JURISDICTION:	WASHINGTON	DATE PREPARED:	04/15/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	ICNU – 037	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

## **REQUEST:**

Refer to ICNU Data Request 010. From 2005 to the present, please provide a quantification of benefits received by customers of each other schedule (i.e., besides Schedule 25 customers) from the Company's DSM programs, including supporting documents.

#### **RESPONSE:**

The following table outlines the direct incentive amounts by segment (schedule 25 customers are included in the non-residential segment), as well as the overall system benefits for all customers from that year's specific electric conservation measures. Please see ICNU\_DR\_037 Attachments A and B.

Washington				
	Residential	Low	Nonresidential	System Electric Avoided
		Income		Cost
2015	\$1,950,588	\$1,182,513	\$3,344,820	\$27,856,427
2014	\$1,290,155	\$1,191,700	\$2,833,856	\$32,738,454
2013	\$861,969	\$1,065,502	\$5,889,712	\$21,250,236
2012	\$1,075,577	\$1,067,538	\$9,068,960	\$39,158,293
2011	\$4,120,122	\$1,185,713	\$5,994,025	\$40,052,031
2010	\$1,898,462	\$1,042,250	\$5,771,024	\$47,696,003
2009	\$2,696,904	\$602,817	\$4,873,740	\$53,043,356
2008*	\$5,631,549	\$729,650	\$7,453,237	\$50,820,676
2007*	\$1,677,963	\$684,990	\$5,608,812	\$30,378,349
2006*	\$491,822	\$781,963	\$5,440,662	\$19,412,648
2005*	\$212,048	\$201,482	\$2,719,420	\$25,474,995
* Washington and	Idaho			
Idaho				
	Residential	Low	Nonresidential	System Electric Avoided
		Income		Cost
2015	\$1,315,523	\$379,332	\$797,020	\$13,219,332
2014	\$575,141	\$700,170	\$967,477	\$14,124,478
2013	\$337,831	\$677,267	\$3,743,030	\$11,545,032
2012	\$550,487	\$454,688	\$3,993,211	\$17,354,787
2011	\$2,115,644	\$489,164	\$1,611,919	\$18,854,345
2010	\$999,603	\$272,845	\$2,073,950	\$21,730,493
2009	\$1,247,602	\$208,350	\$1,395,288	\$19,600,475

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/15/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	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.

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/15/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	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.

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/15/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	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 costeffective. 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.

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/15/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	ICNU – 047	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

# **REQUEST:**

From 2005 to the present, please quantify the annual share of energy savings achieved by site-specific DSM programs relative to all other DSM programs.

#### **RESPONSE:**

The table below shows the gross unverified Washington & Idaho savings, site-specific savings and site-specific percentage of the portfolio.

	Annual	Site Specific	
	Savings (kWh)	Savings (kWh)	%
2005	46,182,976	22,169,139	48.0%
2006	49,154,518	16,409,415	33.4%
2007	58,759,769	28,852,950	49.1%
2008	74,861,160	17,571,353	23.5%
2009	80,340,472	31,952,425	39.8%
2010	72,900,711	13,483,000	18.5%
2011	119,281,122	53,629,000	45.0%
2012	80,179,716	43,458,824	54.2%
2013	65,123,082	17,788,975	27.3%
2014	67,873,456	13,720,712	20.2%
2015	52,025,516	11,665,362	22.4%

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/28/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Patrick Ehrbar
TYPE:	Data Request	DEPT:	State & Federal Regulation
<b>REQUEST NO.:</b>	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 3<sup>rd</sup> 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.

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/04/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	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.

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/02/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	ICNU – 120	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

## **REQUEST:**

From 2005 to the present, please quantify the annual share of energy savings achieved by residential DSM programs relative to all other DSM programs. Please provide a response in a format comparable to the Company's response to ICNU DR 047.

#### **RESPONSE:**

The table below shows the gross unverified Washington & Idaho residential savings and those savings as a percentage of the portfolio.

	Annual Savings	Residential	%
2005	46,182,976	4,589,371	9.9%
2006	49,154,518	7,646,721	15.6%
2007	58,759,769	14,690,018	25.0%
2008	74,861,160	30,389,515	40.6%
2009	80,340,472	22,336,885	27.8%
2010	72,900,711	17,974,957	24.7%
2011	119,281,122	62,847,129	52.7%
2012	80,179,716	17,793,846	22.2%
2013	65,123,082	18,988,607	29.2%
2014	67,873,456	40,867,797	60.2%
2015	52,025,516	27,194,936	52.3%

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/02/2016
CASE NO:	UE-160228 & UG-160229	WITNESS:	Patrick Ehrbar
<b>REQUESTER:</b>	ICNU	<b>RESPONDER:</b>	Mike Dillon
TYPE:	Data Request	DEPT:	Energy Efficiency
<b>REQUEST NO.:</b>	ICNU – 121	TELEPHONE:	(509) 495-4260
		EMAIL:	mike.dillon@avistacorp.com

## **REQUEST:**

From 2005 to the present, please quantify the annual share of energy savings achieved by non-residential DSM programs relative to all other DSM programs. Please provide a response in a format comparable to the Company's response to ICNU DR 047.

#### **RESPONSE:**

The table below shows the gross unverified Washington & Idaho non-residential savings and those savings as a percentage of the portfolio.

	Annual Savings	Non-Residential	%
2005	46,182,976	41,554,363	90.0%
2006	49,154,518	39,932,501	81.2%
2007	58,759,769	42,539,553	72.4%
2008	74,861,160	42,616,253	56.9%
2009	80,340,472	54,867,510	68.3%
2010	72,900,711	52,442,578	71.9%
2011	119,281,122	49,200,814	41.2%
2012	80,179,716	61,500,125	76.7%
2013	65,123,082	45,215,857	69.4%
2014	67,873,456	22,643,592	33.4%
2015	52,025,516	24,749,881	47.6%