

**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. 321 on Rate Year 1 and 2

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 – 321	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 12:11–12.

Please identify the specific existing unrecovered costs and regulatory lag with the related dollar amount for each item and business. Specify where in the Company's direct case filing for each business, the Company identified existing unrecovered costs and regulatory lag amounts. Provide a specific reference to testimony and exhibits by line item.

**RESPONSE:**

Within Avista's direct filed case Avista identified existing unrecovered costs and regulatory lag amounts as follows:

- Avista provided its Washington electric and natural gas actual and restating results as of 09.30.2021 and returns prior to including its pro forma results for Rate Year 1 (2023) and Rate Year 2 (2024). See Exh. EMA-1T (Illustration Nos. 1 and 2 for returns) and Exhs. EMA-2 (electric) and EMA-3 (natural gas) for detail of actual and restated results as of 09.30.2021. See also the primary factors driving Avista's need for rate relief starting at page 25 of Exh. EMA-1T. Specifically, see Table Nos. 2 and 3 which provide Washington electric and natural gas gross plant additions for 2021 and 2022, representing gross plant investment regulatory lag that will exist prior to new rates going into effect for Rate Year 1. (These tables refer to the specific Avista witnesses where further information on these investments can be found. i.e. witnesses Mr. Thackston (Exh. JRT-1T), Ms. Rosentrater (Exh. HLR-1T), Mr. Kinney (Exh. SJK-1T), Mr. Kensok (Exh. JMK-1T), Mr. Howell (Exh. DRH-1T) and Mr. Magalsky (Exh. KEM-1T).) See also Table No. 4 which provides Washington electric and natural gas net rate base (after ADFIT) for electric and natural gas as of 09.30.2021, Rate Year 1 and Rate Year 2. Exh. EMA-1T discusses individual restating and pro forma adjustments within this testimony, discussing the need for these adjustments from test period levels starting at page 84 of Exh. EMA-1T.
- See Exh. EMA-1T, Table No. 5 – Revenue Requirement by Calendar year – which isolates the 2021/2022 needs of \$45.6 million for Washington electric and \$9.5 million for Washington natural gas. These amounts isolate the revenue requirement need prior to new rates going into effect for Rate Year 1 (2023), separated by the following significant categories: Direct Offsets & Other revenues, 2) Expenses/Other, 3) Capital and 4) Power Supply/Transmissions.
- See Exh. JBB-1T for specific information regarding capital investment, including Table Nos. 2-6 showing gross transfers to plant for system, Washington electric and Washington natural gas operations, separately identifying balances as of 2021 and 2022, representing plant investment in-service serving customers prior to new rates going into effect for Rate Year 1 (2023), and discussion of all Washington electric and natural gas capital adjustments.