

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION D/B/A/ AVISTA UTILITIES

Respondent.

DOCKETS UE-220053, UG-220054, and UE-210854 (Consolidated)

**AARON TAM
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT AT-6

Avista's Response to Public Counsel Data Request No. 101, With Attachment A

July 29, 2022

**AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/11/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	Elizabeth Andrews
REQUESTER:	Public Counsel	RESPONDER:	Liz Andrews
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 101	TELEPHONE:	(509) 495-8601
		EMAIL:	liz.andrews@avistacorp.com

**SUBJECT: Regulatory Asset
Andrews, Exh. EMA-1T at 62:7-11.**

REQUEST:

Please:

- a) Provide the basis and calculations in Excel with formulae intact showing how you arrived at the \$1.0 million of deferred wildfire expense for 2022 in Table 10.
- b) Explain fully the ratemaking treatment and process for wildfire program costs. How and when are costs charged to the balancing account? How and when are costs expensed and reflected in rates?
- c) Explain what type of wildfire program costs are charged to the Balancing account.
- d) Provide the amount of wildfire program costs charged and deferred to the Balancing account since the inception of the program, the balance of the account at 9/30/2021, 12/31/2021, 12/31/2022, 12/31/2023 and 12/31/2024, and the amount incurred and forecasted to be incurred between these periods. Please Provide this information in Excel.
- e) Provide the amount of deferred wildfire program costs amortized to O&M expense and the portion included in rates as of 9/30/2021, RY1, and RY2 with the supporting calculations in Excel with formulae intact.
- f) Explain what wildfire program costs are recovered from or refunded to customers through a separate tariff.
- g) Explain what wildfire program O&M expenses and capital additions-related costs are recovered both through a separate tariff and through the general rate case in RY1 and RY2. Please also, explain why.

RESPONSE:

- a) See PC-DR-101 Attachment A (Tab “2022 Expected Spend”) for the expected Wildfire Balancing Spend account deferral for 2022. Please note that the Company had included \$1 million as the Washington deferral amount in Table 10 for 2022 in error. As shown in Attachment A and described in Andrews Exh. EMA-1T, page 62, lines 2-5, the deferral in 2022 for Washington-allocated wildfire expense versus the approved wildfire baseline is expected to be approximately \$2.0 million.
- b) See Andrews testimony starting at page 57 of Exh. EMA-1T. As explained in my testimony, in the Wildfire Expense Balancing Account approved by the Commission, Avista is to record the deferral balances (expense levels higher or lower than the GRC established base) into a balancing account recorded as a separate regulatory asset in FERC Account 182.3 (Other Regulatory Assets), and credit FERC Account 407.4 (Regulatory Credit). Interest will not accrue on the unamortized balance.

Wildfire expenses are recorded monthly to O&M transmission and distribution expense accounts and coded with a MAC 207 code to track them separately. The Company has estimated a shaping

of those expenses normalized over the 12-months in calendar 2022 as can be seen in PC-DR-101 Attachment A. The Company has also shaped the baseline of the expenses approved by the Commission in UE-200900 of \$3.065 million to reflect an annual amount. For estimating purposes, the Company has provided the expected monthly amounts for 2022. However, as the actuals expenses occur, the monthly actuals will be compared to the monthly shaped baseline of \$3.065 million (annual amount) to record a deferral monthly. This shaping will ensure a full \$3.065 million is considered over any 12-month period. Any amounts on a monthly (and ultimately annual amount) above the baseline will be deferred (reducing net expenses) as described above.

Recovery of wildfire deferred balances, and the balancing account will be reviewed in future proceedings as approved by the Commission. See Andrews testimony Exh. EMA-1T page 62, line 12 – page 63, line 17.

