PACIFIC POWER DATA REQUEST NO. 16 TO CREA:

Does Columbia REA have access to grants, tax-free bonds, or low-interest loans from Federal or non-profit organizations, to further its business interests?

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 16:

CREA objects to Pacific Power Data Request No. 16 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,"^{16/} and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the foregoing objections, CREA responds as follows:

Yes.

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

^{16/} Order 04 ¶ 12 (Jan. 4, 2017).