

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

**WUTC v. Avista Corporation d/b/a Avista Utilities
Dockets UE-150204 and UG-150205**

**RESPONSE OF PUBLIC COUNSEL AND THE ENERGY PROJECT
TO AVISTA DATA REQUEST NO. 1**

Request No: 1
Directed to: Public Counsel and The Energy Project
Date Received: September 18, 2015
Date Produced: September 24, 2015
Prepared by: Barbara Alexander

**AVISTA DATA REQUEST NO. 1 TO PUBLIC COUNSEL AND THE ENERGY
PROJECT:**

With reference to the testimony of Barbara Alexander (Exh. No. BRA-1T) addressing the Company's AMI Program, please provide the following information:

- a. Please identify each docket/case before any administrative body or commission in which Ms. Alexander has prepared and/or presented testimony or comments addressing the implementation or deployment of AMI.
- b. Concerning those dockets or cases identified in subpart (a.) above, please specifically identify each docket/case in which Ms. Alexander has submitted testimony or comments recommending the implementation of AMI as part of that proceeding.

RESPONSE:

Ms. Alexander's AMI-related testimony is identified in her C.V., attached as Exhibit No. BRA-2 to her testimony. The following list derived from her Exhibit reflects the formal testimony and comments filed in regulatory proceedings related to AMI policies and/or deployment:

Direct and Surrebuttal Testimony on behalf of Maine Office of Public Advocate before the Maine Public Utilities Commission, Central Maine Power Co. Chapter 120 Information (Post ARP 2000) Transmission and Distribution Utility Revenue Requirement and Rate Design And Request for Alternative Rate Plan, Docket No. 2007-215 (August 30, 2007 and February 2008) [AMI deployment]: <https://mpuc-cms.maine.gov/CQM.Public.WebUI/Common/CaseMaster.aspx?CaseNumber=2007-00215>

Testimony on behalf of AARP Maryland before the Maryland Public Service Commission, In the Matter of the Commission's Investigation of Advanced Metering Technical Standards, Demand Side Management Competitive Neutrality, and Recovery of Costs of Advanced Meters and Demand Side Management Programs, Case 9111 (November 2, 2007) [Default Service policies; AMI deployment]: <http://www.psc.state.md.us/> and type the case number in the search window.

Comments on behalf of AARP District of Columbia before the D.C. Public Service Commission, In the Matter of The Application Of Potomac Electric Power Co. For Authorization to Establish A Demand Side Management Surcharge and an Advanced Metering Infrastructure Surcharge And to Establish a DSM Collaborative and an AMI Advisory Group, Formal Case No. 1056 (August 10, September 10, November 13, 2007, April 2008) [Default Service policies; AMI deployment]: <http://www.dcpsc.org/edocket/searchdockets.asp> and type the formal case number in the "select case number" window.

Comments on behalf of Local 223, UWUA before the Michigan Public Service Commission, In the matter, on the Commission's own Motion, to investigate the development of minimum functionality standards and criteria for advanced metering infrastructure (AMI), Case No. U-15620 (August 2008) [Advanced Metering policies and standards]: <http://efile.mpesc.state.mi.us/efile/> and type the case number in the search window.

Comments on behalf of AARP before the Idaho Public Utilities Commission, In the Matter of the Application Of Idaho Power Co. for a Certificate of Public Convenience and Necessity to Install Advanced Metering Infrastructure ("AMI") Technology Throughout its Service Territory, Case No. IPC-E-08-16 (December 2008) [Smart Meter costs and benefits].

Testimony on behalf of UWUA Local 132 before the California Public Utilities Commission, Southern California Gas Co. Advanced Metering Infrastructure, Docket No. A.08-09-023 (April 2009) [Advanced metering deployment]: <http://delaps1.cpuc.ca.gov/CPUCProceedingLookup/f?p=401:1:0> and type the docket number in the "proceedings number search."

Direct Testimony on behalf of Local 223, UWUA before the Michigan Public Service Commission, In the Matter of the application of Detroit Edison Co. for authority to increase its rates, Case No. U-15244 (July 2008) [Customer Service standards; Advanced Metering proposal]: <http://efile.mpesc.state.mi.us/efile/> and type the "case number" in the search window.

