

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**AVISTA CORPORATION, DBA  
AVISTA UTILITIES,**

**Respondent.**

---

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**DOCKETS UE-170485 and  
UG-170486 (*Consolidated*)**

**EXHIBIT RRS-11C**

**AVISTA RESPONSES TO DATA REQUESTS**

**NOVEMBER 1, 2017**

**(REDACTED VERSION)**

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	07/28/2017
CASE NO:	UE-170485 & UG-170486	WITNESS:	Tara Knox
REQUESTER:	ICNU	RESPONDER:	Tara Knox
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 017C	TELEPHONE:	(509) 495-4325
		EMAIL:	tara.knox@avistacorp.com

**REQUEST:**

Referring to the Extra Large General Service (Schedule 25) rate class, please provide the following:

- a. A list of all customers receiving service under this rate schedule;
- b. The delivery voltage or voltages at which each customer is supplied;
- c. The test year energy and demand data for each customer, used in the development of the demand and energy allocation factors for the Schedule 25 class in the cost of service study;  
and

The test year billing determinants (both kWh and kW) used in the Company's proof of revenue at proposed rates.

**RESPONSE:**

The attachment provided with ICNU\_DR\_017C is **Confidential per Protective Order in UTC Dockets UE-170485 and UG-170486.**

a.-c.

The non-confidential version of this data (omitting customer names) was provided with Ms. Knox and Mr. Ehrbar work papers with the Company's initial filing.

Please see ICNU\_DR\_017C CONFIDENTIAL Attachment A.

Pages 2-3 of Exhibit RRS-11C are confidential per the protective order in UTC Dockets UE-170485 and UG-170486 and have been redacted in their entirety.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	10/19/2017
CASE NO:	UE-170485 & UG-170486	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Joe Miller
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 083	TELEPHONE:	(509) 495-4546
		EMAIL:	joe.miller@avistacorp.com

**REQUEST:**

From 2005 to the present, please provide the annual amount of Schedule 91 Demand Side Management (“DSM”) funding collected from each rate schedule, including supporting documents.

**RESPONSE:**

The Company does not have DSM revenue, by rate schedule, readily available for the years prior to the Company’s implementation of its new billing system (Project Compass). Therefore, the Company is providing DSM revenue by rate schedule for the time period after the installation of Project Compass in the attachment labeled ICNU\_DR\_083 Attachment A.

The Company does have the DSM revenue collected for Schedule 25 only as requested below:

	Schedule 25
<u>Year</u>	<u>DSM Revenue</u>
2005	\$ 570,784
2006	\$ 582,847
2007	\$ 583,346
2008	\$ 1,155,315
2009	\$ 1,855,706
2010	\$ 2,242,314
2011	\$ 2,306,451
2012	\$ 1,773,427
2013	\$ 1,495,037
2014	\$ 1,956,751
2015	\$ 1,752,710
2016	\$ 1,647,832

The attachment labeled “ICNU\_DR\_083 Attachment A” includes the supporting calculations for the Schedule 25 DSM revenue listed above.

Avista  
ICNU - 083

Rate Schedule	201701	201702	201703	201704	201705	201706	201707	201708	201709	201710	201711	201712	Total YTD
001/002	859,903	721,205	596,958	501,948	430,571	406,096	457,197	593,357	638,029				5,205,266
0011/0012	252,095	227,029	200,623	180,750	164,895	170,034	177,836	221,014	243,678				1,837,956
0021/0022	360,257	332,798	310,431	301,412	296,613	316,045	323,279	391,442	448,431				3,080,709
025	171,406	148,136	162,577	155,053	157,529	154,028	167,424	229,071	223,420				1,568,646
030/031/032	10,739	11,572	11,945	11,618	19,090	38,917	62,260	89,684	78,339				334,164
041-048	15,275	15,001	14,730	14,355	14,225	13,403	13,705	16,676	19,714				137,084
<b>Total</b>	<b>1,669,675</b>	<b>1,455,742</b>	<b>1,297,264</b>	<b>1,165,136</b>	<b>1,082,923</b>	<b>1,098,524</b>	<b>1,201,701</b>	<b>1,541,245</b>	<b>1,651,613</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>12,163,823</b>

