

PACIFIC POWER DATA REQUEST NO. 10 TO CREA:

Please produce all business development plans or other documents in any way referencing efforts by Columbia REA to encourage customers of Pacific Power to become customers/members of Columbia REA.

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 10:

CREA objects to Pacific Power Data Request No. 10 as unduly burdensome and vague. 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,”^{10/} and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

Please see CREA’s responses to Pacific Power Data Request Nos. 1 and 3.

^{10/} Order 04 ¶ 12 (Jan. 4, 2017).

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