

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION, d/b/a
AVISTA UTILITIES,

Respondent.

DOCKETS UE-190334 and
UG-190335, UE-190222
(*Consolidated*)

PUBLIC COUNSEL RESPONSE TO
STAFF MOTION FOR
SUSPENSION OF PROCEDURAL
SCHEDULE

1. Public Counsel responds to Commission Staff’s Motion for Suspension of Procedural Schedule in Docket UE-190222 (Motion for Suspension) filed on September 26, 2019. The Motion for Suspension was combined with other motions regarding consolidation of the power cost dockets for each of the three electric utilities: Docket UE-190222 (Avista), Docket UE-190324 (Puget Sound Energy), and Docket UE-190458 (Pacific Power & Light) (collectively, “power cost dockets”). This Response does not address Staff’s other motions, but is limited to the Motion for Suspension. Public Counsel will file a separate response to the remaining Staff motions contained in their September 26th filing.
2. Public Counsel supports Staff’s Motion for Suspension. Avista’s Energy Recovery Mechanism (ERM) docket is currently consolidated with Avista’s general rate case (GRC) (Consolidated Dockets UE-190334 and UG-190335). Pursuant to the procedural schedule in the consolidated ERM and GRC dockets, testimony is due on October 3. If the Commission severs and consolidates Docket UE-190222 with the Puget Sound Energy and Pacific Power & Light power cost dockets and commences an adjudication, testimony will need to be filed in that consolidated docket. Filing testimony in the current consolidated ERM/GRC docket will simply

serve to clutter the general rate case and cause administrative burdens on both the Commission and the parties. Parties would be required to re-file ERM testimony filed on October 3, along with any additional testimony relating to Puget Sound Energy and Pacific Power, in the consolidated power cost dockets pursuant to a procedural schedule set in those matters.

3. Public Counsel stands ready to file our testimony in Docket UE-190222 on October 3 if the procedural schedule is not suspended. However, we believe that doing so would cause more clutter and confusion than if the testimony deadline is suspended until the Commission decides whether to consolidate the three electric power cost dockets. In the event that the Commission decides not to consolidate the power cost dockets, the consolidated ERM/GRC can address adding the power cost testimony back into the procedural schedule without prejudice to any party. As a result, Public Counsel respectfully urges the Commission to grant Staff's Motion for Suspension.

Dated this 1st day of October 2019.

ROBERT W. FERGUSON
Attorney General

/s/ Lisa W. Gafken
LISA W. GAFKEN
Assistant Attorney General
Public Counsel Unit Chief
WSBA No. 31549