



ATTORNEY GENERAL OF WASHINGTON

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December 30, 2013

SENT VIA ABC LMI AND E-MAIL

Steven V. King
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, Washington 98504-7250

Re: Avista 2014 Rate Increase Compliance Filing
Docket UE-120436

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RECORDS MANAGEMENT
2014 JAN -2 AM 9:38
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Mr. King:

In the September 25, 2013 compliance filing referenced above, Avista provided a 2014 capital expenditure plan which is a very high level summary of projected 2014 total company/total operations capital expenditures. The information provided in Table 3 of the compliance filing appears to include no greater detail or support for 2014 capital expenditures than was provided on a forecast basis for 2014 in the rate case proceeding in Docket Nos. UE-120436/120437. We understand the Commission Order approving the settlement to require Avista to provide a detailed capital expenditure plan for 2014 in this compliance filing.

As “backup” support for the attrition adjustment sponsored by Dr. Lowry in the 2012 GRC, through the testimony and exhibits of Ms. Liz Andrews, Avista proposed Adjustment 4.01 that reflected 2013 projected capital additions. The underlying workpaper support for the projected 2013 capital additions consisted of numerous pages and many lines of individually delineated construction work orders. We believe this is the level of detail that was contemplated by the Commission Order. While Public Counsel understands that the 2014 rates will take effect on January 1, 2014, we believe that more detailed capital expenditure reporting information is still necessary and important. Public Counsel has contacted Avista directly to request that Avista provide the more detailed capital expenditure information in conjunction with its June 1, 2014, compliance filing in which the Company is required to provide updates on any changes to and progress in meeting the calendar year 2014 capital expenditure plan identified in the previous quarter.

Sincerely,

Simon Ffitch
Assistant Attorney General
Public Counsel Division
(206) 389-2055

Sf:ar

cc: David Meyer

