

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: May 9, 2017
DOCKET: UE-161204
REQUESTER: Pacific Power

WITNESS: David Panco
RESPONDER: David Panco
TELEPHONE: (360) 664-1313

3. Please refer to Exhibit No. DJP-1T, p. 8, ll. 19-21 and Mr. Panco's testimony regarding the formation of Columbia REA and set forth the following in relation to that testimony:

- A. The circumstance(s) intended to be served by the Rural Electrification Act;
- B. Whether the land within the boundaries of the City of Walla Walla is classified as "rural" by municipal, state and/or federal agencies.
- C. Whether the "developing edges of Walla Walla and College Park are classified as "rural" by municipal, state and/or federal agencies.
- D. Whether the Staff believes that Columbia REA has exceeded the charter of the Rural Electrification Act by actively seeking to provide electric service within the traditional service area of Pacific Power.

Response:

- A. Staff has no expertise as to the purpose of the Rural Electrification Act (REA) and cannot state an opinion that would be helpful to the Commission as to what circumstances Congress intended the REA to serve.
- B. Staff has no expertise in land use law as applied by municipal, state, and /or federal agencies and cannot express an opinion helpful to the Commission as to whether any of those agencies classify the land at issue as rural.
- C. The cited reference does not contain the words "developing edges," and Staff assumes this data request was meant to reference Exhibit DJP-1T page 23, lines 17-19. Again, Staff has no expertise in land use law and cannot express an opinion helpful to the Commission as to whether any municipal, state, or federal agency classifies the land at issue as rural.
- D. The UTC does not administer the REA and Staff has no expertise as to its provisions. Staff cannot offer an opinion helpful to the Commission as to whether CREA's actions exceed its charter under the REA.