

**PUBLIC COUNSEL DATA REQUEST PC-1 TO BOISE:**

**PC-1. Re: Response Testimony of Bradley G. Mullins, Exhibit No. BGM-1T.**

Please refer to Exhibit No. BGM-1T, page 9, lines 13-15, which states, “From my review of the information the Company presented in this matter, it is not evident that circumstances surrounding redundant facilities are actually a problem for the Company.”

Based on this statement, please answer the following:

- a. Please provide any other documentation Mr. Mullins reviewed to determine that redundant facilities are not a problem for the Company.
- b. Does Mr. Mullins statement mean that redundant facilities are not a problem?
- c. If so, is Mr. Mullins aware of any Washington or Commission guidelines related to the prevention of redundant facilities being built?
- d. Does Mr. Mullins believe that it is not appropriate for Pacific Power to have a tariff that sets out the conditions for removing redundant facilities and recovering the cost associate with their removal?

**RESPONSE TO PUBLIC COUNSEL DATA REQUEST PC- 1:**

- a) Boise objects to this request to the extent it will not produce relevant information. Boise also objects on the basis that the data requested would be unduly burdensome and that the request is overly broad. Further, Boise objects on the basis that Public Counsel seeks information obtainable from another source that is more convenient and less burdensome—namely, from a review of publicly available information on the WUTC website, including dockets associated with the Net Removal Tariff. Moreover, Boise objects to this request to the extent that it is ambiguous because does it not offer a definition of redundant facilities, which, as Mr. Mullins discusses, is not necessarily clear. Subject to and without waiving these objections, Boise answers as follows.

Mr. Mullins has reviewed a substantial amount of discovery in this proceeding, and has not identified evidence that redundant facilities have prevented the Company from applying the Net Removal Tariff. Public Counsel has access to all of the discovery provided in this matter, and thus, can arrive at its own conclusion with respect to its review of that information. In addition, Mr. Mullins specifically identified the Company’s Responses to Boise Data Request 63 and Columbia Rural Electric Association Data Request 25, as support for his position in testimony.

- b) Mr. Mullins’ statement means that instances of redundant facilities, depending on how that term is defined, have not been demonstrated to be problematic in terms of preventing the Company from applying the Net Removal Tariff. For that reason, it is unnecessary to

PAGE 3 – BOISE RESPONSE TO PUBLIC COUNSEL’S FIRST SET OF DATA REQUESTS

Date: May 17, 2017  
Respondent: Bradley G. Mullins (503) 954-2852  
Witness: Bradley G. Mullins (503) 954-2852

state explicitly that the Net Removal Tariff applies to instances of redundant facilities because doing so introduces unnecessary ambiguity over the circumstances in which the Net Removal Tariff might apply.

For example, one may reasonably consider a residential customer installing a roof-top solar system to be receiving redundant electrical services, even though the Net Removal Tariff is not meant to apply to net metering customers.

- c) No.
- d) Mr. Mullins believes that the Net Removal Tariff would appropriately be applied to the two specific instances of redundant facilities the Company identified in discovery. Mr. Mullins' understanding, however, is that the Net Removal Tariff was applied in those instances, even though the Net Removal Tariff has not included language regarding redundant facilities in the past. Those instances informed Mr. Mullins' proposed definition of Redundant Electrical Services, if such a term is to be included in the Net Removal Tariff, as follows:

“Redundant Electrical Services: Refers to situations in which a customer simultaneously receives full requirements electric services from more than one provider at a single structure or improvement, or the portion thereof, which is electrically connected and configured for a single point of delivery.”

Date: May 17, 2017  
Respondent: Bradley G. Mullins (503) 954-2852  
Witness: Bradley G. Mullins (503) 954-2852