Rate Schedule	201601	201602	201603	201604	201605	201606	201607	201608	201609	201610	201611	201612	Total
001/002	612,003	495,630	426,475	371,538	299,823	309,726	328,486	400,586	461,968	387,916	449,698	641,316	5,185,166
0011/0012	182,873	160,360	148,411	134,360	124,415	127,613	132,557	159,861	189,707	166,086	170,081	207,455	1,903,779
0021/0022	279,343	247,815	235,909	245,101	235,454	246,157	248,121	283,279	339,622	304,054	295,997	341,549	3,302,403
025	128,451	122,369	-	233,813	127,834	70,993	175,040	169,111	147,995	156,671	152,137	163,419	1,647,832
030/031/032	7,859	7,594	7,558	11,094	22,539	33,200	40,357	53,776	56,171	31,583	9,796	9,917	291,444
041-048	14,721	14,339	13,792	13,678	13,532	13,511	13,488	15,085	16,054	15,731	16,147	15,619	175,697
<b>Total</b>	<b>1,225,250</b>	<b>1,048,107</b>	<b>832,146</b>	<b>1,009,584</b>	<b>823,596</b>	<b>801,201</b>	<b>938,049</b>	<b>1,081,698</b>	<b>1,211,517</b>	<b>1,062,040</b>	<b>1,093,858</b>	<b>1,379,274</b>	<b>12,506,321</b>

Rate Schedule	201501	201502	201503	201504	201505	201506	201507	201508	201509	201510	201511	201512	Total
001/002			536,896	475,239	417,782	418,651	551,411	460,209	375,760	304,517	377,630	524,009	4,442,104
0011/0012			178,611	168,640	161,548	168,605	195,416	173,253	146,750	126,809	133,666	161,153	1,614,452
0021/0022			315,164	309,596	310,837	333,290	362,023	321,128	275,289	249,020	251,513	268,803	2,996,663
025			232,725	156,509	162,765	157,441	106,793	205,436	121,328	124,583	118,215	118,091	1,503,885
030/031/032			9,062	14,092	33,251	49,275	66,329	61,041	50,602	22,163	11,283	8,037	325,134
041-048			19,423	18,900	18,536	19,315	18,739	17,266	14,708	14,812	14,777	14,778	171,253
<b>Total</b>	<b>-</b>	<b>-</b>	<b>1,291,881</b>	<b>1,142,975</b>	<b>1,104,719</b>	<b>1,146,577</b>	<b>1,300,712</b>	<b>1,238,332</b>	<b>984,437</b>	<b>841,904</b>	<b>907,083</b>	<b>1,094,871</b>	<b>11,053,491</b>

\*\* The Company's new billing system went live in February 2015.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	10/17/2017
CASE NO.:	UE-170485 & UG-170486	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Ryan Finesilver
TYPE:	Data Request	DEPT:	DSM
REQUEST NO.:	ICNU-094	TELEPHONE:	(509) 495-4873
		EMAIL:	Ryan.finesilver@avistacorp.com

**REQUEST:**

Please confirm that the proportion of DSM funds returned to Schedule 25 customers through direct incentives is less than the overall proportion returned for the Company's Washington Electric Portfolio. If the Company cannot confirm, please explain with specific consideration and reference to the Company's responses to ICNU Data Requests 0083 and 0084 and Table 5 of the Company's 2017 Electric Demand-Side Management Annual Conservation Plan (p. 32).

**RESPONSE:**

For all except 2 years (2007 and 2009) the ratio of revenue returned to Schedule 25 customers through direct incentives was less than the ratio (.64) presented in the 2016 Revised DSM Annual Conservation Plan.

