

# KINDLEY LAW PC

RAYMOND S. KINDLEY

ADMITTED IN OREGON AND WASHINGTON

September 25, 2014

## VIA ELECTRONIC AND U.S. MAIL

PUC Filing Center  
Public Utility Commission of Oregon  
P.O. Box 2148  
Salem, OR 97308-2148

**Re: UM1670 – Columbia Basin Electric Cooperative vs Pacific Power &  
North Hurlburt Wind LLC**

Attention Filing Center:

Enclosed for filing in docket UM-1670, are an original and two copies of Columbia Basin Electric Cooperative's List of Discovery Issues for the September 26, 2014, prehearing conference.

A copy of this filing has been served on all parties to this proceeding as indicated on the attached certificate of service.

Please contact this office with any questions.

Sincerely,

/s/ Raymond S. Kindley

Raymond S. Kindley  
Attorney for Columbia Basin Electric Cooperative, Inc.

cc: UM 1670 Service List

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5  
6 **BEFORE THE**  
7 **PUBLIC UTILITY COMMISSION OF OREGON**

8 COLUMBIA BASIN ELECTRIC ) Docket No. UM 1670  
COOPERATIVE, INC. an Oregon )  
9 cooperative corporation ) COLUMBIA BASIN ELECTRIC  
Complainant, ) COOPERATIVE, INC'S LIST OF  
10 vs. ) DISCOVERY ISSUES  
PACIFICORP, dba Pacific Power, an )  
11 Oregon business corporation, )  
12 Defendant, )  
)  
13 NORTH HURLBURT WIND, LLC, a )  
foreign limited liability company, )  
14 Defendant, )  
)  
15 SOUTH HURLBURT WIND, LLC, a )  
foreign limited liability company, )  
16 Defendant, )  
17 )  
18 Horseshoe Bend Wind, LLC, a )  
foreign limited liability company, )  
19 Defendant, )  
and )  
20 Caithness Shepherds Flat, LLC, a )  
foreign limited liability company, )  
21 Defendant. )

22 Pursuant to the Order dated September 26, 2104, in this proceeding concerning notice of  
23 a telephonic prehearing conference, Columbia Basin Electric Cooperative, Inc. (the  
24 "Cooperative") hereby files the list specific discovery that it seeks and has been unable to obtain.

25 1. The Cooperative submitted a set of data requests to Caithness Shepherds Flat,  
26 LLC on September 17, 2014. See Attachment 1. The parties conferred regarding concerns with

1 Caithness Shepherds Flat, LLC and could not resolve those concerns. Caithness Shepherds Flat,  
2 LLC provided the Cooperative with an email dated September 23, 2014, which identifies the data  
3 requests that it will object to and those which it will respond. See Attachment 2.

4 2. The Cooperative submitted a set of data requests to Caithness Shepherds Flat, LLC on  
5 September 9, 2014. See Attachment 3. Caithness Shepherds Flat, LLC provided a response to  
6 the Cooperative's data request. See Attachment 4.

7 3. Caithness Shepherds Flat, LLC response (Attachment 4) to the Cooperative's data  
8 requests in Attachment 3, states that Caithness Shepherds Flat, LLC will provide data responsive  
9 to those requests in the future. For instance, responses to requests nos. 3, 4, 5 and 11 state that  
10 Caithness Shepherds Flat, LLC will provide data concerning the responses in the future.

11 4. The Cooperative is concerned that Caithness Shepherds Flat, LLC has not provided  
12 responses within the require deadline and does not provide any estimate when it will provide  
13 such information. Some of the information, such as the Strategic Investment Program  
14 Agreement requested in no. 4 should be readily available and should have been provided by the  
15 required deadline. Given the deadline of October 6, 2014, for filing Cross Motions for Summary  
16 Judgment in this proceeding, the Cooperative is prejudiced by these delays of Caithness  
17 Shepherds Flat, LLC.

