

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

COLUMBIA BASIN ELECTRIC  
COOPERATIVE, INC.,

Complainant,

v.

UMATILLA ELECTRIC COOPERATIVE,  
INC.,

Defendant.

Docket No. UM 1823

**WHEATRIDGE WIND ENERGY,  
LLC'S RESPONSE TO  
COLUMBIA BASIN ELECTRIC  
COOPERATIVE'S MOTION TO  
COMPEL**

Wheatridge Wind Energy, LLC (“Wheatridge Wind”) respectfully submits this Response to Columbia Basin Electric Cooperative, Inc.’s (“CBEC”) May 5, 2017 Motion to Compel responses to its first set of data requests (“Motion”).

CBEC contends that while Wheatridge Wind provided narrative responses to its first set of data requests, Wheatridge has not produced the associated documents. Motion at 7, 10. Thus, CBEC requests that Wheatridge Wind be ordered to produce the documents. *Id.* at 10.

As of the date of this Response, Wheatridge Wind has produced all the documents identified in the responses to CBEC’s first set of data requests with the exception of the Bonneville Power Administration (“BPA”) interconnection studies that include BPA protected Critical Energy Infrastructure Information. Wheatridge Wind has sought BPA’s authorization to produce the interconnection studies, explaining to BPA that the information needs to be

///

///

///

produced as soon as practicable. Once Wheatridge Wind receives BPA's authorization, which it expects to receive early this week, the interconnection studies will be produced.

DATED this 22<sup>nd</sup> day of May 2017.

Respectfully submitted,

DAVIS WRIGHT TREMAINE, LLP

By: s/ Derek D. Green

Derek D. Green, OSB #042960

Email: [derekgreen@dwt.com](mailto:derekgreen@dwt.com)

Telephone: 503-778-5264

John A. Cameron, Jr., OSB #920371

Email: [johncameron@dwt.com](mailto:johncameron@dwt.com)

Telephone: 503-778-5206

1300 SW 5<sup>th</sup> Ave, Ste 2400

Portland OR 97201

Facsimile: 503-778-5299

Attorneys for Intervenor Wheatridge Wind  
Energy, LLC

**CERTIFICATE OF SERVICE**

I hereby certify that on the 22<sup>nd</sup> day of May, 2017, I served the foregoing

**WHEATRIDGE WIND ENERGY, LLC'S RESPONSE TO COLUMBIA BASIN**

**ELECTRIC COOPERATIVE'S MOTION TO COMPEL** by electronic mail upon the parties

listed on the Oregon Public Utility Commission's website for UM 1823.

DAVIS WRIGHT TREMAINE LLP

By: /s/ Derek D. Green

Derek D. Green, OSB #042960

Email: derekgreen@dwt.com

Telephone: (503) 778-5264

Facsimile: (503) 778-5299

Attorneys for Intervenor Wheatridge Wind  
Energy, LLC