Docket UE-161204 Yakama Power's Response to Pacific Power Data Request Set 1 (Nos. 01-32) May 12, 2017

PACIFIC POWER DATA REQUEST NO. 14 TO YAKAMA POWER:

If your answer to Data Request 13 is "yes", please describe in detail how those costs are allocated or assessed to other customers.

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 14:

Yakama Power objects to Pacific Power Data Request No. 14 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,"^{23/} and is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving the foregoing objections, Yakama Power responds as follows:

Yakama Power is a tribally-owned, not-for-profit electrical utility. As such, all expenses of the utility are borne by its customers, and all revenues received by the utility are the property of its customers and the Yakama Nation. The costs of the utility are recovered through the rates it charges its various member classes.

Date Response Prepared:May 12, 2017Witness:Ray WisemanPreparer:J.D. WilliamsPreparer Telephone No.:971-404-9081

^{23/} Order 04 ¶ 12 (Jan. 4, 2017).

Despite Yakama Power'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, Yakama Power 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. Yakama Power respectfully requests that you inform Yakama Power immediately if you become aware of any such materials in these responses.