

**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)

**COREY J. DAHL
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT CJD-2

Avista's Response to TEP Data Request No. 2

July 29, 2022

AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/01/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	Shawn Bonfield
REQUESTER:	The Energy Project	RESPONDER:	Shawn Bonfield
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	TEP – 002	TELEPHONE:	(509) 495-2782
		EMAIL:	shawn.bonfield@avistacorp.com

SUBJECT: Low income and CETA Labor and Advertising Expense

REQUEST:

Reference: Direct Testimony of Shawn Bonfield, Exh. SJB-1T at 10-12, 25-26, 32.

The direct testimony of Shawn J. Bonfield proposes to recover through Schedules 92 and 192 Avista's LIRAP-related program administration and support costs, including Avista's labor costs (hereinafter Proposal). Please provide any documents describing Avista's program administration and support costs that, under its Proposal, it would be permitted to recover through Schedules 92 and 192, including estimated, projected, or planned costs. This request only concerns Avista's expenses for its administration.

RESPONSE:

The Company does not have any additional documentation beyond what is included in Exh. SJB-1T regarding its Proposal. In terms of the estimated costs associated with the Proposal, as discussed by Company witness Ms. Andrews in Exh. EMA-1T, she has included adjustment 3.10 within her Electric and Natural Gas Pro Forma Studies that removes the labor associated with LIRAP included in the test year of this case, consistent with the Company's Proposal to reallocate the labor costs to the LIRAP tariff rider. As discussed in Exh. SJB-1T at 31-32, at this time the Company does not have an estimate on what it expects to spend in total on LIRAP administration; however, while the Company knows that its overall administrative costs will increase as it implements the proposed LIRAP revisions and complies with the new statutory requirements, we do not know at this time exactly how much our administrative costs will be in the future. Such costs can be reviewed and vetted through future annual tariff filings made by Avista, which will include actual and anticipated spend to appropriately set the annual LIRAP rate.

Importantly, the Company is not seeking a specific level of Avista administrative costs be allowed to be recovered through Schedules 92 and 192 in this case. Rather, as stated in Exh. SJB-1T at 33, Avista is seeking Commission approval that all administration costs to support LIRAP, both that of the Agencies and the Company, be allowed to be recovered through LIRAP. It is important to note that regardless of whether all Avista administration costs are recovered through LIRAP or not, the costs would still be incurred and paid for by customers. By allowing all of Avista's administration costs to be recovered through LIRAP, rather than through Avista's O&M expenses generally, it will provide transparency for the Commission and stakeholders regarding the full costs to support LIRAP.