BEFORE THE WASHINGTON

UTILITIES & TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION, d/b/a AVISTA UTILITIES

Respondent.

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

**CROSS-EXAMINATION EXHIBIT OF CLINT G. KALICH
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

CGK-__X

Avista's Response to Public Counsel Data Request No. 304

September 16, 2024

AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/22/2024
CASE NO.:	UE-240006 & UG-240007	WITNESS:	Clint Kalich
REQUESTER:	Public Counsel	RESPONDER:	Clint Kalich
TYPE:	Data Request	DEPT:	Energy Supply
REQUEST NO.:	PC – 304	TELEPHONE:	(509) 495-4532
		EMAIL:	clint.kalich@avistacorp.com

SUBJECT: Power Supply/ Energy Recovery Mechanism (ERM)

REQUEST:

Re: Direct Testimony of Clint G. Kalich, Exh. CGK-1T at 30:18.

a. Other than the beliefs of Mr. Kalich, please provide evidence including any and all available documentation along with any data and calculations in Excel format that "inefficiencies like this lead to higher and more volatile costs."
b. Please define in mathematical terms what is meant by "volatile."
c. Using the definition given in the answer to subpart b., please provide for each of the years 2010 through 2023, the volatility in each year in Excel format along with supporting data and calculations.

RESPONSE:

a. This statement is based on the professional experience and judgement of Mr. Kalich, not other documents. However, please see the Company's response to PC-DR-305 which demonstrates historical and increasing Mid-C costs and volatility from 2010 to 2024.
b. The mathematical term is the same as the first example by Meriam Webster: "characterized by or subject to rapid or unexpected change."
c. The referenced statement was made as a generality. The supporting workpapers for Witness Kinney's Table 11 demonstrates volatility as it pertains to this case. Reference the Company's response to PC-DR-309 for the files supporting Table 11.