18  
19 DATED this 25<sup>TH</sup> day of September 2014.

20 **KINDLEY LAW PC**

21 By /s/ Raymond S. Kindley  
22 RAYMOND S. KINDLEY, OSB 964910  
23 Email: kindleylaw@comcast.net  
24 Tel: (503) 206-1010  
25 Attorney for Columbia Basin Electric  
26 Cooperative, Inc.

# KINDLEY LAW PC

RAYMOND S. KINDLEY

ADMITTED IN OREGON AND WASHINGTON

**VIA E-MAIL**

September 17, 2014

Mr. John Cameron  
Davis, Wright, Tremaine, LLP  
1300 S.W. Fifth Avenue, Suite 2400  
Portland, OR 97201-5610

RE: OR Docket UM 1670  
CBEC Third Set of Data Requests to Caithness Shepherds Flat, LLC

Please find enclosed an original and copy of the Columbia Basin Electric Cooperative's third set of data requests to Caithness Shepherds Flat, LLC.

If you have any questions, please contact me at (503) 206-1010.

Sincerely,



Raymond S. Kindley  
Attorney for Columbia Basin Electric Cooperative, Inc.

**OREGON PUBLIC UTILITY COMMISSION**  
**Docket UM 1670**  
**Columbia Basin Electric Cooperative's Third Set of Data Requests to**  
**Caithness Shépherds Flat, LLC**  
**Date September 17, 2014**  
**Data Request No. 3-CSF-1 to 3-CSF-15**

**Data Request No. 3-CSF-1:**

1. Please provide a scaled map that shows the project boundaries of North Hurlburt Wind, LLC's, South Hurlburt Wind, LLC's, and Horseshoe Bend Wind, LLC's generation projects, the transmission and distribution facilities that interconnect the three projects and interconnect the three projects to the Slatt Substation, and the Shared Premises that are described in Exhibit B-2 of the Shared Facilities Agreement.

**Data Request No. 3-CFS -2:**

2. Please provide a copy of the Parent LLC Agreement, dated November 18, 2009, as referenced and defined in the Administrative Management Agreement between North Hurlburt Wind, LLC and Shepherds Flat Management, LLC. Please provide any restatements, amendments, revisions or other changes to the Parent LLC Agreement.

**Data Request No. 3-CFS-3:**

3. Please provide a copy of the Parent Management Agreement, dated October 19, 2010, between Caithness Shepherds Flat, LLC and Shepherds Flat Management, LLC, as that agreement is referenced and defined in the Administrative Management Agreement between North Hurlburt Wind, LLC and Shepherds Flat Management, LLC. Please provide any restatements, amendments, revisions or other changes to the Parent Management Agreement.

**Data Request No. 3-CFS-4:**

4. Please provide a copy of the Balance of Plant Agreement between North Hurlburt Wind, LLC and Blattner Energy, dated October 29, 2009, as referenced and defined in the Administrative Management Agreement between North Hurlburt Wind, LLC and Shepherds Flat, LLC. Please provide any restatements, amendments, revisions or other changes to the Balance of Plant Agreement.

**Data Request No. 3-CFS -5:**

5. Please provide copy of the Company LLC Agreement, dated November 18, 2009, for North Hurlburt Wind, LLC, as that agreement is defined in the in the Administrative Management Agreement between North Hurlburt Wind, LLC and Shepherds Flat, LLC. Please provide any restatements, amendments, revisions or other changes to that Company LLC Agreement.

**Data Request No. 3-CFS-6:**

6. Please provide copy of the Company LLC Agreement for South Hurlburt Wind, LLC, as that agreement is defined in the in the Administrative Management Agreement. Please provide any restatements, amendments, revisions or other changes to that Company LLC Agreement.

**Data Request No. 3-CFS-7:**

7. Please provide copy of the Company LLC Agreement for Horseshoe Bend Wind, LLC, as that agreement is defined in the in the Administrative Management Agreement. Please provide any restatements, amendments, revisions or other changes to that Company LLC Agreement.

