

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/15/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
REQUEST NO.:	ICNU – 041	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

REQUEST:

If the Company answered no to ICNU Data Request 040, does the Company disagree on the basis that DSM benefits go to the entire system, such that everyone benefits in the same way? If no, please explain why the Company disagrees with ICNU Data Request 040.

RESPONSE:

Although systematic benefits would be difficult to quantify whether customers benefit in the exact same way at all times, the Company believes that the actual benefits that accrue to all customers is much greater than just the direct incentives provided to customers for efficiency projects, so judging the equity of DSM by purely comparing direct incentives to the portion of funds collected through schedule 91 for specific customer classes is an incomplete analysis.

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CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
REQUEST NO.:	ICNU – 045	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

REQUEST:

Regarding “site-specific” DSM projects, please quantify, from 2005 to the present, the percentage of projects that the Company would classify as: a) “residential”; b) “non-residential”; and c) “industrial.”

RESPONSE:

- a) All of the Company’s residential program offerings are prescriptive and there are no site specific analyses performed for this segment, so the percentage would be 0%.
- b) The Company only performs site specific analyses for non-residential customers, so 100% of the site-specific analyses would be classified as non-residential.
- c) The Company classifies industrial customers under the non-residential umbrella but does not specifically track industrial projects separately.

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CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
REQUEST NO.:	ICNU – 046	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

REQUEST:

Please confirm that site-specific DSM programs have historically been one of the most cost-effective. If the Company cannot confirm, please identify which DSM programs have been more cost-effective over the last 10 years.

RESPONSE:

Historically, the site-specific DSM projects have been the most cost-effective projects.

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/28/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Patrick Ehrbar
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 095	TELEPHONE:	(509) 495-8620
		EMAIL:	pat.ehrbar@avistacorp.com

REQUEST:

Refer to Avista's responses to ICNU DRs 010, 036 and 037. Please provide a response to ICNU DR 037 that provides a quantification of benefits for each customer class schedule, similar to the isolation of Schedule 25 quantified benefits in the response to ICNU DR 010, using the same class schedule differentiation provided in response to ICNU DR 036 (i.e., 001; 011/012; 021/022; 025; 031/032; 41-48). If the Company cannot, please explain why the Company was able to isolate direct incentives paid to Schedule 25, yet cannot isolate direct incentives paid to other schedules.

RESPONSE:

Please see Avista's **CONFIDENTIAL** response to data request no. ICNU – 095C. Please note that Avista's response to ICNU – 095C is **Confidential per Protective Order in UTC Dockets 160228 & UG-160229**.

The Company was able to provide the information for Schedule 25 customers in the format provided in response to ICNU_DR_010 because the information for projects for those customers are tracked in the Company's SalesLogix customer relationship management system. However, while SalesLogix is also used to track a majority of the energy efficiency projects for non-residential customers (Schedules 11/12, 21/22, 31/32, 41-48), it is not the only system of record. For example, the Company has contracted with SBW Consulting to deliver a small business program. The data and savings from that 3rd party program is provided to Avista by SBW and tracked outside of SalesLogix.

Further, residential energy efficiency projects (including low-income program savings) are tracked in the Company's customer information system (CSS prior to 2015, and Customer Care and Billing from 2015 to present). Given the additional systems that store the requested data, we are not able to provide all of the data requested in the format requested.

Attached as ICNU_DR_095C Confidential Attachment A is the data requested (in electronic format), by rate schedule for Schedules 11/12, 21/22, 31/32, 41-48, for those projects that were tracked in SalesLogix similar to the Schedule 25 projects. The data provided in the Company's response to ICNU_DR_037 does provide, albeit in a different format than requested, the direct incentives paid to residential, low-income, and nonresidential (which includes Schedule 25). It is in the three segments listed above that Avista tracks and reports savings to its utility commissions and external Advisory Group.

Please also see the Company's response to ICNU_DR_037 and 124.

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JURISDICTION:	WASHINGTON	DATE PREPARED:	05/04/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
REQUEST NO.:	ICNU – 096	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

REQUEST:

Refer to Avista’s response to ICNU DR 041. Please provide a narrative response:

- a. Containing specific detail as to why “systematic benefits would be difficult to quantify whether customers benefit in the exact same way at all times”; and

Explaining what would complete, in the Company’s view, the referenced “incomplete analysis” pertaining to “judging the equity of DSM.”

RESPONSE:

The Company’s energy efficiency programs provide benefits to all customers as these programs help to alleviate the need for more expensive generation resources. That being said, it is not feasible to determine how the system benefits accrue to each and every individual customer as each customer would need to be analyzed individually. Please see the Company’s response to ICNU_DR_037 for the system electric avoided cost.

