

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

EXHIBIT EMA-__X

Avista's Response to Public Counsel's Data Request No. 320 on Rate Year 1 and 2 &
Elizabeth M. Andrews Work Paper, "Electric Model – WP"

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:	Liz Andrews
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 320	TELEPHONE:	(509) 495-8601
		EMAIL:	liz.andrews@avistacorp.com

SUBJECT: RE: Re: RY1 and RY2.

REQUEST:

Refer to Rebuttal Testimony of Elizabeth M. Andrews, Exh. EMA-7T at 10:18–22 and 11:1–21.

Please: a. Provide the calculations in Excel with formulas intact and all supporting data showing how the Company calculated the ROEs and RORs for each business for RY1 and RY2 in Tables 2 and 3. b. Confirm that to arrive at the ROEs and RORs in Tables 2 and 3, the Company used the revised revenue requirement proposed by Public Counsel and the rate base and the common equity balances proposed by the Company in this case for RY1 and RY2 instead of Public Counsel’s adjusted rate base and common equity. If you are not confirming, please explain in detail how the ROEs and RORs were determined

RESPONSE:

See Andrews Rebuttal workpapers provided to all parties. Labeled “Electric Model – WP” and “Nat Gas Model WP”.

To arrive at the ROEs and RORs in Tables 2 and 3, the Company used the revenue requirement as proposed by Public Counsel, using the rate base and common equity balances proposed per the Settlement for RY1 and RY2.

**ELIZABETH M. ANDREWS WORK PAPER “ELECTRIC MODEL – WP” IS
PROVIDED IN ELECTRONIC FORMAT ONLY DUE TO ITS VOLUMINOUS
SIZE WHEN PRINTED AND IN PDF FORMAT**