

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION,

Respondent

DOCKETS UE-240006 & UG-240007
(Consolidated)

COMMISSION STAFF'S MOTION
FOR LEAVE TO FILE REVISED
TESTIMONY OF KRISTEN M.
HILLSTEAD

I. INTRODUCTION

1 Pursuant to WAC 480-07-375(1)(d) and 480-07-460(a)(1)(i), Commission Staff respectfully requests leave to revise the cross-answering testimony of Kristen Hillstead, filed July 3, 2024, as well as the associated revenue requirement models filed in response to Bench Request No. 1, one of which was updated with witness Hillstead's cross-answering testimony. These revisions correct for an error noted by Avista witness Andrews and verified by Staff during preparation for the merits hearing in this matter.

II. BACKGROUND

2 In January 2024, Avista Corporation filed with the Commission a general rate case (GRC) to revise its currently effective tariffs WN U-28 and WN-U-29, which govern the provision of electric and gas service, respectively.¹ The matter was suspended for adjudication and two filings (electric and natural gas) were consolidated.²

¹ *Wash. Utils & Transp. Comm'n v. Avista Corp.*, Dockets 240006 & 240007, Order 01, 1 ¶ 1 (Feb. 27, 2024).

² *Avista Corp.*, Dockets 240006 & 240007, Order 01, at 3-4 ¶¶ 18-24.

3 The Commission adopted a procedural schedule for the orderly disposition of the consolidated matters. That schedule set deadlines for the filing of response, cross-answering and rebuttal testimony.³ Pursuant to that schedule, Staff filed its response testimony and accompanying exhibits on July 3, 2024.⁴ That response case included testimony from Kristen Hillstead concerning Avista’s adjustment 3.14, made to the results of operations of both its electric and gas operations.⁵ Witness Hillstead recommended the removal of a portion of the adjustment because the operations and maintenance expense escalation claimed by Avista was not known and measurable.

4 In August 2024, Staff submitted its cross-answering testimony and Avista submitted its rebuttal case. Staff witness Hillstead updated Staff’s electric revenue requirement model and submitted it as an exhibit to her testimony.⁶ Avista Witness Andrews addressed the adjustment to O&M expense made by witness Hillstead and identified an error.⁷ Specifically, witness Andrews determined that witness Hillstead had removed all O&M expense rather than the escalated amount involved in the adjustment.⁸

5 Staff, in preparing for hearing, has determined that witness Andrews correctly identified an error in witness Hillstead’s proposed adjustment, and thus in the revenue requirement models submitted in response to Bench Request No. 1.

III. ARGUMENT

6 WAC 480-07-460(1)(a)(i) allows parties to revise their testimony with leave from the presiding officer. WAC 480-07-460(1)(b) requires that a party submit a motion for revised or

³ *Wash. Utils & Transp. Comm’n v. Avista Corp.*, Dockets 240006 & 240007, Order 02, Appendix A (Feb. 27, 2024).

⁴ *Avista Corp.*, Dockets 240006 & 240007, Order 02, at Appendix A.

⁵ Hillstead, KMH-1T at 16:6-16, 23:15-24:18.

⁶ See generally KMH-14T.

⁷ Andrews, EMA-6T at 41:3-16.

⁸ Andrews, EMA-6T at 41:3-16.

supplemental testimony as soon as practicable after discovering the need for such revision or supplementation. In considering such motions, the Commission has generally examined the timing of such motions, the prejudice to any other parties, and whether accepting such testimony will disrupt the procedural schedule of the case.⁹

7 The Commission should give Staff leave to revise witness Hillstead’s cross-answering testimony to update its electric and gas revenue requirement models to correct for the error identified by witness Andrews. Staff acknowledges that this motion comes late in the procedural schedule, as the Commission will hear this matter next week. However, the revision corrects an error, ensuring an accurate record for the Commission’s decision in this matter. And granting leave to revise will avoid requiring witness Hillstead to revise her testimony on the stand, which is more efficient administratively.

IV. CONCLUSION

8 For the reasons listed above, Staff respectfully requests that the Commission grant its motion for leave to file the Revised Cross-Answering Testimony of Kristen M. Hillstead and the associated electric and natural gas revenue requirement models..

DATED this 24th day of September 2024.

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⁹ *Id.* at ¶ 7.