**Data Request No. 3-CFS-8:**

8. Please identify the location where title to the electric power that is purchased by Caithness Shepherds Flat, LLC for Horseshoe Bend Wind, LLC is transferred to Horseshoe Bend Wind, LLC.

**Data Request No. 3-CSF-9:**

9. Please identify the location where title to the electric power that is purchased by Caithness Shepherds Flat, LLC for South Hurlburt Wind, LLC is transferred to South Hurlburt Wind, LLC.

**Data Request No. 3-CFS-10:**

10. Please identify the location where title to the electric power that is purchased by Caithness Shepherds Flat, LLC for North Hurlburt Wind, LLC is transferred to North Hurlburt Wind, LLC.

**Data Request No. 3-CFS-11:**

11. Please provide copies of all written communications between Shepherds Flat Management, LLC and Columbia Basin Electric Cooperative relating to retail power purchases or electric power service.

**Data Request No. 3-CFS-12:**

12. In Caithness letter, dated July 31, 2012, (CAITHNESS003261, page 2, paragraph 2), Caithness claims "In 2010, Caithness separately requested station service power from the Coop and from Pacific Power." Please provide all documents, notes and information that concerns Caithness' request of power from Columbia Basin Electric Cooperative in 2010 or in any other subsequent year.

**Data Request No. 3-CFS-13:**

13. In Caithness letter, dated July 31, 2012, (CAITHNESS003261, page 2, paragraph 2), Caithness claims "Pacific Power informed us that it has the right to serve 100 percent of the total station service load." Please provide all information that Pacific Power provided Caithness regarding its right to service 100 percent of total station service load of all three of the wind projects in the Shepherds Flat wind project complex.

**Data Request No. 3-CFS-14:**

14. In Columbia Basin Electric Cooperative letter, dated August 21, 2012, (CAITHNESS003265), the Cooperative responds to the Caithness letter, dated July 31, 2012, (CAITHNESS003261), in which Caithness requests electric power service from the Cooperative. The Columbia Basin Electric Cooperative letter, dated August 21, 2012, accepts the Caithness request for service. Please provide all documents, notes and other information that relates to why Caithness did not proceed with receiving electric power service from Columbia Basin Electric Cooperative.

**Data Request No. 3-CFS-15:**

15. Please provide any documents, communications or other information that would demonstrate that the Columbia Basin Electric Cooperative refused to provide electric service to any of three Shepherds Flat wind projects, to Caithness Shepherds Flat, LLC or any other Caithness affiliate.



## CERTIFICATE OF SERVICE

I hereby certify that on the 17<sup>th</sup> day of September 2014, I served the foregoing document upon the persons named on the service list by electronic mail only as all parties have waived paper service.

W

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W=waives paper service

DATED: September 17, 2014

/s/ Raymond S. Kindley  
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West Linn, Oregon 97068  
kindleylaw@comcast.net  
Attorney for Columbia Basin Electric  
Cooperative, Inc.

**Ray Kindley**

---

**From:** Green, Derek <DerekGreen@dwt.com>  
**Sent:** Tuesday, September 23, 2014 1:20 PM  
**To:** Ray Kindley  
**Subject:** RE: UM1670 conferral

Yes, please do.

I'm waiting to hear back from my client on whether there is a compromise on Nos. 2 and 4, but if your request remains for the full agreements and all restatements, etc., I doubt we will reach an agreement. Caithness intends to provide the agreement in No. 3, and to respond to No. 11.

So to summarize, by my count the requests that we will seek the Commission's guidance on are:

1  
2 (tentatively)  
4 (tentatively)  
8-10  
12-15

As mentioned, I'm travelling most of Thursday. I can make a phone call on Friday, or tomorrow.

Thanks,  
Derek

**Derek D. Green** | Davis Wright Tremaine LLP  
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Disclaimer: This message may contain confidential communications protected by the attorney client privilege. If you received this message in error, please delete it and notify the sender.