- c) Amounts to be charged to the Wildfire Balancing account will reflect all incremental wildfire expenses that are above the Commission approved baseline. Incremental expenses currently exclude any labor related expenses, as test period labor already reflects wildfire labor expenses. The Company has removed the labor amounts from its calculation of pro forma Wildfire expenses (and proposed baseline) as noted in Attachment A, because labor expenses are considered elsewhere in the Company's case.¹ For wildfire expenses covered in the Wildfire Plan, see Company witness Mr. Howell testimony at Exh. DRH-1T.
- d) As noted in Andrews' testimony Exh., EMA-1T, at page 61, lines 14 to 62, line 6, the incremental Wildfire expense deferred for January – September 2021 totaled \$1.84 million (as of 09.30.2021), with an incremental amount deferred of October 1, 2021 through December 31, 2021 of \$618,000, for a total of \$2.5 million (balance as of 12.31.2021). The Company anticipates deferring an additional \$2.0 million during 2022, which would result in a total deferred balance of \$4.4 million as of December 31, 2022. See PC-DR-101 Attachment A (Tabs "WA Wildfire Deferral Baseline" and "Wildfire Incremental Expense"). The Company has not estimated the future deferral amounts in 2023 and 2024. If the Commission were to approve the Company's proposed Wildfire expenses baseline expected in 2023 of approximately \$8.0 million system (Washington share approximately \$5.0 million), the Company would anticipate little difference to defer. However, where actual expenses vary up or down from the expected annual wildfire expense baseline proposed in this case, or as the Wildfire plan expense is expected to reduce over time (beginning in 2025), the balancing account would reflect any deferred balances that vary from the current proposed baseline.
- e) The Company has not proposed in this case to amortize any balances deferred through the Wildfire Balancing Account. Recovery of wildfire deferred balances, and the balancing account will be reviewed in future proceedings as approved by the Commission. See Andrews testimony Exh. EMA-1T page 62, line 12 – page 63, line 17. For expenses included in the test period, and pro formed in this case, see b.) discussed above and Andrews Wildfire Expense workpapers previously provided to all parties.
- f) See Andrews testimony Exh. EMA-1T page 62, line 12 – page 63, line 17.

¹ However, it is important to note, if future wildlife expenses were to include new (incremental) labor expense between GRCs, not previously included in the Company's test period labor, the Company reserves the right to defer and seek recovery of those incremental labor expenses. Currently the Company does not anticipate the need to hire incremental employees to support the Wildfire plan, from that already existing.

- g) For expenses, please see the responses above. For capital additions included and pro formed in the case, see Andrews testimony and workpapers supporting capital adjustments 3.18, 4.04, 4.05 and 5.10. See also updated Staff-DR-052 for revised wildfire additions updated with Wildfire actual capital additions through December 31, 2021. (See Exh. EMA-1T, pages 133 (PF 3.18), 140-141 (PF 4.04 and 4.05), and 151 (PF 5.10)).

All capital and baseline level of expenses approved by the Commission would be included through base tariffs. Deferred balances of incremental wildfire expenses included in the Wildfire Balancing Account would be the only amounts subject to separate tariffs as discussed at Exh. EMA-1T page 62, line 12 – page 63, line 17.

ATTACHMENT A TO AVISTA'S RESPONSE TO PUBLIC COUNSEL

DATA REQUEST NO. 101

WF Resiliency Program MAC 207

\$ in 000's

Program	2022	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22
WF RES Transmission Png	147,000	12,250	12,250	12,250	12,250	12,250	12,250	12,250	12,250	12,250	12,250	12,250	12,250
FW Dashboard	150,000	12,500	12,500	12,500	12,500	12,500	12,500	12,500	12,500	12,500	12,500	12,500	12,500
Tx Dig Data (GeoDigital)	750,000	50,000	50,000	50,000	75,000	75,000	75,000	75,000	75,000	75,000	50,000	50,000	50,000
Tx FR Pole Wraps	550,000	45,833	45,833	45,833	64,167	64,167	64,167	73,333	73,333	73,333	-	-	-
Fuel Reduction	300,000	20,000	20,000	20,000	10,000	10,000	10,000	10,000	10,000	10,000	60,000	60,000	60,000
Tx Inspection	150,000	-	-	-	37,500	37,500	37,500	12,500	12,500	12,500	-	-	-
WF RES Distribution Png	294,000	24,500	24,500	24,500	24,500	24,500	24,500	24,500	24,500	24,500	24,500	24,500	24,500
WA Dx Risk Tree	3,232,000	215,467	215,467	215,467	215,467	215,467	215,467	323,200	323,200	323,200	323,200	323,200	323,200
ID Dx Risk Tree	1,818,000	121,200	121,200	121,200	121,200	121,200	121,200	181,800	181,800	181,800	181,800	181,800	181,800
Cust Choice RTRP	350,000	11,667	11,667	11,667	23,333	23,333	23,333	35,000	35,000	35,000	46,667	46,667	46,667
Dx Dig Data (AIDASH)	535,000	26,750	26,750	26,750	53,500	53,500	53,500	53,500	53,500	53,500	44,583	44,583	44,583
Total Expense Budget	\$8,276,000	540,167	540,167	540,167	649,417	649,417	649,417	813,583	813,583	813,583	755,500	755,500	755,500
Less Labor	\$498,696	30,980	30,980	30,980	47,603	47,603	47,603	45,336	45,336	45,336	42,314	42,314	42,314
Total Expense Less Labor	\$7,777,304	509,187	509,187	509,187	601,814	601,814	601,814	768,247	768,247	768,247	713,186	713,186	713,186
Rounding difference	-	-	-	-	-	-	-	-	-	-	-	-	-
WA Expense Base	3,065,000	307,762	272,418	261,513	228,111	219,896	226,830	254,239	258,635	226,524	237,691	264,043	307,339
WA Budgeted Expense	65.54% 5,019,475	328,537	328,537	328,537	389,244	389,244	389,244	495,732	495,732	495,732	459,645	459,645	459,645
WA Budgeted Deferral	1,954,475	20,774	56,118	67,023	161,134	169,348	162,414	241,494	237,098	269,209	221,955	195,602	152,307
ID Expense Base	1,586,468	146,743	128,157	128,736	111,420	107,084	106,390	120,123	117,264	130,084	142,407	161,196	186,865
ID Budgetd Expense	34.46% 2,757,829	180,651	180,651	180,651	212,570	212,570	212,570	272,515	272,515	272,515	253,541	253,541	253,541
ID Budgeted Deferral	1,171,361	33,908	52,494	51,915	101,150	105,486	106,180	152,392	155,251	142,431	111,134	92,345	66,676

