/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

- a. Please see CREA's response to Pacific Power Data Request 18. Through the Blue Mountain Action Council ("BMAC"), CREA's low-income members receive financial assistance with their electricity bills. CREA receives checks covering these members' electricity bills directly from BMAC; however, CREA does not track whether a bill was paid by the member or by BMAC and, therefore, does not have information on the amount of financial assistance BMAC has provided during the period requested.

---

<sup>1/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

In addition to support through BMAC, CREA provides assistance to its low-income members through rate reductions for these members. During the period requested, CREA provided \$10,873 in rate assistance for its low-income members.

- b. Please see CREA's response to Pacific Power Data Request 012. Please also see Attachment A to CREA's Response to Public Counsel Data Request PC-1. During the period requested, CREA spent \$793,028.00 on conservation and achieved 28,576,106 KWhs in energy savings.
- c. Please see the above response. CREA does not distinguish between conservation and energy efficiency.