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**From:** Ray Kindley [mailto:[kindleylaw@comcast.net](mailto:kindleylaw@comcast.net)]  
**Sent:** Tuesday, September 23, 2014 9:25 AM  
**To:** Green, Derek  
**Subject:** RE: UM1670 conferral

Derek,

Do I still need to set up a conference with the ALJ?

Ray Kindley

KINDLEY LAW, PC  
PO Box 569  
West Linn, OR 97068  
Ph: (503) 206-1010

# KINDLEY LAW PC

RAYMOND S. KINDLEY

ADMITTED IN OREGON AND WASHINGTON

**VIA E-MAIL**

September 9, 2014

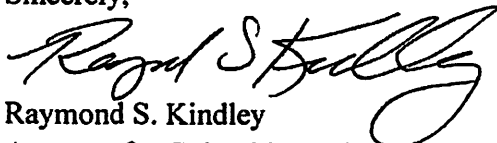
John Cameron  
Davis, Wright, Tremaine, LLP  
1300 S.W. Fifth Avenue, Suite 2400  
Portland, OR 97201-5610

RE: OR Docket UM 1670  
Second Set of Data Requests to Caithness Shepherds Flat, LLC

Please find enclosed an original and copy of the Columbia Basin Electric Cooperative's second set of data requests to Caithness Shepherds Flat, LLC.

If you have any questions, please contact me at (503) 206-1010.

Sincerely,



Raymond S. Kindley  
Attorney for Columbia Basin Electric Cooperative, Inc.

**OREGON PUBLIC UTILITY COMMISSION**  
**Docket UM 1670**  
**Columbia Basin Electric Cooperative's Third Set of Data Requests to**  
**Caithness Shepherds Flat, LLC**  
**Date September 9, 2014**  
**Data Request No. 2-CSF-1 to 2-CSF-11**

**Data Request No. 2-CSF-1:**

1. Please provide a scaled map that shows the project boundaries of North Hurlburt Wind, LLC's, South Hurlburt Wind, LLC's, and Horseshoe Bend Wind, LLC's generation projects and the transmission and distribution facilities that interconnect the three projects and interconnect the three projects to the Slatt Substation.

**Data Request No. 2-CFS -2:**

2. Please provide a scaled map that shows the project boundaries of North Hurlburt Wind, LLC's, South Hurlburt Wind, LLC's, and Horseshoe Bend Wind, LLC's generation projects and the transmission and distribution facilities that interconnect the three projects and interconnect the three projects to the Slatt Substation and please designate the ownership of those transmission and distribution facilities on the map.

**Data Request No. 2-CFS-3:**

3. Please provide all documents concerning communications between the Bonneville Power Administration and Caithness Shepherds Flat, LLC, North Hurlburt Wind, LLC, South Hurlburt Wind, LLC and/or Horseshoe Bend Wind, LLC whereby the Bonneville Power Administration prohibited the placement of power meters at the Slatt Substation.

**Data Request No. 2-CFS-4:**

4. Please provide a copy of the Strategic Investment Program Agreement between Caithness Shepherds Flat, LLC and Morrow County, Oregon.

**Data Request No. 2-CFS -5:**

5. Please provide copies of all written requests by Caithness Shepherds Flat, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Data Request No. 2-CFS-6:**

6. Please provide copies of all written requests by North Hurlburt Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Data Request No. 2-CSF-7:**

7. Please provide copies of all written requests by South Hurlburt Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Data Request No. 2-CFS-8:**

8. Please provide copies of all written requests by South Hurlburt Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Data Request No. 2-CFS-9:**

9. Please provide copies of all written requests by Horseshoe Bend Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Data Request No. 2-CFS-10:**

10. Are North Hurlburt Wind, LLC, South Hurlburt Wind, LLC and Horseshoe Bend Wind, LLC three separate, independent projects or one project, e.g. Shepherds Flat Wind Project?

