

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. 6:

**RE: Testimony of Jennifer E. Snyder, Fuel Conversions
(Exhibit No. JES-1T at 19:6-8)**

“Staff recognizes the benefits of increasing access to natural gas for customers who choose to switch fuels, and Staff supports Avista’s past development of the fuel conversion program.” Please respond to the following:

- a. Please identify and explain the benefit(s) referenced in this statement above.
- b. Please identify and explain the reason(s) Staff has supported past development of the Fuel Conversion Program. If Staff has supported the Fuel Conversion Program in past BCP filings or other docketed proceeding, please provide the docket number in your response.

RESPONSE:

- a.
 - Increasing access to natural gas allows customers a choice that may lower their bills in the near term. If state or federal policies place a price on carbon (or methane), customers may pay more for natural gas in the future. Please make note of the word may in the previous statement as the economics of fuel conversion depend on the specific situation of each customer.
 - Natural gas customers have access to a wider range of appliances, such as gas stoves and hearths, that some customers find preferable. Many of these appliances work during an electric power outage, providing a sense of reliability for some customers.
 - When customers switch to natural gas from a fossil fuel-dominated electric system, the lower overall emissions of greenhouse gases, as well as other pollutants, constitute a net benefit to society. This benefit diminishes, and then disappears, as the alternative electric resource mix become less emissions intensive. As Avista, and the market where it sources electricity, builds renewable generation, improves the efficiency of combined cycle plants, and retires coal plants, there is a tipping point at which the benefit to society manifests in switching from natural gas to electricity.
- b. Objection. WAC 480-07-405(6)(a); WAC 480-07-400(3). Staff’s prior support in other cases under other circumstances is not relevant to the issue presented by Staff in this case under these circumstances wherein Staff recommended that the Fuel Conversion Program, as described in Exh. JES-1T, should be discontinued. Additionally, it appears that this data request is intended to extract additional testimony from Staff. This request is also unreasonably

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cumulative or duplicative and its response is obtainable from some other source that is more convenient, less burdensome, and less expensive. Information beyond Staff's recommendations and explanations found in Exh. JES-1T, which may relate to this data request, can be found through an examination of Avista's prior biennial conservation plan filings that are publicly available through the Commission's Records Center and, as a member of Avista's Conservation Advisory Group, Public Counsel should have knowledge of and access to drafts of prior biennial conservation plans, which may provide additional information for this data request. Without waiving said objections, Staff makes the following response.

See JES-1T at 18:13-16 and 18-20. Staff, along with Public Counsel in some instances, has implicitly supported the Fuel Conversion program in numerous dockets approving Schedule 90 funding of Fuel Conversions as well as in multiple BCP dockets, see listed dockets below. Staff has been party to the development of Avista's BCP each biennium and has made repeated recommendations to approve plans without always expressing discontent with the Fuel Conversion program. One example of Staff's explicit past support for Avista's Fuel Conversion program is found in the April 29, 2010, Open Meeting Memo, page 5:

Fuel-Switching

Staff expressed concern that the company's history with fuel-switching programs might lead to over-achievement of this resource at the expense of other conservation measures. Despite the fact that the council's power plan excludes electric-to-natural gas conversions, the company believes, and staff agrees, that resources acquired through such conversions should be contained within the I-937 target and be considered an eligible measure. Consequently, the results of the company's target-setting process appropriately incorporate electric-to-natural gas conversions. In its Revised Report, Avista agreed to limit its acquisition of electric-to-natural gas conversions, so that for the 2010-2011 biennium, 125,982 mWh out of the 128,603 mWh acquisition target will come from non-conversion resources.

The following list of dockets is not comprehensive:

UE-160756
UE-152076
UE-152309
UE-143081
UE-132045
UE-131213
UE-111882

UE-100176
UE-101769
UE-100176

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	11/15/2017
CASE NO:	UE-170485 & UG-170486	WITNESS:	Kevin Christie
REQUESTER:	Public Counsel	RESPONDER:	Amber Gifford
TYPE:	Data Request	DEPT:	DSM
REQUEST NO.:	PC – 154	TELEPHONE:	(509) 495-2896
		EMAIL:	amber.gifford@avistacorp.com

REQUEST:

Is heating with natural gas more efficient than heating with electricity? If so, please explain why. If not, please explain why not.

RESPONSE:

The direct use of natural gas is more efficient than generating electricity produced from natural gas. For example, heating with natural gas is more efficient than heating with resistance electricity that was produced using a combined cycle turbine. A combined cycle turbine uses more BTU's of natural gas to produce the same heat generated by electric resistance. Since approximately 32% of the Company's energy is generated from natural gas turbines, there is BTU efficiency in heating directly on-site with natural gas.