

PACIFIC POWER DATA REQUEST NO. 009 TO BOISE:

Please refer to Exhibit No. BGM-1T, p. 32, ll. 10-14 and explain in detail why “Washington will cause less overhead costs to occur when a Washington customer departs.”

RESPONSE TO PACIFIC POWER DATA REQUEST NO. 009:

Boise objects on the basis that the Company seeks information obtainable from another source that is more convenient and less burdensome—namely, Pacific Power itself. Subject to and without waiving this objection, Boise answers as follows.

The interjurisdictional allocation factors are designed to allocate costs to the jurisdiction causing the costs. Thus, if the load of a jurisdiction declines, that jurisdiction is deemed to have caused less overhead costs to occur.

Date: May 10, 2017
Respondent: Bradley G. Mullins
Witness: Bradley G. Mullins