

PACIFIC POWER DATA REQUEST NO. 1 TO CREA:

Please provide copies of all written communications between Columbia REA and any former or current customers of Pacific Power regarding offers to, or solicitation of, potential retail electric service customers/members.

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 1:

CREA objects to Pacific Power Data Request No. 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”^{1/} and is not reasonably calculated to lead to the discovery of admissible evidence. CREA further objects to Pacific Power Data Request No. 1 on the basis that the request is unreasonably burdensome and vague. Without waiving the foregoing objections, CREA responds as follows:

CREA does not solicit Pacific Power customers through written communication. In 2011, CREA produced a series of radio advertisements that could be construed as solicitation; however, those advertisements were discontinued soon thereafter. As part of its member-oriented focus, CREA maintains open lines of communication with its existing members, which can include information on its rates and terms of service to current members who may also be served by other utilities, including Pacific Power. An example of such communications is the email from Scott Peters to the City of College Place, which was included in Pacific Power’s response to WUTC Data Request 3, Attachment WUTC 3.

^{1/} Order 04 ¶ 12 (Jan. 4, 2017).

Date: March 10, 2017
Respondent: Scott Peters
Witness: Les Teel

PACIFIC POWER DATA REQUEST NO. 4 TO CREA:

If Columbia REA has ever stated that it will be responsible for costs charged by Pacific Power, to a current or prospective customer/member of Columbia REA, for removal of Pacific Power's facilities, set forth the following:

- a. The individuals who participated in each communication;
- b. The date of each communication;
- c. The particular substance of each communication; and
- d. Whether such communication was in any way memorialized in written form and, if so, identify the document.

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 4:

CREA objects to Pacific Power Data Request No. 4 as unduly burdensome. CREA further objects 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"^{4/} and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

CREA has stated that it will be responsible for costs charged by Pacific Power to a current or prospective member in association with the removal of Pacific Power's facilities. CREA's understanding of the purpose of the costs to permanently disconnect and remove facilities in the Net Removal Tariff is to make the Company whole for the costs of this service, not to punish the Company's customers for leaving. As such, the source of the funding for the costs to permanently disconnect and remove a customer should be irrelevant.

^{4/} Order 04 ¶ 12 (Jan. 4, 2017).

Date: March 10, 2017
Respondent: Scott Peters
Witness: Les Teel

PACIFIC POWER DATA REQUEST NO. 23 TO CREA:

If a departing customer is only required to pay the accounting construct of net book value as opposed to the fair market value for Pacific Power's facilities, does that customer enjoy a "windfall" as that term is used in Mr. Gorman's testimony?

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 23:

No. The customer would pay effectively the same cost for use of the facilities on a net present value basis if it would have stayed with Pacific Power, or left to take service from another supplier.

PACIFIC POWER DATA REQUEST NO. 25 TO CREA:

Please refer to Exhibit No. MPG-1T, p. 15, ll. 1-2 and explain how the Company's proposal would "require departing customers to subsidize the service of remaining customers."

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 25:

Departing customers would subsidize the cost of service for remaining customers because departing customers would provide Pacific Power an exit fee that would exceed the contributions these customers would have made to Pacific Power for the cost it would have incurred to provide service to the departing customer. This profit above prevailing book value would then be used to reduce Pacific Power cost to remaining customers. That cost reduction to remaining customers is a subsidy that was paid by the departing customers' exit fees.

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Date: May 10, 2017
Respondent: Michael Gorman
Witness: Michael Gorman