Labor excluded from incremental wildfire expenses, labor included in test period amounts and pro formed in Labor adjustments.

	Monthly WA					
	WA Revenue Forecast {a}	Curve	WA Wildfire Expense Base {b}	Wildfire Expense	DJ477 - Booked	Wildfire Deferral {c}
Oct-21	42,996,238.94	7.75%	237,690.70	192,429.28	(45,418.47)	(45,261.42)
Nov-21	47,763,131.36	8.61%	264,042.91	169,217.79	(94,786.87)	(94,825.12)
Dec-21	55,594,972.14	10.03%	307,338.69	1,065,483.22	758,263.34	758,144.53
Jan-22	55,671,585.42	10.04%	307,762.22	357,664.61	49,715.59	49,902.39
Feb-22	49,278,167.58	8.89%	272,418.29	880,428.32	608,124.82	608,010.03
Mar-22	47,305,565.39	8.53%	261,513.40	980,922.63		719,409.23
Apr-22	41,263,283.33	7.44%	228,110.62			(228,110.62)
May-22	39,777,362.49	7.17%	219,896.19			(219,896.19)
Jun-22	41,031,668.18	7.40%	226,830.21			(226,830.21)
Jul-22	45,989,609.33	8.29%	254,238.57			(254,238.57)
Aug-22	46,784,832.78	8.44%	258,634.70			
Sep-22	40,976,188.28	7.39%	226,523.51			
Total	554,432,605.22	100%	3,065,000.00	3,646,145.85	1,275,898.41	1,066,304.06

Oct - Dec 2021
618,058

Current Month Deferral (209,594.35)

{a} 202010 WA base revenue forecast per Jenn Hossack, Resource Accounting Accounting Analyst. Each revenue type had similar spreads (less than 1% difference).

{b} Annual total per WA Order No. 08/05

{c} Currently debit 182.3 and credit 407.4. In December 2021, we followed up with Liz Andrews and the deferral process for ID & WA Wildfire has not changed and can continue booking towards the balancing account per above.

Jan-Sept 2021 Deferral \$ 1,840,167

	\$	2,458,225	2021 deferral
	\$	1,954,475	2022 Expected Deferral WA
	\$	4,412,700	Total expected deferral through December 2022

