

**WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
PUBLIC COUNSEL RESPONSE TO BENCH REQUEST**

DATE PREPARED: October 22, 2024 DOCKETS: UE-240006 & UG-240007 REQUESTER: Bench	WITNESS: Betty Erdahl RESPONDER: Jean Marie Dreyer TELEPHONE: 206-389-3040
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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 20 business cases cited in Native Attachment A vs 17 business cases cited in pdf Attachment D

*See, 240006-007\_PC Resp to BR-2\_Reconciliation Attach\_10-22-24  
Tab: “PCU Response BR02 – A&D Recon”*

The Avista (the Company) failed to include T&D Reimbursable on the pdf version of Attachment D. Two other 2023 business cases, Payment Card Industry Compliance and Washington

Advanced Metering Infrastructure, represented trailing costs from 2021 projects which were accounted for in the “Misc. accruals reversals, corrections or additional TTP” line and noted in footnote one on Attachment D. Together, these differences account for the discrepancy between the 20 business cases noted in Avista’s Native Model file within the Tab labeled “Variance Summary – Attachment A” and the 17 cases listed in the Company’s pdf “Attachment D.”

#### New Projects

See, 240006-007\_PC Resp to BR-2\_Reconciliation Attach\_10-22-24

Tab: “PCU Response BR02 – 2023 New BC” for a complete list of the eight new business cases, including Washington electric and natural gas costs.

Staff identified eight new business cases in 2023, of which three – Asset Monitoring System, Clearwater Wind Generation Interconnection, and CIP v5 Transition – are noted in Attachment D as under the \$500,000 and +/- 10% TTP Threshold.

These three business cases, along with the following five business cases listed below, comprise the eight new cases for 2023. All eight new business cases are included in the WA Provisional Capital Native Model, Tab: “Variance Summary – Attachment A.”

Additional five business cases:

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