

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
STAFF RESPONSE TO BENCH REQUEST

DATE PREPARED: October 22, 2024 DOCKETS: UE-240006-UG-240007 REQUESTER: Bench	WITNESS: Betty Erdahl RESPONDER: Betty Erdahl TELEPHONE: 360-664-1283
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BENCH REQUEST NO. 2:

During the evidentiary hearing on October 1, 2024, in the above-referenced dockets, Commissioner Ann Rendahl asked Staff Witness Erdahl, subject to check, several questions related to Avista’s 2023 provisional plant review. Specifically, a question regarding the number of plant business cases that were included in that review filing.

On March 29, 2024, Avista filed its 2023 Washington Annual Provision Capital Report in Dockets UE-220053 and UG-220054, consolidated. In that filing, Avista provided supporting documents including an excel file labeled “2023 WA Provisional Capital Native Model” (Native Model) and a pdf document labeled “Attachment D.” In the Native Model file within the Tab labeled “Variance Summary - Attachment A,” the Company indicates that Appendix D contains Business Cases not included in direct filing under threshold. It appears that 20 projects were designated in Column F as “Attachment D.” However, in the pdf file labeled Appendix D there are only 17 distinct projects listed in Table No. 1.

On October 8, 2024, Staff filed a Subject to Check letter with the Commission clarifying their review indicates 123 total business cases including eight new business cases.

All parties are asked to provide a response to clarify the discrepancy between documents with dollar values represented for the costs associated for Washington customers only, or if the discrepancy cannot be resolved, provide a response as to the respective party’s understanding of the documents filed in Avista’s 2023 provisional plant review submission.

Further, all parties are asked to brief any legal issues regarding the 2023 provisional plant review process, how the Commission should address any remaining 2023 discrepancy, as well as how the Commission should address future provisional plant review processes.

RESPONSE:

Discrepancy between 17 Projects in the pdf file labeled Attachment D vs 20 Projects in Native Model on Attachment D.

See 240006-07-Staff-RespToBenchReqNo.2-10-22-24-AttachmentA
Tab: “Staff Response BR02 – Attach A”

The difference between the 17 and 20 business cases is due to an oversight by the company not including T&D Reimbursable on the pdf version of Attachment D. The other two differences are referred to in the pdf version of Attachment D at 1, Footnote 1. These costs

are not part of the new business cases referenced in Staff's subject to check letter. They are ongoing costs from 2021 projects.

New Projects

In the subject to check letter, Staff identified eight new projects of which three are included in both the pdf and Native Formats of Attachment D:

1. Asset Monitoring System
2. Clearwater Wind Generation Interconnection
3. CIP v5 Transition – Cyber Asset Electronic Access

Adding the three business cases listed above, to the five business cases listed below make up the eight new cases. All eight new business cases are included the WA Provisional Capital Native Model, Tab: "Variance Summary – Attachment A":

4. Long Lake Stability Enhancement
5. Metro 115kV Substation
6. NexGen Control System Networks
7. Nine Mile Powerhouse Roof Replacement
8. Noxon Rapids Spillgate Refurbishment

See 240006-07-Staff-RespToBenchReqNo.2-10-22-24-AttachmentA-B

Tab: "Staff Response BR02 – Attach B" for a complete list of the eight new business cases, including Washington electric and natural gas costs.