

**PUBLIC COUNSEL DATA REQUEST PC-2 TO CREA:**

**PC-2. Re: Low-Income Rate Assistance Programs**

Please confirm whether or not any customers who qualify for CREA's low-income programs have switched their electric service from Pacific Power to CREA? If confirming, please provide a count of the customers qualifying for low-income rate assistance who have acquired electric service from CREA after departing Pacific Power's system during the last three years, 2014-2016. If final data for 2016 is not yet available, please provide the most up-to-date data now and the remaining data when available.

**RESPONSE TO PUBLIC COUNSEL DATA REQUEST PC- 2:**

CREA objects to Public Counsel Data Request No. PC-2 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>2/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

No customers who qualify for CREA's low-income programs have switched their electric service from Pacific Power to CREA. Although residential customers switch their service to CREA each year, CREA's residential rates are higher than Pacific Power's. CREA does not have any direct knowledge of the circumstances that influence a low-income customer to choose to stay with their existing provider or to switch providers, but CREA assumes that cost is a driving factor for these customers and that this factor trumps other benefits of CREA membership, including a member-focused service, local control, and an ownership interest in the cooperative.

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<sup>2/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

Date: March 28, 2017  
Respondent: Scott Peters  
Witness: Les Teel