	Schedule 25	Schedule 25	
Year	DSM Revenue	DSM Direct Incentives	Ratio
2005*	\$ 570,784	\$ 304,663	0.53
2006*	\$ 852,847	\$ 139,523	0.16
2007*	\$ 583,346	\$ 915,154	1.57
2008*	\$ 1,155,315	\$ 301,082	0.26
2009	\$ 1,855,706	\$ 1,304,745	0.70
2010	\$ 2,242,314	\$ 736,950	0.33
2011	\$ 2,306,451	\$ 418,132	0.18
2012	\$ 1,773,427	\$ 832,731	0.47
2013	\$ 1,495,037	\$ 336,161	0.22
2014	\$ 1,956,751	\$ 40,244	0.02
2015	\$ 1,752,710	\$ 798,300	0.46
2016	\$ 1,647,832	\$ 604,288	0.37

\*Includes both Washington and Idaho

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	10/18/2017
CASE NO.:	UE-170485 & UG-170486	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Pat Ehrbar
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 096	TELEPHONE:	(509) 495-8620
		EMAIL:	pat.ehrbar@avistacorp.com

**REQUEST:**

In the Company’s opinion, what would be the barriers, if any, to implementing the following DSM approaches for large, energy intensive, industries, such as in Schedule 25. Please explain your answers.

- a. Allowing the customers to “opt-out” of participation in the utility-sponsored energy efficiency programs, both in terms of program benefits and program funding.
- b. Allowing the customers to “self-direct” their energy efficiency funding, by setting aside in their own reserve accounts specific levels of funding each month that can be withdrawn only for the purposes of funding economically beneficial energy efficiency measures, and otherwise not participating in the utility-sponsored energy efficiency programs, both in terms of program benefits and program funding.

**RESPONSE:**

- a. Probably the biggest barrier to allowing customers to opt-out of DSM funding is the lack of support from such an option from Avista, Commission Staff, and many other stakeholders. All customers, including large, energy intensive industries, should not have an opt-out option. Every customer benefits from the Company’s DSM programs through an avoidance of increased generation costs over time, among other benefits. These system benefits accrue to all customers, and therefore all customers should pay. If a customer could opt out, the system benefits of the Company’s DSM programs (i.e., lower generation costs due to load reduction) would still accrue to the customer even though the customer did not pay.
- b. A properly developed “self-direct” program could be a very viable option for large industrial customers. However, given the indirect benefits of the Company’s DSM programs, the amount of funding “opt-out” customers provide should be unchanged from their present level of funding.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	10/18/2017
CASE NO:	UE-170485 & UG-170486	WITNESS:	Elizabeth Andrews
REQUESTER:	ICNU	RESPONDER:	Paul Kimball
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 108	TELEPHONE:	(509) 495-4584
		EMAIL:	paul.kimball@avistacorp.com

**REQUEST:**

Please provide or grant permission for use of all non-confidential Avista data responses to ICNU in WUTC Docket UE-160228.

**RESPONSE:**

Please see ICNU\_DR\_108 Attachment A for all non-confidential Avista data responses to ICNU in Dockets UE-160228. Due to the voluminous size the DR's are being provided on a CD.



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

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/15/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Joe Miller
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 036	TELEPHONE:	(509) 495-4546
		EMAIL:	joe.miller@avistacorp.com

**REQUEST:**

Refer to ICNU Data Request 009. From 2005 to the present, please provide the annual amount of Schedule 91 Demand Side Management (“DSM”) funding collected from each other schedule (i.e., besides Schedule 25), including supporting documents.

**RESPONSE:**

See ICNU\_DR\_036 Attachment A for the requested information. The electronic file of ICNU\_DR\_036 Attachment A includes the supporting documents.

