

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: November 20, 2017
DOCKET: UE-170485/UG-170486
REQUESTER: Public Counsel

WITNESS: Jennifer Snyder
RESPONDER: Jennifer Snyder
TELEPHONE: (360) 664-1311

REQUEST NO. 1:

**RE: Testimony of Jennifer E. Snyder, Fuel Conversions
(Exh. JES-1T at 12:21 – 24:14).**

Please explain why the Commission should order the discontinuance of the Fuel Conversion Program in the Company's General Rate Case, Dockets UE-170485 and UG-170486. Also, please explain why termination of the Fuel Conversion Program is not appropriately addressed in Company's Biennial Conservation Plan (BCP) filing, Docket UE-171091.

RESPONSE:

Staff identified that the LEAP pilot provides incentives that overlap considerably with the Fuel Conversion program. The duplicative incentives provided by the LEAP pilot and the Fuel Conversion Program are appropriately addressed in the Company's General Rate Case, Dockets UE-170485 and UG-170486. As Staff cannot support the continuation of the LEAP pilot while the overlapping Fuel Conversion continues, the issues must be addressed simultaneously. Staff notes that testimony for the current Avista General Rate Case was due on October 27, 2017, and Avista BCP was due November 1, 2017. As Staff explained in Exh. JES-1T at 22:8-13, Staff believed it necessary to raise this issue in its testimony in the general rate case. Since response testimony was filed in this case, Avista has filed the 2018-19 BCP and the Company has not voluntarily responded to Advisory Group concerns about the Fuel Conversion program. This issue could, and perhaps should, also be addressed in the Company's Biennial Conservation Plan, but Staff believes it is more efficient and appropriate to confront this issue involving rates in a general rate case when there is a currently ongoing general rate case. This being the case, now, Staff believes the Commission should resolve this issue in the general rate case.