

EXHIBIT LIST

Dockets UE-120436 and UG-120437

and

Dockets UE-110876 and UG-110877 (Phase Two)
(Consolidated)

HEARING DATES: November 29-30, 2012

PARTY: ICNU				
WITNESS: Michael C. Deen				
MCD-1T	Michael C. Deen			Prefiled Response Testimony of Michael C. Deen (17 pp.) (2/24/12)
MCD-2	Michael C. Deen			Qualifications of Michael C. Deen (2 pp.) (2/24/12)
MCD-3	Michael C. Deen			ICNU Study of Active Decoupling Programs (2 pp.) (2/24/12)
MCD-4CT	Michael C. Deen			***CONFIDENTIAL*** Prefiled Responsive and Cross-Answering Testimony of Michael C. Deen (22 pp.) (9/19/12)
MCD-5	Michael C. Deen			General Revenue Requirement Summary (6 pp.) (9/19/12)
MCD-6	Michael C. Deen			Avista's Response to Staff Data Request No. 223 (1 pg.) (9/19/12)
MCD-7	Michael C. Deen			WNP-3 Replacement Power Cost to Rates Comparison (1 pg.) (9/19/12)
MCD-8	Michael C. Deen			Avista's Response to Staff Data Request No. 265 (1 pg.) (9/19/12)
MCD-9	Michael C. Deen			ICNU Cost of Service Study (4 pp.) (9/19/12)
MCD-13T	Michael C. Deen			Prefiled Rebuttal Testimony of Michael C. Deen (3 pp.) (11/19/12)
CROSS-EXAMINATION EXHIBITS				
MCD-14 CX	Public Counsel			ICNU Revised Oct. 29, 2012 Response to Public Counsel Data Request No. 2

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of)	DOCKET NOS.
)	UE-110876/UG-110877/
)	UE-120436/UG-120437
AVISTA)	
)	
General Rate Increase)	INDUSTRIAL CUSTOMERS OF
)	NORTHWEST UTILITIES' REVISED
)	SECOND SET OF DATA RESPONSES
		TO PUBLIC COUNSEL

The Industrial Customers of Northwest Utilities ("ICNU") hereby responds to Public Counsel's Data Request No. 2 as follows. Subject to the objections below, ICNU will provide responses and responsive documents to Public Counsel's Second Set of Data Requests.

GENERAL OBJECTIONS

1. ICNU objects to the instructions set forth in Public Counsel's Data Requests to the extent that these instructions impose obligations on ICNU that exceed, are unauthorized by or are inconsistent with the discovery rules.
2. ICNU objects to the request to the extent that the data requested is not relevant to the issues identified in this proceeding.
3. ICNU objects to the request to the extent that production of the data requested would be unduly burdensome and that the request is overly broad.
4. ICNU objects to the request to the extent that production of the requested data would reveal information protected by the attorney-client privilege, and/or the work product doctrine, and/or any other privilege.
5. Each of the preceding general objections is incorporated by reference in each specific response below.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**AVISTA GRC 2012
Dockets UE-120436 & UG-120437
AVISTA GRC 2011
Dockets UE-110876 & UG-110877**

Public Counsel Data Request No. 2 to ICNU:

- PC-2 Regarding the recently announced employee severance incentive program, please answer/provide the following:
- a. When did ICNU first become aware of the severance program?
 - b. Provide the first correspondence wherein ICNU first became aware of the severance program. If the first correspondence was verbal, discuss how, what and when such information was relayed.
 - c. Did ICNU consider savings expected to be realized from the severance program when entering into the Settlement Stipulation in this docket? If yes, please discuss and describe how and to what extent such savings may have been considered in ICNU's decision to enter into the Settlement Stipulation. Provide any calculations or analyses undertaken. If no, please explain why such impacts were ignored in the analysis process.

Revised Response to Public Counsel Data Request No. 2:

- a. ICNU first became aware of the severance program during the course of this proceeding as a result of Public Counsel's inquiries regarding the severance program.
- b. ICNU first became aware of the severance program as a result of Public Counsel's inquiries.
- c. Severance program savings was not an issue ICNU's experts independently evaluated. ICNU has limited budgets and is unable to evaluate all possible issues in a general rate case. The Stipulation is largely a black box settlement.

Date: October 29, 2012
Respondent: Melinda J. Davison
Witness: Michael Deen