

STAFF DATA REQUEST NO. 4 TO CREA:

Reference Exhibit MPG-1T, page 6, lines 5-7. Mr. Gorman hypothesizes that “customers may be deciding to switch from [Pacific Power] to an alternative supplier due to a preference to work with locally owned utilities, or because of service quality issues at [Pacific Power].” Please provide:

- a. any evidence, including anecdotal evidence, indicating that customers switching to CREA are doing so because of “a preference to work with locally owned utilities;”
- b. any evidence, including anecdotal evidence, that customers switching to CREA are doing so because of “service quality issues at [Pacific Power];” and
- c. Columbia Rural Electric Association’s service interruption data for the Walla Walla and Dayton areas for 2011-2016. Please separately identify all interruptions affecting more than 50 residential customers and all interruptions affecting commercial or industrial customers.

RESPONSE TO STAFF DATA REQUEST NO.4:

- a. None. In his testimony at page 4, Mr. Gorman’s testified that he investigated the claims PP was making concerning customer switching activity but he found the Company was not able to substantiate its claims. Consequently, Mr. Gorman’s testimony was merely intended to indicate that there could be reasons other than those identified by Pacific Power for why customers have switched away from the utility, and noted that Pacific Power had not provided information in response to data requests that could substantiate or refute these alternative reasons.
- b. See response to a. above.
- c. Columbia REA objects to this request on that 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/} Without waiving this objection, Please see Attachment A to Columbia REA’s Response to Staff Data Request No. 4. Pursuant to conversations with Staff, Columbia REA has agreed to supplement this response with additional requested information by May 10, 2017.

^{1/} Order 04 ¶ 12 (Jan. 4, 2017).

Date: May 5, 2017
Respondent: Mike Gorman for Subsections a. and b.; Dave Reller for Subsection c.
Witness: Mike Gorman for Subsections a. and b.; Les Teel for Subsection c.