

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation of AVISTA CORPORATION d/b/a AVISTA UTILITIES,
PUGET SOUND ENERGY, and PACIFIC POWER LIGHT COMPANY
Regarding Prudency of Outage and Replacement Power Costs

DOCKET UE-190882

AVI ALLISON ON BEHALF OF PUBLIC COUNSEL UNIT

EXHIBIT AA-3

Avista Response to Public Counsel Data Request No. 134, Attachment A
(Dockets UE-190334, UG-190335, and UE-190222)

January 10, 2020

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	09/10/2019
CASE NO.:	UE-190334 & UG-190335	WITNESS:	William Johnson
REQUESTER:	Public Counsel	RESPONDER:	William Johnson
TYPE:	Data Request	DEPT:	Power Supply
REQUEST NO.:	PC - 134	TELEPHONE:	(509) 495-406
		EMAIL:	bill.johnson@avistacorp.com

REQUEST:

Re: Avista Response to Staff ERM Data Request No. 2, Attachment B, cell D8 and Attachment C, tab "Colstrip detail," cells F2:H2. This cell adds a cost of \$509,145 to a cost of \$853,835 to calculate total July Colstrip fuel costs of \$1.4 million. Refer also to Avista Response to Staff ERM Data Request No. 2, Attachment C, tab "Colstrip detail," cells F2:H2. These cells subtract a cost of \$509,145 from a cost of \$853,835 to calculate total July Colstrip fuel costs of \$344,690.

- a) Confirm that the above descriptions of Avista's calculations are correct. If not confirmed, explain why not.
- b) Confirm that the two calculations described above are inconsistent and one of them must be in error.
 - i) If not confirmed, explain why not.
 - ii) If confirmed, identify which calculation was in error.
 - iii) If confirmed, provide corrected workpapers and corrected testimony.

RESPONSE:

- (a) The above descriptions of the calculations are correct.
- (b) The adjustment for the \$509,145 accounting entry was not done correctly in Staff ERM Data Request No. 2, Attachment B. A corrected Attachment B is attached as PC-DR-134 Attachment A, which ignores the \$509,145 adjustment altogether and considers only the costs booked to the General Ledger for July and August for Colstrip.

	A	B	C	D	E	F	G	H	I	J	K
2			<i>Authorized</i>	<i>Actual</i>	<i>diff</i>		<i>Avg pwr price</i>	<i>Replace pwr (\$000's)</i>		<i>Tot Variance (\$000's)</i>	
3			<i>(a)</i>	<i>(b)</i>	<i>(c)</i>		<i>(d)</i>	<i>(e)</i>		<i>(f)</i>	
4			<i>input</i>	<i>input</i>	<i>= b - c</i>		<i>= e / c</i>	<i>input</i>		<i>= c + e</i>	
5	COLSTRIP										
6		July									
7		Gen MWh	117,846	34,927	(82,919)		\$ 39.98				
8		Fuel (\$000's)	\$ 1,850	\$ 854	\$ (996)	fav		\$ 3,315	unfav	\$ 2,320	unfav
9		\$/MWh	\$ 15.69	\$ 24.45							
10											
11		August									
12		Gen MWh	130,596	72,308	(58,288)		\$ 55.48				
13		Fuel (\$000's)	\$ 1,952	\$ 1,380	\$ (572)	fav		\$ 3,234	unfav	\$ 2,662	unfav
14		\$/MWh	\$ 14.95	\$ 19.08							
15										\$ 4,981	unfav
16											
17	COYOTE SPRINGS 2										
18		Oct									
19		Gen MWh	147,780	20,032	(127,748)		\$ 39.58				
20		Gas (\$000's)	\$ 2,196	\$ 304	\$ (1,892)	fav		\$ 5,056	unfav	\$ 3,164	unfav
21		\$/MWh	\$ 14.86	\$ 15.16							
22											
23		Dec									
24		Gen MWh	185,072	47,391	(137,681)		\$ 45.88				
25		Gas (\$000's)	\$ 3,332	\$ 906	\$ (2,427)	fav		\$ 6,316	unfav	\$ 3,889	unfav
26		\$/MWh	\$ 18.01	\$ 19.11							
27										\$ 7,053	unfav
28											