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November 30, 2009

Mr. Richard Aramburu
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SOSA & Friends
SCPUD1 Informal Discovery Response
CROSS Exhibit No. _43.02C

RE: EFSEC 2009-01: Whistling Ridge Energy Project
Responses to SOSA Informal Discovery and Document Production Requests

Dear Mr. Aramburu:

I write on behalf of the Skamania County Public Utility District No. 1 (SCPUD) in response to your informal discovery questions and documents requests. Your requests have been reviewed by the SCPUD manager, Robert Wittenberg and his answers are provided in the attached document. While there were certain document production requests for which he has no records, he has endeavored to point out where, in the public domain, you may be able to find such information in regard to informal discovery requests 1 and 2. As Mr. Wittenberg points out in response to informal discovery requests 1 and 2, the SCPUD has no knowledge of the Bonneville Power Administration's documents retention policy.

In regard to informal discovery request 3, there is neither contractual authority for nor ability of the SCPUD to draw power from any specific point on the BPA system. Instead, the SCPUD has contracts with the BPA that obligate the BPA to make deliveries to the SCPUD as the BPA deems suitable. In response to informal discovery request 5, I am providing you with copies of the SCPUD's two contracts with the BPA for transmission and delivery services that set forth the SCPUD/BPA relationship. I trust that this will shed some light on the services and products provided by the BPA and received by the SCPUD, which may assist in putting Mr. Wittenberg's answer to informal discovery request 3 into context.

Yours very truly,

s/ Kenneth B. Woodrich
Sent without signature to avoid delay

Kenneth B. Woodrich
Enclosures
Cc: Robert J. Wittenberg

1. The transmission line from the Bonneville Dam in the Rock Creek area to the tap line serving Stevenson, Carson and Underwood is owned, operated and maintained by the Bonneville Power Administration (BPA), not the Skamania County Public Utility District (SCPUD). A slide in the Rock Creek area that destroyed a BPA transmission support tower supporting the 115 kV line that feeds Skamania County would be disastrous. Although no such outage has occurred during my tenure with Skamania PUD, landslides have occurred in the area, and the potential is very concerning.

Tree-caused outages in the area have occurred, a major one occurring on January 3rd or 4th, 2004. The temperature dropped to 3 degrees in Underwood, and the BPA power supply was off for several hours, beginning around 10:45pm. Power to end-users was restored around 6:00am to 9:00am the next morning.

The SCPUD does not maintain records on interruptions of BPA transmission. If any entity does maintain documents regarding interruptions of customer transmission service along its transmission lines, including records that show BPA's determination of what caused the interruptions to transmission service, that would most likely be the BPA itself. The total number of natural-caused outages to the particular BPA 115 kv line that SCPUD relies on may be reflected in records kept by the BPA. This is only a suggestion my part, as I have no first-hand knowledge regarding BPA's policies and manner of maintaining and sorting documents about line outages across its thousands of miles of transmission lines. Summary annual information on BPA outages and causation is publicly available on-line at <http://transmission.bpa.gov/business/operations/outages/>. My best recollection is that SCPUD has experienced 3 or 4 such outages on this line of greater than 5 minutes since I began my tenure with the SCPUD.

- 2 As noted in the response to question 1, above, the BPA owns, manages and operates the transmission and delivery system from which SCPUD obtains its electricity. It is up to the BPA to deliver transmission of electricity to the SCPUD from its own sources. The SCPUD does not maintain records regarding delivery of transmission to the SCPUD of power generated from the Condit Dam.

I should point out that the question posed to the SCPUD asks for information and documentation of every time the SCPUD received power from the *Condit Dam* in the past ten years (2000 through 2010). BPA and SCPUD have a contract for *delivery*; SCPUD does not dictate the source of generation or voltage support to move power across the BPA grid.

There is no way for SCPUD to answer the question up to 2006 by virtue of the laws of nature regarding movement of electrons along pathways (transmission). Up to that time, the power that came in from the east could have been generated by *either* the Powerdale Dam or the Condit Dam. However, electrons do not carry markers that distinguish their generation source along a single transmission line – once they are placed on a line, they commingle along that path of least

resistance. The electrons that are transmitted on the grid to the SCPUD from the east do not, and cannot, sort themselves by contract along a transmission line so as to distinguish whether they came from Powerdale or Condit. The Powerdale and Condit dams (generation) simply provide (or in the case of Powerdale, formerly provided) voltage support. One cannot trace which electron came from which generator. It is not possible for the SCPUD to identify the source of generation of the electricity delivered, insofar as between Condit or Powerdale, up until 2006, when the Powerdale resource was eliminated. The BPA may possess information regarding which generation sources were delivering electricity to BPA under independent contracts with those generators during the ten-year period in question, but the SCPUD does not.

Attached hereto are the two contracts that the SCPUD has with the Bonneville Power Administration.

3. Please see the response to Question 2, above. The BPA moves power onto and around the grid as appropriate to meet its obligations to transmit and deliver power to its customers. The SCPUD does not "draw power" from the Bald Mountain substation in the sense that SCPUD can decide whether to draw power from that point or not. The BPA itself delivers power to the SCPUD in a fashion that meets its service obligations. In essence, BPA makes transmission and delivery decisions in the management of its system, and the SCPUD receives it at the points BPA chooses, or is able, to deliver.

The SCPUD only owns and maintains the distribution and delivery system within Skamania County.

4. The contracts SCPUD has with BPA obligate the BPA to make deliveries of power. SCPUD does control or manage the resources to answer this question. However, the voltage support from both Powerdale and Condit will be gone with the removal of the Condit Dam, and the voltage of any delivered power will be too low to for the SCPUD to utilize.
5. See the Full Requirements Power Supply Contract provided in response to Question 2, above.
6. The communications between the SCPUD and the Applicant Whistling Ridge Energy regarding backup power have been oral. I have reviewed SCPUD records to determine whether it has received or sent letters, email or other documents regarding this request, and found none, which is consistent with my recollection.