

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: September 30, 2016
DOCKET: UE-160228/UG-160229
REQUESTER: ICNU

WITNESS: Jason L. Ball
RESPONDER: Jason L. Ball
TELEPHONE: (360) 664-1279

REQUEST NO. 16: Please refer to Exhibit No. JLB-5T at 6, footnote 9. Please confirm that Mr. Ball intended to cite to the Company's Response to ICNU Data Request 041.

RESPONSE: Confirmed.

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REQUEST NO. 17: Please refer to the graph in Exhibit No. JLB-5T at 7:

- a. To what is Mr. Ball applying the four different allocators?
- b. Please explain why these allocators are relevant.
- c. To the extent not already included in his workpapers, please provide any additional supporting documents for Mr. Ball's analysis.

RESPONSE:

- a. Each allocator is multiplied by the 2015 System Avoided Cost (\$27,856,427) provided in the Company's response to ICNU Data Request No. 037.
- b. It is difficult to estimate the level of indirect benefits that accrue to specific customer classes from avoided system capacity and market purchases. Since System Avoided Cost includes both avoided energy and avoided capacity costs, it is appropriate to use an allocator based on energy and demand. The analysis provided in Mr. Ball's testimony uses three different allocators to assign some portion of these savings to Schedule 25 customers based on their energy usage and contribution to the Company's overall system peak. Under each of these allocators, the total direct and indirect benefits of DSM programs far exceed the level of contributions provided by Schedule 25.
- c. There are none.