

Exhibit C

Discovery Instructions Included with ICNU's First Set of Data Requests

to PacifiCorp on February 18, 2009 and

ICNU's Second Set of Data Requests to PacifiCorp on

February 24, 2009 in Docket No. UE-090205

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • mail@dvclaw.com
Suite 400
333 SW Taylor
Portland, OR 97204

February 18, 2009

Via Electronic and U.S. Mail

Data Request Response Center
PacifiCorp
825 N.E. Multnomah, Ste. 800
Portland, OR 97232

Re: In the Matter of WUTC v. PacifiCorp
Docket No. UE-090205

To the Data Request Response Center:

Enclosed please find the Industrial Customers of Northwest Utilities' ("ICNU") First Set of Data Requests to PacifiCorp in the above-referenced matter. Consistent with past practice and due to the voluminous size of the filing, ICNU is sending these informal data requests prior to its formal intervention. Please respond to these informal data requests in ten business days, and provide your responses by no later than Wednesday, March 4, 2009, to this office, with a copy to Randall Falkenberg. Please contact our office as soon as possible if you need additional time to respond.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Brendan E. Levenick
Brendan E. Levenick

cc: Service List

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND)	DOCKET NO. UE-090205
TRANSPORTATION COMMISSION,)	
)	THE INDUSTRIAL CUSTOMERS
Complainant,)	OF NORTHWEST UTILITIES'
)	FIRST SET OF DATA REQUESTS
v.)	TO PACIFICORP
)	
PACIFICORP d/b/a PACIFIC POWER &)	
LIGHT COMPANY,)	
)	
Respondent.)	
_____)	

Dated: February 18, 2009

I. DEFINITIONS

1. "Documents" refers to all writings and records of every type in your possession, control, or custody, whether or not claimed to be privileged or otherwise excludable from discovery, including but not limited to: testimony and exhibits, memoranda, papers, correspondence, letters, reports (including drafts, preliminary, intermediate, and final reports), surveys, analyses, studies (including economic and market studies), summaries, comparisons, tabulations, bills, invoices, statements of services rendered, charts, books, pamphlets, photographs, maps, bulletins, corporate or other minutes, notes, diaries, log sheets, ledgers, transcripts, microfilm, microfiche, computer data (including E-mail), computer files, computer tapes, computer inputs, computer outputs and printouts, vouchers, accounting statements, budgets, workpapers, engineering diagrams (including "one-line" diagrams), mechanical and electrical recordings, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical, or otherwise, and drafts of any of the above.

"Documents" includes copies of documents, where the originals are not in your possession, custody or control.

"Documents" includes every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy.

"Documents" also includes any attachments or appendices to any document.

2. "Identification" and "identify" mean:

When used with respect to a document, stating the nature of the document (e.g., letter, memorandum, corporate minutes); the date, if any, appearing thereon; the date, if known, on which the document was prepared; the title of the document; the general subject matter of the document; the number of pages comprising the document; the identity of each person who wrote, dictated, or otherwise participated in the preparation of the document; the identity of each person who signed or initiated the document; the identity of each person to whom the document was addressed; the identity of each person who received the document or reviewed it; the location of the document; and the identity of each person having possession, custody, or control of the document.

When used with respect to a person, stating his or her full name; his or her most recently known home and business addresses and telephone numbers; his or her present title and position; and his or her present and prior connections or associations with any participant or party to this proceeding.

3. "PacifiCorp" refers to PacifiCorp, any affiliated company, or any officer, director or employee of PacifiCorp, or any affiliated company.
4. "Person" refers to, without limiting the generality of its meaning, every natural person, corporation, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or organization.
5. "Studies" or "study" includes, without limitation, reports, reviews, analyses and audits.
6. The terms "and" and "or" shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of this discovery any information or documents which might otherwise be considered to be beyond their scope.
7. The singular form of a word shall be interpreted as plural, and the plural form of a word shall be interpreted as singular, whenever appropriate in order to bring within the scope of this discovery request any information or documents which might otherwise be considered to be beyond their scope.

