

**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 SCOTT J. KINNEY  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**SJK-\_\_X**

Avista's Response to Public Counsel Data Request No. 308

**September 16, 2024**

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/24/2024
CASE NO.:	UE-240006 & UG-240007	WITNESS:	Scott Kinney
REQUESTER:	Public Counsel	RESPONDER:	Clint Kalich
TYPE:	Data Request	DEPT:	Energy Supply
REQUEST NO.:	PC – 308	TELEPHONE:	(509) 495-4532
		EMAIL:	clint.kalich@avistacorp.com

**SUBJECT: Power Supply/ Energy Recovery Mechanism (ERM)**

**REQUEST:**

**Re: Direct Testimony of Scott J. Kinney, Exh. SJK-1T at 65:10–20.**

- a. What percentage of Avista’s generation output was dispatched by the EIM in the years 2023 (actual), and 2024 to 2026 (forecast)? Please provide documentation for your answer including data and calculations in Excel format.
- b. What percentage of Avista’s generation output was dispatched by the EDAM in the years 2023 (actual), and 2024 to 2026 (forecast)? Please provide documentation for your answer including data and calculations in Excel format.
- c. What percentage of Avista’s generation output was dispatched by Markets+ in the years 2023 (actual), and 2024 to 2026 (forecast)? Please provide documentation for your answer including data and calculations in Excel format.

**RESPONSE:**

Please see Avista’s **CONFIDENTIAL** response to data request PC-DR-308C. Please note that Avista’s response to PC-DR-308C is **Confidential per Protective Order in UTC Dockets UE-240006 and UG-240007**.

- a. Avista does not have a forecast of EIM exports. In 2023 and 2024 through April, Avista dispatched 5.2% of its generation for export. See the confidential file “PC-DR-308C Confidential Attachment A - AvistaEIMExports.xlsx” for the data and calculations used in this response. The EIM transactions shown in the spreadsheet are sourced from our Energy Trade and Risk Management software package Nucleus where all EIM transactions are recorded, and specifically from our CCATAGMW table used to organize our transactions in support of Washington’s Climate Commitment Act reporting to the Washington State Department of Ecology. Generation output used in the calculations are those resources over the period that were bid into EIM.
- b. 0 MWh, as Avista is not a participant in EDAM.
- c. 0 MWh, as Avista is not a participant in Markets+.