Avista  
ICNU-036  
Docket UE-160228

<u>Year</u>	<u>Schedule 001</u>	<u>Schedule 011/012</u>	<u>Schedule 021/022</u>	<u>Schedule 025</u>	<u>Schedule 031/032</u>	<u>Schedule 41-48 *</u>
2005	\$ 2,012,817	\$ 485,609	\$ 1,462,585	\$ 570,784	\$ 100,024	\$ 69,771
2006	\$ 2,118,954	\$ 523,948	\$ 1,484,224	\$ 582,847	\$ 103,706	\$ 75,144
2007	\$ 2,156,257	\$ 536,147	\$ 1,486,625	\$ 583,346	\$ 111,562	\$ 76,888
2008	\$ 4,371,727	\$ 1,081,100	\$ 3,014,395	\$ 1,155,315	\$ 224,792	\$ 153,798
2009	\$ 7,453,675	\$ 1,806,270	\$ 5,017,050	\$ 1,855,706	\$ 398,054	\$ 262,053
2010	\$ 7,428,838	\$ 1,830,230	\$ 5,076,086	\$ 2,242,314	\$ 358,075	\$ 249,356
2011	\$ 7,660,238	\$ 2,002,609	\$ 5,052,974	\$ 2,306,451	\$ 366,385	\$ 274,262
2012	\$ 5,986,584	\$ 1,846,875	\$ 3,903,798	\$ 1,773,427	\$ 286,367	\$ 216,095
2013	\$ 5,122,255	\$ 1,691,283	\$ 3,104,260	\$ 1,495,037	\$ 250,073	\$ 166,311
2014	\$ 6,431,752	\$ 2,169,349	\$ 3,952,824	\$ 1,956,751	\$ 346,245	\$ 218,568
2015	\$ 5,720,522	\$ 1,989,896	\$ 3,609,896	\$ 1,752,710	\$ 341,764	\$ 199,023

\* The Company used Street & Area Light base revenue from past GRC's that most closely aligned with the corresponding year in order to estimate the amount of DSM revenue collected for Schedules 41-48.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	10/24/2017
CASE NO:	UE-170485 & UG-170486	WITNESS:	Tara Knox
REQUESTER:	ICNU	RESPONDER:	Tara Knox
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 110	TELEPHONE:	(509) 495-4325
		EMAIL:	tara.knox@avistacorp.com

**REQUEST:**

Please review the workpaper of Avista witness Tara Knox “Demand 12CP 12.xlsm,” related to the class cost of service study, at tab “Peak Calc CP,” Excel rows 74 and 75. Please confirm that the demand units shown, and the allocation factors developed for 12 CP demand, utilize peak loads for the period of 12 months ended September 2016, rather than the test period of calendar 2016. If not, please explain why not and provide a specific reference to the exhibits or workpapers that demonstrate this.

**RESPONSE:**

The cell formulas in rows 74 and 75 in columns L, M, and N erroneously bring in 2015 Production Transmission Ratio values instead of 2016 values. This causes the October, November, and December values for the demand estimated rate classes (Schedules 1/2, 11/12, 21/22, and 31/32) to be true-up to 2015 peak loads. Therefore the results for those months are neither 2016 nor 2015 values, but an odd combination as all of the other inputs for those columns are 2016 values. This error does not affect the Schedule 25 or Street and Area Light allocation factor values<sup>1</sup>, but it does slightly impact the WA total as the estimated schedules are affected. Please also see Avista’s response to ICNU\_DR\_112.

---

<sup>1</sup> Schedule 25 hourly loads are identified from actual meter data and Street and Area Light loads are determined by total usage divided by hours of darkness multiplied by the proportion of each peak hour that occurs during the hours of darkness. The other rate schedule peak hour load estimates are calculated on the tab “WA DemEst” and these estimated values are adjusted in a true-up to the jurisdictional peak demand from the Production Transmission Ratio workpapers. The true-up adjustment is only applied to the estimated rate schedules.

Pages 12-23 of Exhibit RRS-11C are confidential per the protective order in UTC Dockets UE-170485 and UG-170486 and have been redacted in their entirety.