

**PACIFIC POWER DATA REQUEST NO. 13 TO CREA:**

If your answer to Data Request No. 12 is “yes”, please state the date of initial compliance and identify the corresponding standard or rule.

**RESPONSE TO PACIFIC POWER DATA REQUEST NO. 13:**

CREA objects to Pacific Power Data Request No. 13 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>13/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

Not applicable.

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<sup>13/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

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