

**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 ROBERT E. BRANDKAMP  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT REB-\_\_X**

Avista's Response to Public Counsel's Data Request No. 345 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:	Bob Brandkamp
REQUESTER:	Public Counsel	RESPONDER:	Bob Brandkamp
TYPE:	Data Request	DEPT:	Risk Management
REQUEST NO.:	PC – 345	TELEPHONE:	(509) 495-4924
		EMAIL:	bob.brandkamp@avistacorp.com

**SUBJECT: Insurance Expense**

**REQUEST:**

**Refer to Rebuttal of Robert E. Brandkamp, Exh REB-1<sup>ST</sup> at 3:19-18.**

- a. Confirm that the Company has not filed any claims with its insurance carriers for damage caused to its property and facilities from wildfires since 2018 through current date, and does not plan to file any claims the remainder of 2022 or 2023 based on known wildfire incidents. If are not confirming, please provide a list of claims, the date filed or to be filed, the claim amount, the insurance carrier, a description of the incident and property damaged.
- b. Confirm that based on discussions with insurance carriers, Brandkamp has concluded that the increase in property insurance premiums between 2020 and 2021 had nothing to do with potential damages and claims arising from wildfires. If you are not confirming, explain the source of Brandkamp's statement that the rate increase of 17 percent from 2020 to 2021 had nothing to do with the potential for claims related to wildfires.

**RESPONSE:**

- a. Confirmed.
- b. Confirmed.