

Docket UE-161204  
Yakama Power's Response to PC Data Request No. 1  
March 28, 2017

### **PUBLIC COUNSEL DATA REQUEST NO. 1:**

Please provide a description of the following programs sponsored by the Company<sup>1</sup> including the data requested below for 2014-2016, on both a budgeted and actual basis. If 2016 data is not yet available for the full year, please provide it in part now and the remaining data when it is all available. In addition to any reference to the Company's tariff, if any, please also identify the sources of revenue and cost allocation mechanism relied upon to fund each program:

- a. Low-Income Assistance Program
  - i. Total dollar amount of funding provided for the last three years (2014-2016).
- b. Conservation Program
  - i. Total dollar amount by rate class on a both a budgeted basis and an actual basis for last three years (2014-2016).
  - ii. Total Savings in kWh achieved by rate class on both a budgeted basis and an actual basis for the last three years (2014-2016).
- c. Energy Efficiency Program.
  - i. Total dollar amount by rate class on a both a budgeted basis and an actual basis for last three years (2014-2016).
  - ii. Total Savings in kWh achieved by rate class on both a budgeted basis and an actual basis for the last three years (2014-2016).

### **Response to Public Counsel Data Request No. 1:**

#### General Objection

Yakama Power objects to Public Counsel's Data Request No. 1 on the basis that: (1) the information requested is not relevant to the issues in this proceeding in that it has no bearing on the question of whether or to what degree PacifiCorp has stranded costs associated with its customers' permanent disconnection from PacifiCorp's system; (2) the request is overly broad and production of the data requested would be unreasonably burdensome and expensive; and, (3) the request is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to the foregoing objection, and in the interest of assisting with Public Counsel's analysis of Pacific's proposed rule and tariff revisions that are the subject of this proceeding, Yakama Power provides the following response to Public Counsel's Data Request No. 1.

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<sup>1</sup> For the sole purpose of responding to Public Counsel's Data Request No. 1, Yakama Power assumes that use of the term "Company" in the request is intended to refer to Yakama Power.

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.

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*General background on Yakama Power's Support of Energy Efficiency, Conservation and Low-Income Assistance Efforts.*

To fully appreciate Yakama Power's efforts with regard to funding Low-Income Assistance, Conservation, and Energy Efficiency (collectively, "LI-C-EE") Programs two general principles bear consideration. First, Yakama Power is a nonprofit tribal utility so its rates are designed only to recover the costs incurred to provide reliable electric service without the need to collect monies to produce a return on investment or profits for shareholders. Charging at-cost rates reduces the need for an expansive Low-Income Assistance program.

Second, Yakama Power is a full requirements customer of the Bonneville Power Administration ("BPA"). Thus, a portion of the monies Yakama Power pays for its wholesale power supply are used to fund BPA's Energy Efficiency Action Plan ("BPA EE Plan"), a program through which BPA and its public power utility customers (including Yakama Power) promote and fund energy efficiency and conservation efforts. The budget for BPA's EE Plan for the 2016-2019 period totals \$454.6 million for conservation purchases (including energy efficiency investments), market transformation, and conservation infrastructure.<sup>2</sup>

*Yakama Power LI-C-EE Programs.*

Yakama Power does not have formal programs dedicated to LI-C-EE activities. Instead, activities of such nature are evaluated on a case-by-case, fact-specific basis and funding acquired either through participation in BPA's EE Plan or other funding sources. Yakama Power does not maintain an ongoing, consolidated record of the type of spending and savings information described in Public Counsel's Data Request No. 1, and compiling such a record would be unduly burdensome and expensive.

**Date Response Prepared:** March 28, 2017  
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<sup>2</sup> Source: 2016-2021 BPA Energy Efficiency Action Plan  
([https://www.bpa.gov/EE/Policy/EEPlan/Documents/2016-2021\\_BPA\\_EE\\_Action\\_Plan.pdf](https://www.bpa.gov/EE/Policy/EEPlan/Documents/2016-2021_BPA_EE_Action_Plan.pdf)).

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