

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	11/17/2017
CASE NO.:	UE-170485 & UG-170486	WITNESS:	Patrick Ehrbar
REQUESTER:	ICNU	RESPONDER:	Pat Ehrbar
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	ICNU – 129	TELEPHONE:	(509) 495-8620
		EMAIL:	pat.ehrbar@avistacorp.com

REQUEST:

Refer to Ehrbar, Exh. PDE-1T at 6:16-19, which states that “Avista believes that the results from a variety of cost studies will continue to show that ... Schedules 1/2 ... are too far away from the overall rate of return (unity), and have been for some time.”:

- a. Please confirm that the phrase “for some time” dates at least to 2009;
- b. If Avista does not confirm in response to subpart (a), please explain—with specific reference to Avista’s response to ICNU DR 101, which affirms that “the Schedule 1 return ratio from the Company’s base case electric cost of service studies as filed,” since 2009, have always been below two-thirds of unity (i.e., 0.66 or less);
- c. Please confirm that “too far away from the overall rate of return (unity)” means, at the very least, below two-thirds of unity; and
- d. If Avista does not confirm in response to subpart (c), please explain what the phrase “too far away from the overall rate of return (unity)” means in terms of a specific return ratio threshold.

RESPONSE:

- a. Confirmed
- b. N/A
- c. Confirmed
- d. N/A