

**PACIFIC POWER DATA REQUEST NO. 4 TO CREA:**

If Columbia REA has ever stated that it will be responsible for costs charged by Pacific Power, to a current or prospective customer/member of Columbia REA, for removal of Pacific Power's facilities, set forth the following:

- a. The individuals who participated in each communication;
- b. The date of each communication;
- c. The particular substance of each communication; and
- d. Whether such communication was in any way memorialized in written form and, if so, identify the document.

**RESPONSE TO PACIFIC POWER DATA REQUEST NO. 4:**

CREA objects to Pacific Power Data Request No. 4 as unduly burdensome. CREA further objects on the 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"<sup>4/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

CREA has stated that it will be responsible for costs charged by Pacific Power to a current or prospective member in association with the removal of Pacific Power's facilities. CREA's understanding of the purpose of the costs to permanently disconnect and remove facilities in the Net Removal Tariff is to make the Company whole for the costs of this service, not to punish the Company's customers for leaving. As such, the source of the funding for the costs to permanently disconnect and remove a customer should be irrelevant.

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<sup>4/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

Date: March 10, 2017  
Respondent: Scott Peters  
Witness: Les Teel