Transaction Amount					202109	202110	202111	202112	202201	202202	202203	Total				
WA	NONE	02806900	Wildfire Resiliency Defer	Voucher	885 Miscellaneous	1,840,166.86	-45,418.47	-94,786.87	758,263.34	49,715.59	608,124.82	3,116,065.27				
	OPER	02802072	WFRES Distrib Operation	Contractor	015 Construction Services							289,170	289,170			
		02802073	WFRES Distrib Maint_WA	Contractor	010 General Services				9,468.33	1,020.52				10,488.85		
					015 Construction Services	159,000.71	144,375.88	167,216.51	716,575.61	156,283.56	461,868.92	978,972.74	2,784,293.93			
					035 Workforce - Contract	0								0		
					Material	415 Material Issues				1,048.87					1,048.87	
					Overhead	530 Stores/Material Loading				73.42					73.42	
						532 Materials Tax/Fgth Loading				31.47					31.47	
					Voucher	910 Postage		149.2	118.8	30	186.8		72		556.8	
		915 Printing		7.85	11.77	10.19	3.76		17.39		50.96					
02806900	Wildfire Resiliency Defer	Voucher	885 Miscellaneous	-1,840,166.86	45,418.47	94,786.87	-758,263.34	-49,715.59	-608,124.82		-3,116,065.27					
Total					159,000.71	144,532.93	167,347.08	727,237.89	157,494.64	751,128.31	978,972.74	3,085,714.3				
ID	NONE	03805874	Wildfire Resiliency Defer	Voucher	885 Miscellaneous	388,702.22	-15,511.14	583,568.34	829,973.52	410,338.46	720,929.08	2,918,000.48				
	OPER	03802072	WFRES Distrib Operation	Contractor	015 Construction Services							192,780	192,780			
		03802073	WFRES Distrib Maint_ID	Contractor	010 General Services	0			10,987.26					10,987.26		
					015 Construction Services	399,715	73,798.25	711,377.13	789,914.48	451,770.03	588,279.27	741,078.25	3,755,932.41			
					035 Workforce - Contract	0								0		
					Voucher	910 Postage	221			130.8			170.4	215.2	737.4	
						915 Printing	1.05	14.66	0.38		17.88		12.48		46.45	
					03805874	Wildfire Resiliency Defer	Voucher	885 Miscellaneous	-388,702.22	15,511.14	-583,568.34	-829,973.52	-410,338.46	-720,929.08		-2,918,000.48
					Total					399,937.05	73,812.91	711,377.51	801,032.54	451,787.91	781,242.15	741,293.45
	AN	OPER	02806691	Wildfire Plan - Transmiss	Employee Expenses	210 Employee Auto Mileage		179.2					179.2			
					215 Employee Business Meals		16.38					16.38				
Voucher					830 Dues						199		199			
09806011		Wildfire Plan - Distributic	Employee Expenses	210 Employee Auto Mileage	201.6							231.08	432.68			
				215 Employee Business Meals		106.83		227.95				259.75	594.53			
				225 Conference Fees					199				199			
				230 Employee Lodging	100.31								100.31			
				Overhead	530 Stores/Material Loading						64.15			64.15		
				Voucher	820 Computer Equip Software			50						50		
					830 Dues						398			398		
		955 Uniforms - Employees						763.65			763.65					
29902070		WFRES Trans Maint - 11	Contractor	015 Construction Services		72,662.68							72,662.68			
				Overhead	530 Stores/Material Loading						31,322.84		31,322.84			
				Vehicle	710 Rental Expense - Vehicle	1,362.6			2,725.2	1,362.6	1,122.14	2,484.74	9,057.28			
				Voucher	880 Materials & Equipment					341,250	31,640.95		372,890.95			
29902071		WFRES Trans Oper-115k	Contractor	015 Construction Services	-45,000.74								-45,000.74			
				035 Workforce - Contract	229,983.05								229,983.05			
				Overhead	530 Stores/Material Loading			183.47					183.47			
				Voucher	880 Materials & Equipment			2,620.84					2,620.84			
33302070		WFRES Tran Maint 230k	Contractor	035 Workforce - Contract				513,136.76	-37,348.5	131,803.5		607,591.76				
39902071	WFRES Trans Operat-11	Contractor	015 Construction Services	-45,000.72								-45,000.72				
			035 Workforce - Contract	153,322.05								153,322.05				
	Employee Expenses	230 Employee Lodging			114.48						114.48					
Total					294,968.15	73,079.57	2,854.31	516,089.91	305,463.1	197,314.23	2,975.57	1,392,744.84				
Total					853,905.91	291,425.41	881,578.9	2,044,360.34	914,745.65	1,729,684.69	1,723,241.76	8,438,942.66				