Testimony on behalf of AARP before the District of Columbia Public Service Commission, In the Matter of the Application of Potomac Electric Power Co. for Authority to Establish a Demand Side Management Surcharge and an Advanced Metering Infrastructure Surcharge and to Establish a DSM Collaborative and an AMI Advisory Group, Formal Case No. 1056 (June 2009) [Advanced Metering proposal]:

<http://www.dcpsec.org/edocket/searchdockets.asp> and type the formal case number in the window for “select case number.”

Direct Testimony on behalf of the People of the State of Illinois and AARP before the Illinois Commerce Commission, Petition of Commonwealth Edison Co. to Approve and Advanced Metering Infrastructure Pilot, Docket No. 09-0263 (July 2009) [Advanced Metering pilot design and scope]: <http://www.icc.illinois.gov/> and type the docket number in the “e-docket” search window.

Direct Testimony on behalf of the Attorney General of the Commonwealth of Massachusetts before the Massachusetts Department of Public Utilities, Massachusetts Electric Company & Nantucket Electric Company d/b/a National Grid, Smart Grid Pilot Proposal, Docket No. 09-32 (August 2009) [Advanced Metering pilot design]: <http://web1.env.state.ma.us/DPU/FileRoom/dockets/bynumber> and type the docket number in the search window.

Direct Testimony on behalf of the Attorney General of the Commonwealth of Massachusetts before the Massachusetts Department of Public Utilities, Fitchburg Gas and Electric Co., d/b/a/ Unitil, Smart Grid Pilot Proposal, Docket No. 09-31 (August 2009) [Advanced Metering pilot design]: <http://web1.env.state.ma.us/DPU/FileRoom/dockets/bynumber> and type the docket number in the search window.

Direct Testimony on behalf of AARP before the Maryland Public Service Commission, In the Matter of Potomac Electric Power Company and Delmarva Power and Light Company Request for the Deployment of Advanced Meter Infrastructure, Case No. 9207 (October 2009) [Advanced Metering deployment costs and benefits; dynamic pricing proposals]: <http://www.psc.state.md.us/> and type the case number in the search window.

Direct Testimony on behalf of AARP before the Maryland Public Service Commission, Application of Baltimore Gas and Electric Company for Authorization to Deploy A Smart Grid Initiative and to Establish a Tracker Mechanism For the Recovery of Costs, Case No. 9208 (October 2009) [Advanced Metering deployment costs and benefits; dynamic pricing proposals]: <http://www.psc.state.md.us/> and type of the case number in the search window.

Direct Testimony on behalf of the Attorney General of the Commonwealth of Massachusetts before the Massachusetts Department of Public Utilities, NSTAR Electric Co. Smart Grid Pilot Proposal, Docket No. 09-33 (November 2009) [Advanced Metering pilot design]: <http://web1.env.state.ma.us/DPU/FileRoom/dockets/bynumber> and type the docket number in the search window.

Direct Testimony on behalf of the Massachusetts Attorney General, before the Massachusetts Department of Public Utilities, Western Massachusetts Electric Co. Smart Grid Pilot Proposal, Docket D.P.U. 09-34 (May 2010) [Smart Meter and Pricing Pilot evaluation and conditions]:

<http://web1.env.state.ma.us/DPU/FileRoom/dockets/bynumber> and type the docket number in the search window.

Alexander, Barbara, "Dynamic Pricing? Not So Fast. A Residential Consumer Perspective," *The Electricity Journal* (July 2010) [Opposition to Mandatory Time-Based Pricing for residential customers]: (<http://dx.doi.org/10.1016/j.tej.2010.05.014>).

Direct Testimony on behalf of AARP, before the Maryland PSC, Application of Baltimore Gas and Electric Company for Authorization to Deploy a Smart Grid Initiative and to Establish a Tracker Mechanism and For the Recovery of Costs, [Petition for Rehearing] Case No. 9208 (August 2010) [Smart Meter Costs and Benefits; Consumer Protections]: <http://www.psc.state.md.us/> and type the case number in the search window.

Comments on behalf of AARP before the Public Service Commission of the District of Columbia, Pepco's Proposed AMI Consumer Education Plan, Formal Case No. 1056 (March 30, 2011): <http://www.dcpssc.org/edocket/searchdockets.asp> and type the formal case number in the "select case number" window.

