

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION STAFF
RESPONSE TO DATA REQUEST

DATE PREPARED: 11-21-17
DOCKET: UE-170485/UG-170486
REQUESTER: ICNU

WITNESS: Elizabeth O'Connell
RESPONDER: Elizabeth O'Connell
TELEPHONE: 360-664-1306

REQUEST NO. 10:

Refer to O'Connell, Exh. ECO-1T at 8:1-3, which states that "Avista's COSSs show that it significantly ... under-recovers from some of its classes":

- a. Please confirm that the statement regarding significant under-recovery applies to Schedules 1/2;
- b. If Staff does not confirm in response to subpart (a), please identify which classes Staff is referring to, regarding significant under-recovery;
- c. If Staff confirms in response to subpart (a), please confirm that significant under-recovery for these classes has persisted over time; and
- d. If Staff does not confirm in response to subpart (c), please explain how Staff's position differs from that of the Commission and Company in Dockets UE 160228 and UG-160229, Ehrbar, TR. 289:24-290:12—e.g., Commissioner Rendahl asking "... why the residential parody [sic] ratio is so out of alignment," and that "[i]t appears this has been an ongoing issue"; Mr. Ehrbar testifying that "[w]hat we've had persist over time ... for Schedule 1 on the residential side ... is this persistent [] under- ... recovery of costs."

RESPONSE:

- a. Confirmed.
- b. See response to subpart a.
- c. Staff is unsure of the extent or the time horizon that this data request references. Staff notes that there was significant under-recovery in Schedules 1/2 in the cost of service results presented by Avista in the previous General Rate Case.
- d. See response to subpart c.