

**Exh. JNS-10  
Docket UE-210829  
Witness: Jaclynn N. Simmons**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**PACIFICORP d/b/a PACIFIC POWER  
& LIGHT COMPANY,**

**Respondent.**

**DOCKET UE-210829**

**EXHIBIT TO TESTIMONY OF**

**JACLYNN N. SIMMONS**

**ON BEHALF OF STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

*PacifiCorp Response to UTC Staff Data Request No. 24*

**August 21, 2024**

## WUTC Data Request 24

Please provide emails between PacifiCorp staff and between PacifiCorp parent company and PacifiCorp team and all attachments that mention the following key words, from January 1, 2023, to present.

- (a) Interim targets.
- (b) Compliance.
- (c) CETA.
- (d) CEIP.
- (e) RFP.
- (f) Procurement.
- (g) WUTC IRP or CEIP.

## Response to WUTC Data Request 24

PacifiCorp objects to this data request on the grounds that it seeks information that is not relevant to the issues in this adjudicative proceeding, that it is beyond the scope of this proceeding, and that the request is not reasonably calculated to lead to the discovery of admissible evidence. WAC 480-07-400(3). PacifiCorp further objects to this data request to the extent that the request is overly broad, “unduly burdensome or expensive, taking into account the needs of the adjudicative proceeding, limitations on the parties’ resources, scope of the responding party’s interest in the proceeding, and the importance of the issues at stake in the adjudicative proceeding.” *Id.* PacifiCorp further objects to this data request to the extent it violates Commission rules requiring that “[d]iscovery through data requests or otherwise must not be used for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the costs of litigation.” *Id.*

PREPARER: Counsel

SPONSOR: Counsel