Direct Testimony on behalf of AARP before the Maryland Public Service Commission, In the Matter of Potomac Electric Power Co and Delmarva Power and Light Co. Request for the Deployment of Advanced Meter Infrastructure, Case No. 9207 (June 16, 2011) [Analysis of amended AMI business case; costs and benefits; conditions]: <http://www.psc.state.md.us/> and type the case number in the search window.

Direct and Rebuttal testimony on behalf of the Attorney General of Arkansas before the Arkansas Public Service Commission, In The Matter Of The Application Of Oklahoma Gas And Electric Company For Approval Of The Deployment Of Smart Grid Technology In Arkansas And Authorization Of A Recovery Rider And Regulatory Asset, Docket No. 10-109-U (May and June 2011) [Smart Grid costs and benefits; cost recovery; conditions]: http://www.apscservices.info/efilings/docket_search.asp and type in the docket number in the search window.

Direct Testimony on behalf of AARP before the Public Service Commission of the District of Columbia, In the Matter of The Application for Potomac Electric Power Co. for Authority to Increase Existing Retail Rates and Charges for Electric Distribution Service, Formal Case No. 1087 (December 14, 2011) [AMI cost recovery, Reliability Infrastructure Mechanism surcharge, customer care costs]: <http://www.dcpssc.org/edocket/searchdockets.asp> and type the formal case number in the "select case number" window.

Direct Testimony on behalf of AARP and the People of the State of Illinois before the Illinois Commerce Commission, Commonwealth Edison Company, Approval of Multi-Year Performance Metrics Pursuant to Section 16-108(f) and (f-5) of the Public Utilities Act, Docket No. 11-0772 (January 30, 2012).
[Performance Metrics relating to AMI deployment; remote disconnection of service]: <http://www.icc.illinois.gov/> and type the docket number in the "e-docket" search window.

Direct Testimony on behalf of AARP and the People of the State of Illinois before the Illinois Commerce Commission, Ameren Utilities, Approval of Multi-Year Performance Metrics Pursuant to Section 16-108(f) and (f-5) of the Public Utilities Act, Docket No. 12-0089 (March 19, 2012) [Performance Metrics for AMI Deployment; remote disconnection of service]: <http://www.icc.illinois.gov/> and type the docket number in the “e-docket” search window.

Direct and Rebuttal Testimony on behalf of the Massachusetts Office of the Attorney General before the Massachusetts Department of Public Utilities, National Grid 2012 Smart Grid Pilot Proposal, Docket No. D.P.U. 11-129 (April and May 2012) [Analysis of proposed smart meter and dynamic pricing pilot proposal]: <http://web1.env.state.ma.us/DPU/FileRoom/dockets/bynumber> and type the docket number in the search window.

Comments on behalf of AARP before the Maryland Public Service Commission, Dynamic Pricing Implementation Working Group Report, Case Nos. 9207 and 9208 (May 14, 2012) [Design and implementation of Peak Time Rebate programs for Pepco and BGE]: <http://www.psc.state.md.us/> and type the case number in the search window.

Direct and Rebuttal Testimony on behalf of AARP before the Corporation Commission of Oklahoma, Application of Public Service Company of Oklahoma for Adjustment to Rates and Charges and Terms and Conditions of Service for Electric Service in the State of Oklahoma, Cause No. PUD-201300217 (March and May 2014) [AMI cost/benefit analysis and cost recovery; riders and surcharges; customer charge; low income program]: Note: These documents are not available on the OCC’s website and are attached to this Response as Attachments A, B, and C.

Direct and Reply Testimony on behalf of the District of Columbia Government through its Department of Environment before the Public Service Commission of the District of Columbia, In the Matter into the Investigation into the Issues Regarding the Implementation of Dynamic Pricing in the District of Columbia, Formal Case No. 1114 (April and May 2014) [Dynamic pricing policies and programs for residential customers]: <http://www.dcpsc.org/edocket/searchdockets.asp> and type the formal case number in the “select case number” window.

Ms. Alexander’s engagements in each of these proceedings was to evaluate the costs and benefits of AMI as well as the customer bill impacts associated with that investment or to respond to specific policy issues associated with AMI deployment. Ms. Alexander’s testimony on behalf of consumer advocates did not endorse or recommend the approval of AMI deployment or, where such deployment was already approved, she recommended performance metrics, consumer protections, cost recovery and rate design, time varying rate programs, and other conditions of deployment.