

**PACIFIC POWER DATA REQUEST NO. 24 TO CREA:**

Please refer to Exhibit No. MPG-1T, p. 4, 11. 1-2. Mr. Gorman testifies that the proposed revisions to Pacific Power’s tariffs would “effectively eliminate competition between PP and Columbia REA....” Please set forth the following:

- a. The principal amounts of all loans that Columbia REA has received from any federal agency or department over the past 10 years;
- b. The terms under which CREA receives power from the Bonneville Power Administration;
- c. The circumstances intended to be served by the Rural Electrification Act;
- d. Whether the land within the boundaries of the City of Walla Walla is classified as “rural” by municipal, state and/or federal agencies;
- e. Whether the “developing edges of Walla Walla and College Park are classified as “rural” by municipal, state and/or federal agencies;
- f. Whether Mr. Gorman believes that CREA has exceeded the charter of the Rural Electrification Act by actively seeking to provide electric service within the traditional service area of Pacific Power, including but not limited to the City of Walla Walla;
- g. Does CREA own any sources of power generation;
- h. How does CREA intend to meet any additional load resulting from new service connections;
- i. Is Columbia Electric, LLC a non-profit entity;
- j. Does Columbia Electric, LLC utilize the same trenches for provision of broadband service as those trenches utilized by CREA for provision of electric services;
- k. Does CREA bundle any services with Columbia Electric, LLC.

**RESPONSE TO PACIFIC POWER DATA REQUEST NO. 24:**

- a. CREA objects to Pacific Power Data Request No. 24a 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>1/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, CREA responds as follows: none.
- b. CREA objects to Pacific Power Data Request No. 24b on the basis that the information requested is not relevant to the “primary issue in this proceeding [which] relates to the

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<sup>1/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

rates, terms, and conditions of [Pacific Power's] proposed tariff filings"<sup>2/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence.

- c. CREA objects to Pacific Power Data Request No. 24c 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>3/</sup> is not reasonably calculated to lead to the discovery of admissible evidence, and calls for a legal conclusion.
- d. CREA objects to Pacific Power Data Request No. 24d 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 said objections, CREA responds as follows: CREA is not aware of any municipal, state, or federal agencies that classify the City of Walla Walla as "rural."
- e. CREA objects to Pacific Power Data Request No. 24e 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>5/</sup> and is vague with respect to the reference to "the 'developing edges of Walla Walla and College Park'" and potentially calls for a legal conclusion. Without waiving said objections, CREA responds as follows: If the "developing edges of Walla Walla and College Park" is intended to mean either outside of the respective cities' Urban Growth Boundaries or incorporated areas, these areas are generally designated "rural" for certain planning purposes.
- f. CREA objects to Pacific Power Data Request No. 24f 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>6/</sup> is not reasonably calculated to lead to the discovery of admissible evidence, and is outside of the scope of Mr. Gorman's testimony. Without waiving said objections, CREA responds as follows: Mr. Gorman has no knowledge on which to base an opinion that is responsive to this request.
- g. CREA objects to Pacific Power Data Request No. 24g 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>7/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, CREA responds as follows: no.

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<sup>2/</sup> Order 04 ¶ 12 (Jan. 4, 2017).  
<sup>3/</sup> Order 04 ¶ 12 (Jan. 4, 2017).  
<sup>4/</sup> Order 04 ¶ 12 (Jan. 4, 2017).  
<sup>5/</sup> Order 04 ¶ 12 (Jan. 4, 2017).  
<sup>6/</sup> Order 04 ¶ 12 (Jan. 4, 2017).  
<sup>7/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

- h. CREA further objects to Pacific Power Data Request No. 24h 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>8/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, CREA responds as follows: CREA intends to use its existing resources to meet new load. Should CREA’s projected load exceed the capacity of its existing resources, CREA, in concert with other utilities, has existing agreements that provide for additional electrical resources that best enable it to meet its customers’ requirements.
- i. CREA objects to Pacific Power Data Request No. 24i 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>9/</sup> is not reasonably calculated to lead to the discovery of admissible evidence, and is vague. Without waiving said objections, CREA responds as follows: CREA assumes Pacific Power is referring to “Columbia Energy, LLC” in this and subsequent data requests, not “Columbia Electric, LLC.” CREA has no knowledge of Columbia Electric, LLC. Columbia Energy, LLC is not a non-profit entity.
- j. CREA objects to Pacific Power Data Request No. 24j 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>10/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, CREA responds as follows: Columbia Energy, LLC will occasionally use the same trenches as CREA, depending on the area and location.
- k. CREA further objects to Pacific Power Data Request No. 24k 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>11/</sup> and is not reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objections, CREA responds as follows: no.

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<sup>8/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

<sup>9/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

<sup>10/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

<sup>11/</sup> Order 04 ¶ 12 (Jan. 4, 2017).

Date: May 10, 2017

Respondent: Michael Gorman as to subsection f; counsel as to subsections b and c; Les Teel as to all other subsections

Witness: Michael Gorman as to subsection f; N/A as to subsections b and c; Les Teel as to all other subsections