

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION D/B/A/ AVISTA UTILITIES

Respondent.

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DOCKETS UE-220053, UG-220054, and UE-210854 (Consolidated)

**CROSS EXAMINATION EXHIBIT OF ELIZABETH M. ANDREWS  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT EMA-\_\_X**

Avista's Response to Public Counsel's Data Request No. 340 on Capital Additions with  
Attachment A

September 14, 2022

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	09/07/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	Elizabeth Andrews
REQUESTER:	Public Counsel	RESPONDER:	Patrick Ehrbar
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 340	TELEPHONE:	(509) 495-8620
		EMAIL:	pat.ehrbar@avistacorp.com

**SUBJECT: Capital Additions**

**REQUEST: Re: Capital Additions. Refer to Rebuttal Testimony of Elizabeth M. Andrews, Exh. EMA-7T at 64:7–27.**

Please provide the chart for Washington on page 331 of the Direct Testimony of Heather L. Rosentrater Exhibit HLR-2 updated to include the information for 2021 in Excel with cells unlocked and formulae intact. Provide also the average miles of main planned to be replaced and the average miles actually replaced during the four years from 2018 to 2021.

**RESPONSE:**

Please see PC-DR-340 Attachment A.

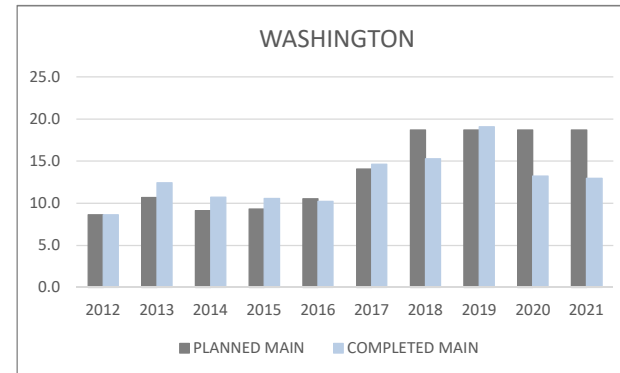
**ATTACHMENT A TO AVISTA'S RESPONSE TO PUBLIC COUNSEL'S**

**DATA REQUEST NO. 340**

MULTI-YEAR PERFORMANCE 2012-2021				
	WASHINGTON	OREGON	IDAHO	SYSTEM
	53%	27%	20%	100%
MULTI-YEAR	137.1	93.9	41.2	272.2
MULTI-YEAR	127.8	64.0	47.6	239.4
MULTI-YEAR	-9.30	-29.88	6.39	-32.79
2022 COMM	18.97	8.5	5.2	32.7
2022 COMPL	20.8	10.9	0.0	31.7
2022 VARIAN	1.8	2.4	-5.2	-1.0
MULTI-YEAR	-7.5	-27.5	1.2	-33.8

GFRP			
WASHINGTON MAJOR MAIN MILEAGE			
YEAR	PLANNED MAIN	COMPLETED MAIN	%
2012	8.7	8.6	100%
2013	10.7	12.4	117%
2014	9.1	10.7	117%
2015	9.3	10.57	114%
2016	10.54	10.23	97%
2017	14.05	14.62	104%
2018	18.7	15.30	82%
2019	18.7	19.10	102%
2020	18.7	13.23	71%
2021	18.7	12.98	69%
TOTAL	137.1	127.8	93%

MULTI-YEAR PERFORMANCE BY STATE & YEAR 2023-2027				
YEAR	WASHINGTON PLANNED MAIN	OREGON PLANNED MAIN	IDAHO PLANNED MAIN	SYSTEM PLANNED MAIN
2023	19.45	8.50	5.93	33.88
2024	18.48	8.50	6.17	33.15
2025	17.60	8.50	6.96	33.06
2026	15.25	8.50	6.71	30.46
2027	16.59	8.50	7.66	32.75
TOTAL	87.37	42.50	33.43	163.30

