

**BEFORE THE**

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|                           |   |                  |
|---------------------------|---|------------------|
| WALLA WALLA COUNTRY CLUB, | ) |                  |
|                           | ) |                  |
| Complainant,              | ) | DOCKET UE-143932 |
|                           | ) |                  |
| v.                        | ) |                  |
|                           | ) |                  |
| PACIFIC POWER & LIGHT     | ) |                  |
| COMPANY,                  | ) |                  |
|                           | ) |                  |
| Respondent.               | ) |                  |
| _____                     | ) |                  |

**EXHIBIT NO.\_\_(DJM-3C)**

**REDACTED PACIFIC POWER RESPONSES TO CLUB DATA REQUESTS**

**June 24, 2015**

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062 Please refer to the Company's Response to DR 022 and Responses Exh. G. Is the policy included in Exh. G the same policy that was in effect when Pacific Power provided its July 2012 and January 2013 estimates to the Club? If not, please provide a copy of any different policy in effect during the time that either estimate was provided.

**RESPONSE:** No. Pacific Power did not have a written internal policy in 2012 or 2013.

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2 021 Please refer to Answer ¶ 13. Please provide explanation and support for the  
3 following statement: "Pacific Power understands that Complainant and Columbia  
4 Rural Electric Association seek to use facilities owned by Pacific Power."

5 RESPONSE: Generally, customers are required to install conduits and vaults. When  
6 Pacific Power installs the wire, transformers and meter it takes over ownership of the  
7 conduits and vaults. Thus, Pacific Power has ownership of the conduits and vaults on  
8 Complainant's property. On January 7, 2013, Bill Clemens communicated with the  
9 Complainant's manager Jeff Thomas. Mr. Thomas informed Mr. Clemens that CREA  
10 was planning on using existing conduit. See documents attached as Exhibit F.

11 022 In regard to Rule 6, Section I of the Pacific Power's Net Removal Tariff, please  
12 provide a narrative response explaining the Company's policy and/or position as to  
13 when the Company is required to remove facilities in conjunction with a permanent  
14 disconnection.

15 RESPONSE: Please see the requested policy which is attached as Exhibit G.

16 023 Please refer to Answer ¶ 22 and Complaint ¶ 22. Please provide: a) a narrative  
17 response explaining the Company's policy and/or position that supports Pacific  
18 Power's denial that "Rule 6 does not allow the Company to require facility removal  
19 when safety and operational reasons do not make removal necessary"; and b) any  
20 studies or documents containing Pacific Power's policy, as referenced in the answer  
21 to part a).

22 RESPONSE: The denial in Paragraph 22 of the Answer simply communicates  
23 Pacific Power's understanding that safety and operational reasons exist which require  
24 removal of the subject facilities. In paragraph 22 of its Complaint, the Walla Walla  
25 Country Club alleged to the contrary.

26 024 Please refer to Complaint Exh. H. Does the Company agree that, on May 31, 2013,  
Pacific Power offered to sell conduit and vaults to the Club for \$66,718, in lieu of  
removal? If not, please explain.

RESPONSE: Pacific Power avers that Exhibit H to the Complaint speaks for itself.  
Accordingly, Pacific Power agrees the offer was made and rejected.

Pages 3-4 of Exhibit No.\_\_(DJM-3C) are confidential pursuant to WAC 480-07-160 and have been redacted in their entirety.