P/T Ratio - ID	101,646.02	25,183.22	983.60	177,844.58	105,293.13	68,014.22	1,025.68	479,990.45
Total ID Incremental Costs	501,583.07	98,996.13	712,361.11	978,877.12	557,081.04	849,256.37	742,319.13	4,440,473.97
P/T Ratio - WA	-	47,896.35	1,870.71	338,245.33	200,169.97	129,300.01	1,949.89	719,432.26
Total WA Incremental Costs	-	192,429.28	169,217.79	1,065,483.22	357,664.61	880,428.32	980,922.63	3,646,145.85

Check - - - - -

Notes: The Wildfire Resiliency (WFRES) incremental expenses above includes all MAC 207 (Wildfire Resiliency) costs, excluding labor. Incremental labor is defined as new employees hired into a WFRES position or an existing employees hired into a WFRES position if their previous position was backfilled. Per Dave James and Cherie Hirschberger, WFRES manager, no employees met the definition of incremental as of Dec 2021.

Total Calendar Revenue		Sep-21	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23														
ID	WA	\$21,183,589	\$21,355,597	\$23,946,735	\$27,668,352	\$27,301,027	\$23,878,316	\$23,989,959	\$20,816,480	\$20,026,910	\$19,899,130	\$22,440,264	\$21,941,976	\$19,362,944	\$21,102,182	\$21,801,265	\$27,570,448	\$27,252,753	\$23,646,509	\$23,949,539	\$20,875,878	\$20,076,426	\$19,932,708	\$22,461,213	\$21,955,892	\$20,985,274	\$22,877,094	\$25,834,418														
Calendar Rev is base rate rev add on tariff rev, wind rev and decoupling																																										
Total Billed Revenue		Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24		
ID	WA	\$20,079,154	\$21,810,144	\$26,479,626	\$27,952,774	\$25,402,486	\$24,384,681	\$22,184,501	\$20,483,975	\$19,827,508	\$20,803,811	\$22,143,011	\$21,075,561	\$19,949,192	\$21,568,489	\$26,449,861	\$27,854,496	\$25,303,666	\$24,276,753	\$22,205,871	\$20,486,972	\$19,763,628	\$20,713,928	\$22,046,280	\$21,853,207	\$21,452,641	\$23,391,805	\$28,762,937	\$28,099,322	\$26,815,709	\$25,542,920	\$23,286,952	\$21,943,477	\$20,655,071	\$21,675,760	\$23,129,888	\$22,062,701	\$20,692,711	\$22,616,541	\$28,056,998		
Calendar rev less NET unbilled rev		\$40,626,802	\$42,668,288	\$51,520,077	\$55,009,571	\$51,168,769	\$47,383,405	\$41,265,183	\$40,986,238	\$41,171,313	\$42,875,700	\$46,436,427	\$41,152,559	\$40,199,039	\$42,228,047	\$51,209,861	\$55,095,113	\$51,400,158	\$47,639,007	\$42,235,879	\$40,188,281	\$39,955,440	\$41,386,700	\$46,204,614	\$45,181,580	\$41,712,172	\$44,930,039	\$54,245,756	\$58,535,149	\$54,518,335	\$50,940,784	\$45,951,028	\$42,661,999	\$42,189,024	\$43,619,163	\$48,267,955	\$46,889,296	\$42,883,265	\$48,654,422	\$54,563,584		
Total Base Rate Revenue		ID	WA	Oct-21	Nov-21	Dec-21	Jan-22	Feb-22	Mar-22	Apr-22	May-22	Jun-22	Jul-22	Aug-22	Sep-22	Oct-22	Nov-22	Dec-22	Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24
Base Rate Rev does not include Wind Rev. It is Energy Rev and Basic Charge Rev		\$21,039,494	\$24,189,574	\$28,265,935	\$27,604,000	\$23,902,395	\$24,335,260	\$21,227,865	\$20,374,143	\$19,852,346	\$22,929,240	\$21,960,031	\$19,775,278	\$21,577,551	\$24,558,711	\$29,086,254	\$28,227,352	\$24,325,451	\$24,962,628	\$21,847,287	\$20,957,511	\$20,298,566	\$21,447,547	\$22,621,986	\$18,858,780	\$21,559,702	\$24,604,799	\$20,144,324	\$27,793,540	\$25,245,824	\$25,840,468	\$22,971,052	\$21,281,277	\$18,827,509	\$20,828,198	\$21,803,909	\$21,171,114	\$20,316,476	\$21,290,786	\$25,270,806		
Base Rate Rev does not include Wind Rev. It is Energy Rev and Basic Charge Rev		\$42,596,239	\$47,763,131	\$55,094,972	\$55,671,585	\$49,278,168	\$47,305,565	\$41,263,283	\$39,772,362	\$41,031,668	\$45,989,609	\$46,784,832	\$40,976,188	\$42,448,266	\$47,131,106	\$55,394,647	\$55,809,247	\$49,099,192	\$47,700,828	\$41,911,455	\$40,359,165	\$40,889,124	\$45,824,163	\$47,058,537	\$41,115,955	\$42,621,536	\$47,220,267	\$55,458,239	\$56,583,058	\$52,523,483	\$51,199,864	\$45,963,321	\$43,026,922	\$39,976,545	\$41,905,298	\$47,312,781	\$45,836,536	\$41,279,871	\$41,544,448	\$49,219,695		