**Data Request No. 2-CFS-11:**

11. Please provide all responses from Columbia Basin Electric Cooperative that Caithness Shepherds Flat, LLC, North Hurlburt Wind, LLC, South Hurlburt Wind, LLC or Horseshoe Bend Wind, LLC received regarding their requests for station service from Columbia Basin Electric Cooperative, LLC.

## CERTIFICATE OF SERVICE

I hereby certify that on the 9<sup>th</sup> day of September 2014, I served the foregoing document upon the persons named on the service list by electronic mail only as all parties have waived paper service.

W

Jerry Healy, Manager  
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W=waives paper service

DATED: September 9, 2014

/s/ Raymond S. Kindley  
Raymond S. Kindley, OSB No. 964910  
KINDLEY LAW, PC  
PO Box 569  
West Linn, Oregon 97068  
kindleylaw@comcast.net  
Attorney for Columbia Basin Electric  
Cooperative, Inc.



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UM 1670

In the Matter of

COLUMBIA BASIN ELECTRIC  
COOPERATIVE, INC.,

Complainant,

v.

PACIFICORP, dba PACIFIC POWER, CSF  
WIND, LLC, SOUTH HURLBURT WIND,  
LLC, HORSESHOE BEND WIND, LLC, AND  
CAITHNESS SHEPHERDS FLAT, LLC,

Defendants.

**DEFENDANT CAITHNESS  
SHEPHERDS FLAT, LLC'S  
RESPONSE TO COLUMBIA BASIN  
ELECTRIC COOPERATIVE'S  
SECOND SET OF DATA REQUESTS**

Defendant Caithness Shepherds Flat, LLC ("CSF") responds to Complainant Columbia Basin Electric Cooperative, Inc.'s ("Complainant") Second Set of Data Requests as follows:

**GENERAL RESPONSES AND OBJECTIONS**

1. CSF responds to Complainant's requests on its own behalf, and objects to Complainant's requests to the extent it seeks documents held or in the control of Defendant PacifiCorp dba Pacific Power ("PacifiCorp").
2. CSF objects to each request to the extent that it calls for discovery of information that is protected by the attorney-client privilege, the work product doctrine or any other privilege (collectively referred to as "privileged"). CSF's responses exclude all privileged documents or information.
3. CSF objects to each request to the extent that it calls for discovery of information not subject to discovery under the Public Utility Commission's administrative procedures, *see* OAR 860-001-0500 *et seq.*, and the Oregon Rules of Civil Procedure incorporated therein, including without limitation each request to the extent it seeks documents regarding subject matters

not relevant to this dispute, not reasonably calculated to lead to the discovery of admissible evidence, and not commensurate with the needs of the case, the resources available to the parties, and the importance of the issues to which the discovery relates.

4. CSF objects to each request to the extent that it seeks information already in Complainant's possession or control, or in the possession or control of Complainant's agents or attorneys, including all correspondence related to potential settlement and negotiations concerning resolution of this dispute. CSF further objects to each request to the extent that it seeks information in the possession or control of defendant PacifiCorp or other third parties and from whom Complainant may obtain the information at no more cost or effort than CSF.

5. CSF objects to each request to the extent that it seeks documents outside a reasonably defined time period and is, therefore, overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

6. CSF objects to each request to the extent it calls for discovery of confidential or proprietary information. Complainant will not produce any confidential or proprietary information except subject to suitable protection through a protective order.

7. CSF reserves all rights to object to the admissibility, relevancy or other use of information or documents provided pursuant to these requests.

9. This matter remains in the discovery stage, and CSF reserves the right to supplement or correct its responses to these data requests.

Each of the foregoing objections is incorporated in each and every response set forth below and the response given is made without waiving either these general objections or the specific objections stated in the individual responses. At times, in response to a specific request, CSF may restate for emphasis one or more of these general objections. However, these general objections apply to each and every individual request, and CSF's failure to restate the objection in response to an individual request must not be interpreted as a waiver of these objections as to that request.