II. INSTRUCTIONS

1. These requests call for all information, including information contained in documents, which relate to the subject matter of the Data Request and which is known or available to you.
2. Where a Data Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part or portion. Any objection to a Data Request should clearly indicate the subdivision, part, or portion of the Data Request to which it is directed.
3. The time period encompassed by these Data Requests is from 1999 to the present unless otherwise specified.
4. Each response should be furnished on a separate page. In addition to hard copy, electronic versions of the document, including studies and analyses, must also be furnished if available.
5. If you cannot answer a Data Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why you cannot answer the Data Request in full, and state what information or knowledge you have concerning the unanswered portions.
6. If, in answering any of these Data Requests, you feel that any Data Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using in responding to the Data Request.
7. If a document requested is unavailable, identify the document, describe in detail the reasons the document is unavailable, state where the document can be obtained, and specify the number of pages it contains.
8. If you assert that any document has been destroyed, state when and why it was destroyed and identify the person who directed the destruction. If the document was destroyed pursuant to your document destruction program, identify and produce a copy of the guideline, policy, or company manual describing such document destruction program.
9. If you refuse to respond to any Data Request by reason of a claim of privilege, confidentiality, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document, and specify the number of pages it contains. Provide: (a) a brief description of the document; (b) date of document; (c) name of each author or preparer; (d) name of each person who received the document; and (e) the reason for withholding it and a statement of facts constituting the justification and basis for withholding it.

10. Identify the person from whom the information and documents supplied in response to each Data Request were obtained, the person who prepared each response, the person who reviewed each response, and the person who will bear ultimate responsibility for the truth of each response.
11. If no document is responsive to a Data Request which calls for a document, then so state.
12. These requests for documents and responses are continuing in character so as to require you to file supplemental answers as soon as possible if you obtain further or different information. Any supplemental answer should refer to the date and use the number of the original request or subpart thereof.
13. Whenever these Data Requests specifically request an answer rather than the identification of documents, the answer is required and the production of documents in lieu thereof will not substitute for an answer.
14. Please provide the responses to these Data Requests by Wednesday, March 4, 2009, to:

Irion A. Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor
Suite 400
Portland, OR 97204
(503) 241-7242
ias@dvclaw.com

Randall Falkenberg
RFI Consulting
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8343 Roswell Road
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February 24, 2009

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PacifiCorp
825 N.E. Multnomah, Ste. 800
Portland, OR 97232

Re: In the Matter of WUTC v. PacifiCorp
Docket No. UE-090205

To the Data Request Response Center:

Enclosed please find the Industrial Customers of Northwest Utilities' ("ICNU") Second Set of Data Requests to PacifiCorp in the above-referenced matter. Consistent with past practice and due to the voluminous size of the filing, ICNU is sending these informal data requests prior to its formal intervention being granted. Please respond to these informal data requests in ten business days, and provide your responses by no later than Tuesday, March 10, 2009, to this office, with a copy to Donald Schoenbeck. Please contact our office as soon as possible if you need additional time to respond.

For the definitions and instructions that apply to these data requests, please refer to ICNU's First Set of Data Requests to PacifiCorp, dated February 18, 2009.

Thank you for your attention to this matter. If you have any questions, please do not hesitate to call.

Sincerely,

/s/ Brendan E. Levenick
Brendan E. Levenick

cc: Service List

BEFORE THE

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND) DOCKET NO. UE-090205
TRANSPORTATION COMMISSION,)
) THE INDUSTRIAL CUSTOMERS
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) SECOND SET OF DATA REQUESTS
v.) TO PACIFICORP
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PACIFICORP d/b/a PACIFIC POWER &)
LIGHT COMPANY,)
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Respondent.)
_____)

Dated: February 24, 2009

Please provide the responses to these Data Requests by Tuesday, March 10, 2009, to:

Irion A. Sanger
Davison Van Cleve, P.C.
333 S.W. Taylor
Suite 400
Portland, OR 97204
(503) 241-7242
ias@dvclaw.com

Donald W. Schoenbeck
Regulatory & Cogeneration Services, Inc.
900 Washington Street, Suite 780
Vancouver, WA 98660
Telephone: 503-232-6155
Facsimile: 360-737-7628
dws@r-c-s-inc.com

III. DATA REQUESTS

- 2.1 With regard to Exhibit RBD-3, pages 3.7 and 3.7.1, please provide the actual green tag sales and revenue received by PacifiCorp since 2005. Please update this response as PacifiCorp executes additional sales throughout this proceeding.
- 2.2 With regard to Exhibit RBD-3, page 3.7, please provide all documents to support the pro forma sales price.
- 2.3 With regard to the prefiled testimony of Mr. Dalley, pages 34 and 35, please provide a copy of all workpapers used to derive and support the estimated revenue requirement associated with the proposed Chehalis deferral in Docket No. UE-082252.
- 2.4 With regard to the prefiled testimony of Mr. Dalley, pages 34 and 35, please provide a copy of all quarterly reports associated with the proposed Chehalis

deferral in Docket No. UE-082252. Please consider this an ongoing request, seeking a copy of all such reports throughout this proceeding.