

**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)

**CROSS EXAMINATION EXHIBIT OF CLINT G KALICH
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT CGK-__X

Avista's Response to Public Counsel's Data Request No. 317 on Power Supply

September 14, 2022

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	08/31/2022
CASE NO.:	220053/54/210854	WITNESS:	Clint Kalich
REQUESTER:	Public Counsel	RESPONDER:	Annette Brandon
TYPE:	Data Request	DEPT:	Power Supply
REQUEST NO.:	PC-317	TELEPHONE:	(509) 495-4324
		EMAIL:	Annette.brandon@avistacorp.com

REQUEST:**Re: Power Supply.**

Please provide a list with supporting documentation of all estimates or forecasts relied on in Avista's filing in this Docket that do not use data more recent than four years old.

RESPONSE:

The majority of the expense and revenue assumptions in the Company's proposed level of power supply expense is based on a forward-look of resource and load requirements for the pro-forma period. As such, typically there is no estimate or forecast that uses data "more recent than four years old". However, in accordance with the agreed-upon Power Supply Modeling methodology (agreed to per the Power Supply Workshops)¹, there are instances where the Company may rely on four- or five-year averages. As noted in Kalich Testimony CGK-1T, the following are areas where averages are utilized:

- Hydro Conditions are based on a single year of median monthly values from the eighty-year water record.²
- Five-year averages are used for forced and planned maintenance outages, hydro shaping, and variable and small (e.g., PURPA) contract generation levels, and various other data that are not known with near certainty due to year-to-year variability. Various other miscellaneous expenses, such as broker fees, CAISO sales, transmission revenues, etc. also use a five-year average when five years of data is available. For plants where two maintenance cycles exceed the five-year window (i.e., Colstrip), an average of outage rates over the past two cycles is used. Finally, extraordinary events are removed from the averaging described above when adequate justification for such removal exists.³

The list of workpapers utilized in the development of the proposed level of power supply expense is included in Kalich Exhibit CGK-2. This Exhibit provides a table of contents for each component of the power supply base, the name of the workpaper, and a brief description. The description notes where the use of averages is applicable.

¹ Power Supply Workshops required as part of Order No. 07 in Docket UE-170485 et., began in mid-2018 through 2021, included participants from the Alliance of Western Energy Consumers (AWEC), the Public Counsel Unit of the Washington Attorney General's Office (PC), Washington Utilities and Transportation Commission Staff (Staff) and Avista.

² CGK-1T, p. 9, lines 3-5.

³ CGK-1T, p 11, lines 13:21