

UE-161204 / Pacific Power & Light Company  
April 14, 2017  
Boise 6<sup>th</sup> Set Data Request 0070

**Boise Data Request 0070**

Refer to Exh. RBD-1T at 8:1-6, where Mr. Dalley testifies concerning rates and tariffs associated with Pacific Power and non-regulated utilities, including discussion related to the Bonneville Power Administration (“BPA”) and the Washington Utilities and Transportation Commission (“Commission”):

- a. Please confirm that Commission-approved Tariff WN U-75, Schedule 98 (Third Revision of Sheet 98.1) (“Schedule 98”), as signed by Mr. Dalley, is currently effective;
- b. Please confirm that Schedule 98 was filed to reinstate the Residential Exchange Program (“REP”) of the BPA;
- c. Please confirm that Pacific Power takes part in the REP;
- d. Please confirm that the REP passes the benefits of the BPA’s power system to Pacific Power customers;
- e. Please confirm that the costs of the REP are paid by BPA’s customers;
- f. Please confirm that Schedule 98 provides Pacific Power customers with a direct pass through of monetary benefits received from the BPA; and
- g. If the Company does not confirm any of the foregoing subparts to Boise Data Request 0070, or if Pacific Power believes that additional context or explanation would further the purposes of discovery, please explain.

**Response to Boise Data Request 0070**

- a. Confirmed.
- b. The Third Revision of Sheet 98.1 was filed on August 25, 2015 to update Schedule 98 rates to reflect the benefits calculated by Bonneville Power Administration (BPA) using the final, approved rates from the Company’s FY2016-2017 Average System Cost filing and BPA’s BP-16 rate case. With the clarification that the 2015 filing of Schedule 98 was to “update” and not “reinstate” the REP, this statement is confirmed.
- c. Confirmed.
- d. Confirmed
- e. PacifiCorp objects to this subpart because the phrase “costs of the REP” is vague, undefined, and subject to numerous interpretations. PacifiCorp

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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also objects to this subpart because it seeks information not in PacifiCorp's possession, custody, or control. Subject to and without waiving these objections, PacifiCorp answers as follows. BPA's implementation of the REP, including how REP costs are allocated, is governed by a complex statutory, regulatory, and legal framework, including section 5(c) of the Pacific Northwest Electric Power Planning and Conservation Act, 16 U.S.C. § 839c(c), and the 2012 Residential Exchange Settlement Agreement. Among many other requirements, BPA is statutorily required to develop rates that are based on its total system costs. 16 U.S.C. § 839e(a)(2)(B). BPA adopted its current rates (BP-16) in a July 2015 Record of Decision (available at <https://www.bpa.gov/news/pubs/RecordsofDecision/rod-20150723-BP-16-Rate-Proceeding.pdf>). PacifiCorp has not independently analyzed whether REP costs (if any) are included in BPA's current rates.

f. Confirmed.

g. See above.

PREPARER: Natasha Siores

SPONSOR: R. Bryce Dalley

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