## **RESPONSES TO DATA REQUESTS**

### **Data Request No. 2-CSF-1:**

1. Please provide a scaled map that shows the project boundaries of North Hurlburt Wind, LLC's, South Hurlburt Wind, LLC's, and Horseshoe Bend Wind, LLC's generation projects and the transmission and distribution facilities that interconnect the three projects and interconnect the three projects to the Slatt Substation.

### **Response to Request No. 2-CSF-1:**

CSF objects to this request as overly broad, unduly burdensome and not commensurate to the needs of this case. CSF further objects that this request is inconsistent with the Commission's ruling on Complainant's prior requests for similar map and diagram materials. CSF has already provided all necessary diagram information as ordered by the Commission and refers Complainant to the previously produced materials, which are herein incorporated.

Subject to its objections, CSF provides the additional attachment CAITHNESS004510-11 designated as Confidential and subject to the Protective Order in this case.

**Data Request No. 2-CFS-2 (stet):**

2. Please provide a scaled map that shows the project boundaries of North Hurlburt Wind, LLC's, South Hurlburt Wind, LLC's, and Horseshoe Bend Wind, LLC's generation projects and the transmission and distribution facilities that interconnect the three projects and interconnect the three projects to the Slatt Substation and please designate the ownership of those transmission and distribution facilities on the map.

**Response to Request No. 2-CFS-2 (stet):**

CSF objects to this request as overly broad, unduly burdensome and not commensurate to the needs of this case. CSF further objects that this request is inconsistent with the Commission's ruling on Complainant's prior requests for similar map and diagram materials. CSF has already provided all necessary diagram information as ordered by the Commission and refers Complainant to the previously produced materials, which are herein incorporated.

Subject to its objections, CSF provides the additional attachment 2-CSF-1 for use solely in this case.

**Data Request No. 2-CFS-3 (stet):**

3. Please provide all documents concerning communications between the Bonneville Power Administration and Caithness Shepherds Flat, LLC, North Hurlburt Wind, LLC, South Hurlburt Wind, LLC and/or Horseshoe Bend Wind, LLC whereby the Bonneville Power Administration prohibited the placement of power meters at the Slatt Substation.

**Response to Request No. 2-CFS-3 (stet):**

CSF objects to this request as vague and unduly burdensome. CSF responds that personnel for Bonneville Power Administration (BPA) stated at a meeting in August, 2010 that, as federal owner and operator of Slatt Substation, BPA would not allow the placement of revenue metering or any other equipment owned by Pacific Power or any other nonfederal party within Slatt Substation, but would allow instead the use of project bidirectional revenue meters (adjusted for losses) to be used for measuring both outflows and inflows of power at Slatt Substation.

CSF further responds that it is conducting an additional search for documents responsive to this request and, subject to its objections, shall produce responsive documents located after the reasonably diligent search.

**Data Request No. 2-CFS-4 (stet):**

4. Please provide a copy of the Strategic Investment Program Agreement between Caithness Shepherds Flat, LLC and Morrow County, Oregon.

**Response to Request No. 2-CFS-4:**

CSF objects to this request as irrelevant to the issues in Docket UM 1670. Subject to its objection, CSF shall produce a copy of the referenced document.

**Data Request No. 2-CFS-5 (stet):**

5. Please provide copies of all written requests by Caithness Shepherds Flat, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Response to Request No. 2-CFS-5:**

CSF objects to this request to the extent that it seeks information already in Complainant's possession or control, or in the possession or control of Complainant's agents or attorneys. Subject to its objections, CSF responds that a written request was previously produced as CAITHNESS003261, which also makes reference to verbal requests made prior to the date thereof and to the Cooperative's statements in response.

CSF further responds that it is conducting an additional search for documents responsive to this request and, subject to its objections, shall produce responsive documents located after the reasonably diligent search.