Avista Utilities
 Production/Transmission Percentage
 12 Months Ended 12/31/2021

	Washington	Idaho	Total
<u>Actual Jurisdictional Allocation (12/31/2021)</u>			
Energy Retail Sales (MWH)	5,729,047	3,500,926	9,229,973
Energy Retail Sales Percentage	62.07%	37.93%	100.00%
MW's Peak (Retail + Adjustments)	12,496	6,577	19,072
MW's Peak Percentage	65.52%	34.48%	100.00%
Final Grand Summary - Allocation of Load by Jurisdiction (Based on 50/50 Weighting)	63.79%	36.21%	100.00%
<u>Adjusted Jurisdictional Allocation</u>			
Energy Retail Sales (MWH)	5,729,047	3,500,926	9,229,973
Less: Adjustments to Idaho Load		(425,937)	(425,937)
Energy Retail Sales (MWH)	5,729,047	3,074,989	8,804,036
Energy Retail Sales Percentage	65.07%	34.93%	100.00%
MW's Peak (Retail + Adjustments)	12,496	6,577	19,072
Less: Adjustments to Washington Load (Note 1)	(942)		(942)
Less: Adjustments to Idaho Load (Note 2)		(622)	(622)
MW's Peak (Retail + Adjustments)	11,554	5,955	17,508
MW's Peak Percentage	65.99%	34.01%	100.00%
Adjusted Production Transmission Jurisdiction (Based on 50/50 Weighting)	65.53%	34.47%	100.00%

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Note 1 Pend Oreille PUD/Kaiser Adjustment

Note 2 Clearwater Paper Adjustment

CC/ Ryan Finesilver
 Cheryl Kettner
 Kaylene Schultz
 Liz Andrews
 Rubal Gill
 Justin
 Heide Evans
 Janessa Stromberger
 Blake Parker

Bradley Eastham
 Tara Knox (attachments)
 Tim Murphy
 Karen Schuh
 Keri Meister
 Jenny McCauley
 Krista Johnson
 Brian Johnson

Avista Utilities
Production/Transmission Percentage
12 Months Ended 12/31/2020

	Washington	Idaho	Total
Actual Jurisdictional Allocation (12/31/2020)			
Energy Retail Sales (MWH)	5,452,433	3,399,712	8,852,145
Energy Retail Sales Percentage	61.59%	38.41%	100.00%
MW's Peak (Retail + Adjustments)	12,453	6,284	18,737
MW's Peak Percentage	66.46%	33.54%	100.00%
Final Grand Summary - Allocation of Load by Jurisdiction (Based on 50/50 Weighting)	64.02%	35.98%	100.00%
Adjusted Jurisdictional Allocation			
Energy Retail Sales (MWH)	5,452,433	3,399,712	8,852,145
Less: Adjustments to Idaho Load		(425,937)	(425,937)
Energy Retail Sales (MWH)	5,452,433	2,973,775	8,426,208
Energy Retail Sales Percentage	64.71%	35.29%	100.00%
MW's Peak (Retail + Adjustments)	12,453	6,284	18,737
Less: Adjustments to Washington Load (Note 1)	(1,256)		(1,256)
Less: Adjustments to Idaho Load (Note 2)		(614)	(614)
MW's Peak (Retail + Adjustments)	11,197	5,670	16,867
MW's Peak Percentage	66.38%	33.62%	100.00%
Adjusted Production Transmission Jurisdiction (Based on 50/50 Weighting)	65.54%	34.46%	100.00%

Note 1 Pend Oreille PUD/Kaiser Adjustment
Note 2 Clearwater Paper Adjustment

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