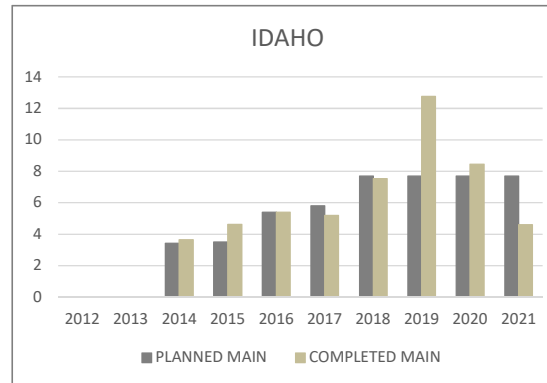
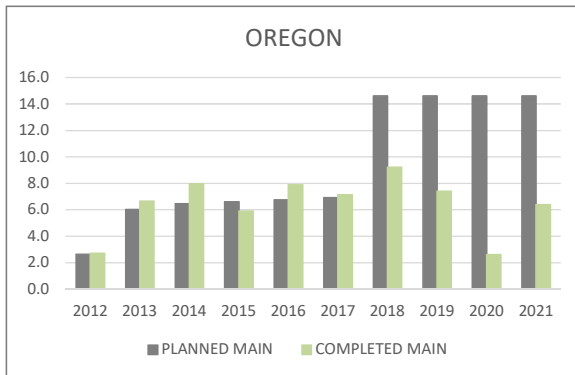


EST. COST/MILE BY STATE & YEAR 2023-2027			
YEAR	WASHINGTON	OREGON	IDAHO
2023	\$ 15,690,800	\$ 6,495,723	\$ 4,628,481
2024	\$ 15,843,671	\$ 6,729,354	\$ 4,938,609
2025	\$ 15,474,054	\$ 7,235,065	\$ 5,826,908
2026	\$ 13,773,174	\$ 7,534,321	\$ 6,222,444
2027	\$ 15,469,116	\$ 7,684,957	\$ 5,398,664
TOTAL	\$ 76,250,815	\$ 35,679,420	\$ 27,015,106

**PLANNED VS COMPLETED CONSTRUCTION MILEAGE - MULTI-YEAR PERFORMANCE BY STATE & YEAR 2012-2021**

OREGON MAJOR MAIN MILEAGE		
PLANNED MAIN	COMPLETED MAIN	%
2.7	2.7	103%
6.0	6.7	111%
6.5	8.0	123%
6.6	5.9	89%
6.8	7.9	117%
6.9	7.1	103%
14.6	9.23	63%
14.6	7.42	51%
14.6	2.62	18%
14.6	6.39	44%
<b>93.9</b>	<b>64.0</b>	<b>68%</b>

IDAHO MAJOR MAIN MILEAGE		
PLANNED MAIN	COMPLETED MAIN	%
3.42	3.65	107%
3.50	4.63	132%
5.40	5.40	100%
5.80	5.20	90%
7.7	7.5	98%
7.7	12.7	165%
7.7	8.5	110%
7.7	4.6	60%
<b>41.2</b>	<b>47.6</b>	<b>116%</b>



TOTAL MAJOR MAIN CONSTRUCTION MILEAGE IN GFRP		
PLANNED MAIN	COMPLETED MAIN	%
11.3	11.4	101%
16.7	19.1	114%
19.0	22.3	117%
19.4	21.1	109%
22.7	23.5	104%
26.8	27.0	101%
41.0	32.1	78%
41.0	39.3	96%
41.0	24.3	59%
41.0	24.0	58%
<b>238.9</b>	<b>244.0</b>	<b>102.1%</b>

SYSTEM SPEND 2012-2021		
PLANNED	ACTUAL	VARIANCE
\$ 187,876,887	\$ 179,877,352	\$ 7,999,534
		-4.26%

