

**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-240006 & UG-240007 (*Consolidated*)

**CROSS-EXAMINATION EXHIBIT OF DAVID R. HOWELL  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**DRH-\_\_X**

Avista's Response to Public Counsel Data Request No. 335,  
Attachment A (Financial Risk Matrix)

**September 16, 2024**

**EXCERPT DATA FROM AVISTA'S RESPONSE TO  
PUBLIC COUNSEL DATA REQUEST NO. 335  
(EXCEL ATTACHMENT A)**

**FULL ATTACHMENT A IS PROVIDED  
ELECTRONICALLY IN ITS NATIVE FORMAT ONLY  
DUE TO THE VOLUMINOUS SIZE.**

Wildfire Team (RAW)		Pess/Opt	
Scenario	Optimistic	Pessimistic	
Tx- fire impact	\$11,955,900	\$15,840,000	1.3
Tx - tree sourced	\$36,248,500	\$61,870,200	1.7
Tx- all other	\$12,879,700	\$66,790,800	5.2
Dx - nor. weather	\$21,570,000	\$270,220,000	12.5
Dx- 40 mph wind	\$2,144,000	\$155,413,200	72.5
Dx-60 mph wind	\$4,203,857,500	\$8,458,800,000	2.0
<b>Total</b>	<b>\$4,288,655,600</b>	<b>\$9,028,934,200</b>	<b>2.1</b>
Direct AVA	\$55,846,700	\$1,694,950,000	30.4
Stock	\$41,610,000	\$638,325,000	15.3
ICE	\$4,191,198,900	\$6,695,659,200	1.6

Subject Matter Experts (RAW)		Pess/Opt	
Scenario	Optimistic	Pessimistic	
Tx- fire impact	\$12,531,900	\$84,380,000	6.7
Tx - tree sourced	\$91,301,500	\$757,050,000	8.3
Tx- all other	\$17,492,300	\$323,850,000	18.5
Dx - nor. weather	\$2,850,000	\$270,940,000	95.1
Dx- 40 mph wind	\$1,829,000	\$156,669,000	85.7
Dx-60 mph wind	\$2,094,107,300	\$19,175,100	0.0
<b>Total</b>	<b>\$2,220,112,000</b>	<b>\$1,612,064,100</b>	<b>0.7</b>
Direct AVA	\$36,413,500	\$581,923,500	16.0
Stock	\$76,950,000	\$872,775,000	11.3
ICE	\$2,106,748,500	\$157,365,600	0.1

% Difference WFRES-SME	
Optimistic	Pessimistic
5%	433%
152%	1124%
36%	385%
-87%	0%
-15%	1%
-50%	-100%
-48%	-82%
-35%	-66%
85%	37%
-50%	-98%

Wildfire Team (Revised)		Pess/Opt	
Scenario	Optimistic	Pessimistic	
Tx- fire impact	\$11,955,900	\$22,130,000	1.9
Tx - tree sourced	\$36,248,500	\$61,870,200	1.7
Tx- all other	\$12,879,700	\$66,790,800	5.2
Dx - nor. weather	\$21,570,000	\$270,220,000	12.5
Dx- 40 mph wind	\$2,144,000	\$155,413,200	72.5
Dx-60 mph wind	\$445,457,500	\$3,113,520,000	7.0
<b>Total</b>	<b>\$530,255,600</b>	<b>\$3,689,944,200</b>	<b>7.0</b>
Direct AVA	\$55,846,700	\$1,695,150,000	30.4
Stock	\$41,610,000	\$638,325,000	15.3
ICE	\$432,798,900	\$1,356,469,200	3.1

Subject Matter Experts (Revised)		Pess/Opt	
Scenario	Optimistic	Pessimistic	
Tx- fire impact	\$12,531,900	\$84,380,000	6.7
Tx - tree sourced	\$91,301,500	\$757,050,000	8.3
Tx- all other	\$17,492,300	\$323,850,000	18.5
Dx - nor. weather	\$2,850,000	\$270,940,000	95.1
Dx- 40 mph wind	\$1,829,000	\$156,669,000	85.7
Dx-60 mph wind	\$423,707,300	\$782,835,000	1.8
<b>Total</b>	<b>\$549,712,000</b>	<b>\$2,375,724,000</b>	<b>4.3</b>
Direct AVA	\$36,413,500	\$645,630,000	17.7
Stock	\$76,950,000	\$911,250,000	11.8
ICE	\$436,348,500	\$818,844,000	1.9

% Difference WFRES-SME	
Optimistic	Pessimistic
5%	281%
152%	1124%
36%	385%
-87%	0%
-15%	1%
-5%	-75%
4%	-36%
-35%	-62%
85%	43%
1%	-40%

Scenario	Min Optimistic	Max Pessimistic
Tx- fire	\$11,955,900	\$84,380,000
Tx- tree	\$36,248,500	\$757,050,000
Tx - all other	\$12,879,700	\$323,850,000
Dx- nom weather	\$2,850,000	\$270,940,000
Dx- 40 mph	\$1,829,000	\$156,669,000
Dx-60 mph	\$423,707,300	\$3,113,520,000
<b>Total</b>	<b>\$489,470,400</b>	<b>\$4,706,409,000</b>