

UE-161204 / Pacific Power & Light Company  
March 31, 2017  
Boise 5<sup>th</sup> Set Data Request 0062

### **Boise Data Request 0062**

Refer to Exh. RBD-1T at 4:20-23, where Mr. Dalley testifies concerning alleged “in-person visits to businesses” by Columbia REA in Walla Walla and Columbia counties since 1999:

- a. Please provide a narrative response detailing “in-person visits to businesses” by Pacific Power in Walla Walla and Columbia counties since 1999;
- b. If the Company objects to the request in Boise Data Request 0062(a) on any relevance related grounds, please explain why Mr. Dalley’s testimony on alleged “in-person visits to businesses” by Columbia REA in Walla Walla and Columbia counties is relevant, while in “in-person visits to businesses” by Pacific Power in Walla Walla and Columbia counties are not; and
- c. If the Company objects to the request in Boise Data Request 0062(a) on any overly burdensome related grounds, please limit the response to the criteria specified in Boise Data Request 0040, i.e., “all instances where an employee of the Company, with a position of Vice President or higher, has made an in-person visit to a Washington Schedule 48 customer between calendar years 2012 and 2016.”

### **Response to Boise Data Request 0062**

- a. The Company objects to this data request on the grounds that it is unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. In addition, the Company objects to the mischaracterization of Mr. Dalley’s testimony. Subject to and without waiving this objection, Pacific Power responds as follows:

The referenced portion of Mr. Dalley’s testimony describes in-person visits to businesses by Columbia REA for the purpose of soliciting Pacific Power customers.

Pacific Power performs in-person visits to its customers for numerous reasons, including but not limited to: meter tests, safety concerns, outage or service quality issues, managed accounts, etc. Pacific Power does not perform in-person visits to solicit new customers.

- b. Pacific Power’s in-person visits are to existing Pacific Power customers, and are not conducted for the purpose of soliciting new business from customers of other electric service providers. The in-person visits referenced in Mr. Dalley’s testimony describe in-person visits by Columbia REA for the purpose of soliciting Pacific Power customers.

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.

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c. Please refer to PacifiCorp's Response to Boise Data Request 0040.

PREPARER: Bill Clemens

SPONSOR: R. Bryce Dalley

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