

**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. 324 on Insurance Expense

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 – 324	TELEPHONE:	(509) 495-8601
		EMAIL:	liz.andrews@avistacorp.com

**SUBJECT: RE: Insurance expense**

**REQUEST:**

Refer to Rebuttal Testimony of Elizabeth M. Andrews Exh. EMA-7T at 24:2–11.

Please confirm that the inflation factors referenced in this section of your testimony are the same inflation factors provided in Attachment B to Avista’s Response to Public Counsel Data Request No. 121 (Exhibit SC-9). If you are not confirming, explain.

**RESPONSE:**

Confirmed, but this data was not used by the Company in this case or for expense or capital budgeting purposes. See Company witness Dr. Forsyth testimony at Exh. GDF-3T starting at page 4, line 9, for his discussion on the use of CPI and that it is not the best measure of inflation pressures for companies like Avista. These inflation factors were produced in response to Public Counsel (PC) Data Request 121, in which PC requested the following: “Provide the most recent forecasted CPI-U and PPI rates for 2022, 2023 and 2024 available to the Company from IHS, the Federal Reserve, or other widely distributed publication.” See also Avista’s response to PC-DR-335.