**Data Request No. 2-CFS-6 (stet):**

6. Please provide copies of all written requests by North Hurlburt Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Response to Request No. 2-CFS-6:**

CSF is not aware of any such request by North Hurlburt.



**Data Request No. 2-CSF-7 (stet):**

7. Please provide copies of all written requests by South Hurlburt Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Response to Request No. 2-CSF-7:**

See response to Data Request No. 2-CFS-5 (stet).

**Data Request No. 2-CFS-8 (stet):**

8. Please provide copies of all written requests by South Hurlburt Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Response to Request No. 2-CFS-8:**

This request is a duplicate of No. 2-CFS-7. CSF refers to its response to that data request.

**Data Request No. 2-CFS-9 (stet):**

9. Please provide copies of all written requests by Horseshoe Bend Wind, LLC regarding electric power service from Columbia Basin Electric Cooperative, Inc.

**Response to Request No. 2-CFS-9:**

See response to Data Request No. 2-CFS-5 (stet).

**Data Request No. 2-CFS-10 (stef):**

10. Are North Hurlburt Wind, LLC, South Hurlburt Wind, LLC and Horseshoe Bend Wind, LLC three separate, independent projects or one project, e.g., Shepherds Flat Wind Project?

**Response to Request No. 2-CFS-10:**

CSF objects to this request as vague and to the extent it calls for a legal conclusion. Subject to the foregoing, CSF refers to the Energy Facility Siting Council Site Certificates, which are publicly available, as well as the Large Generator Interconnection Agreements and power sale contracts previously produced.

**Data Request No. 2-CFS-11 (stet):**

11. Please provide all responses from Columbia Basin Electric Cooperative that Caithness Shepherds Flat, LLC, North Hurlburt Wind, LLC, South Hurlburt Wind, LLC or Horseshoe Bend Wind, LLC received regarding their requests for station service from Columbia Basin Electric Cooperative, LLC.

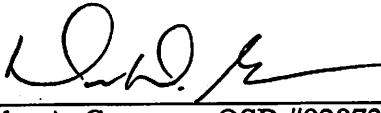
**Response to Request No. 2-CFS-11:**

CSF objects to this request to the extent that it seeks information already in Complainant's possession or control, or in the possession or control of Complainant's agents or attorneys. Subject to the foregoing, CSF refers to CAITHNESS003265, previously produced.

CSF further responds that it is conducting an additional search for documents responsive to this request and, subject to its objections, shall produce responsive documents located after the reasonably diligent search.

DATED this 23rd day of September, 2014.

DAVIS WRIGHT TREMAINE LLP

By 

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John A. Cameron, OSB #92873  
Derek D. Green, OSB #042960  
Phone: 503-241-2300  
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Of Attorneys for Defendant  
Caithness Shepherds Flat, LLC

**CERTIFICATE OF SERVICE**

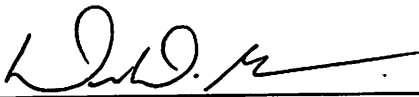
**Docket No. UM 1670**

I hereby certify that on the 23rd day of September, 2014, I served the foregoing **DEFENDANT CAITHNESS SHEPHERDS FLAT, LLC'S RESPONSE TO COLUMBIA BASIN ELECTRIC COOPERATIVE'S SECOND SET OF DATA REQUESTS** on the following party by first-class mail and electronic mail in compliance with OAR 860-001-0180:

Raymond S. Kindley  
KINDLEY LAW, PC  
P O Box 569  
West Linn, OR 97068  
Email: kindleylaw@comcast.net

DATED this 23rd day of September, 2014.

DAVIS WRIGHT TREMAINE LLP

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Of Attorneys for Defendant  
Caithness Shepherds Flat, LLC

## CERTIFICATE OF SERVICE

I hereby certify that on the 25<sup>th</sup> day of September 2014, I served the foregoing document upon the persons named on the service list by electronic mail only as all parties have waived paper service.

W

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DATED: September 25, 2014

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