

UE-161204 / Pacific Power & Light Company  
March 23, 2017  
CREA Data Request 0032

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Please refer to the direct testimony of R. Bryce Dalley, page 11, lines 6-7. How common are circumstances that cause reliability and/or safety concerns?

**Response to CREA Data Request 0032**

Pacific Power objects to this request on the ground that it is vague. Additionally, the Company lacks knowledge or information sufficient to respond regarding the frequency of future "circumstances." Subject to and without waiving the objection, the Company does not anticipate often encountering reliability and/or safety concerns in the event of a permanent disconnection, provided the departing customer purchases and the new electric service provider utilizes the facilities or they are removed. The subject portion of the proposed revisions of the tariffs is simply intended to afford the Company the flexibility to efficiently address a unique circumstance.

PREPARER: R. Bryce Dalley

SPONSOR: R. Bryce Dalley

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