

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-20 _____

DIRECT TESTIMONY OF

JEFF A. SCHLECT

REPRESENTING AVISTA CORPORATION

1 **I. INTRODUCTION**

2 **Q. Please state your name, employer and business address.**

3 A. My name is Jeff A. Schlect. I am employed by Avista Corporation as Senior
4 Manager, FERC Policy and Transmission Services. My business address is 1411 East
5 Mission, Spokane, Washington.

6 **Q. Please briefly describe your educational background and professional**
7 **experience.**

8 A. I am a 1988 graduate of Washington State University with a degree in
9 Electrical Engineering. I spent five years with Puget Sound Energy in distribution engineering
10 and operations positions prior to joining the Company in 1993 as a Transmission Planning
11 Engineer. Over the past 26 years, in addition to stints in Customer Service and Power Supply
12 I have worked primarily in the Transmission Operations area with responsibilities covering
13 Federal Energy Regulatory Commission (FERC) transmission policy and compliance with
14 open access transmission regulations, transmission contracts, transmission and generation
15 interconnection processes, and regional transmission policy coordination. I have authored
16 testimony in Bonneville Power Administration (BPA) power and transmission rate
17 proceedings, testimony in general rate cases in Washington and Idaho, and provided comment
18 before the U.S. Senate Subcommittee on Water and Power. In my current role I have
19 responsibility for all transmission revenue and expenses and provide support to the
20 Company's transmission capital planning process.

21 **Q. What is the scope of your testimony?**

22 A. My testimony presents Avista's transmission revenues and expenses included
23 in the Company's request for rate relief effective October 1, 2021.

1 A table of contents for my testimony is as follows:

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7 **Q. Are you sponsoring any exhibits?**

8 A. Yes. Exh. JAS-2 provides the transmission expense and revenue during the
 9 rate effective period October 1, 2021 through September 30, 2022. Additionally, supporting
 10 workpapers for each of the expense and revenue items have been included with the Company’s
 11 filed case.

12
 13 **II. TRANSMISSION EXPENSES**

14 **Q. Please describe the adjustments to the twelve-months-ended December 31,**
 15 **2019 test year transmission expenses, to arrive at transmission expenses included in this**
 16 **case effective October 1, 2021.**

17 A. Adjustments were made in this filing to incorporate updated information for
 18 any changes in transmission expenses from the 2019 test year to that used in this case effective
 19 October 1, 2021. As outlined in Exh. JAS-2, I have provided the expected changes in
 20 transmission expenses from the 2019 test period. As described below, transmission expenses
 21 during the rate year are expected to be \$681,000 less than in the 2019 test year on a system
 22 basis. Company witness Ms. Andrews pro forms the Washington share of this level of
 23 transmission expense within her requested revenue requirement in this case. The changes in
 24 expenses and a description of each is summarized in Table No. 1 below, and an explanation

1 of each change follows the table. Each expense item described below is at a system level and
 2 is included in Exh. JAS-2.

3 **Table No. 1: Transmission Expense Adjustment**
 4

Transmission Expense Adjustment			
			System⁽¹⁾
ColumbiaGrid General Funding			\$ (62,000)
ColumbiaGrid PEFA			(157,000)
ColumbiaGrid Order 1000			(25,000)
NorthernGrid			87,000
NERC CIP			21,000
PEAK Reliability			(928,000)
RC West			383,000
Total Transmission Expense Adjustment			\$ (681,000)
(1) Represents the change in expenses above or below the 2019 historical test year level.			

15
 16 Avista became a member of the ColumbiaGrid regional transmission organization in
 17 2006. Following extensive regional discussions to develop a combined regional transmission
 18 planning organization encompassing both the ColumbiaGrid and Northern Tier Transmission
 19 Group footprints, the NorthernGrid structure was developed and ultimately accepted by the
 20 Federal Energy Regulatory Commission (FERC) effective April 1, 2020. Following
 21 completion of its final transmission planning cycle, ColumbiaGrid will cease operations as of
 22 December 31, 2020. NorthernGrid contracts with the Northwest Power Pool to perform a
 23 number of its administrative functions and some activities previously performed by
 24 ColumbiaGrid are expected to be absorbed by the transmission planning staffs of the
 25 NorthernGrid participants. In total, the Company's coordinated regional transmission
 26 planning expenses in the 2019 test year were \$260,000. With the transition to NorthernGrid,

1 these expenses are expected to be reduced by \$157,000 to a total of \$103,000 during the rate
2 period, as described below.

3 ColumbiaGrid General Funding (-\$62,000) – As noted above, with the dissolution of
4 ColumbiaGrid at the end of 2020, the Company will have no ColumbiaGrid general funding
5 expenses during the rate period.

6 ColumbiaGrid PEFA (-\$157,000) – As noted above, with the dissolution of
7 ColumbiaGrid at the end of 2020, the Company will have no ColumbiaGrid PEFA expenses
8 during the rate period.

9 ColumbiaGrid Order 1000 (-\$25,000) – As noted above, with the dissolution of
10 ColumbiaGrid at the end of 2020, the Company will have no ColumbiaGrid Order 1000
11 expenses during the rate period.

12 NorthernGrid (+\$87,000) – With FERC’s acceptance of the Company’s revised open
13 access transmission tariff language, effective April 1, 2020, to incorporate the new
14 NorthernGrid regional transmission planning structure, the Company now meets its
15 coordinated regional transmission planning requirements, as set forth in FERC Order 890,
16 through NorthernGrid.¹ The Company’s NorthernGrid expenses during the 2019 test year
17 were for initial developmental activities. Based upon its 2020 expenses, the Company expects
18 its NorthernGrid expenses to be \$103,000 during the rate period. Accordingly, the Company’s

¹ As outlined in the Company’s Attachment K to its Open Access Transmission Tariff, NorthernGrid coordinates regional grid expansion planning among the transmission entities in the NorthernGrid area. The goal of grid expansion planning is to determine reasonable solutions to transmission grid issues pertaining to serving load and complying with reliability standards. While the Company is required by FERC to participate in a coordinated regional planning process, the biennial transmission planning process under NorthernGrid is enhanced by the participation of state representatives and many non-FERC jurisdictional entities, including BPA, with whom the Company has more transmission interconnections than with any other entity.

1 expected NorthernGrid expenses are an additional \$87,000 over its level of NorthernGrid
2 expenses during the 2019 test year.

3 Additional changes to transmission expenses, totaling a net reduction of \$524,000, are
4 also necessary to reflect the proper rate period level of transmission expense, as follows:

5 NERC Critical Infrastructure Protection (CIP) (+\$21,000) – The Company has
6 purchased several software and hardware products to assist in protecting critical transmission
7 control systems from intrusion and to meet applicable North American Electric Reliability
8 Corporation (NERC) standards. These products provide for physical security, intrusion
9 detection, virus protection and vulnerability assessment. The Company's NERC CIP
10 expenses are expected to be \$73,000 during the rate period, an increase of \$21,000 from the
11 2019 test year actual expenses of \$52,000.

12 Peak Reliability – Reliability Coordination (-\$928,000) – In mid-year 2018, Peak
13 Reliability announced that it would cease performing reliability coordination services at the
14 end of 2019. The Company subsequently began work, along with many other Balancing
15 Authorities in the west, to transition obtaining its required reliability coordination services
16 from Peak Reliability to the California Independent System Operator (CAISO). The
17 Company's Peak Reliability expense during the 2019 test year were \$928,000. With the
18 dissolution of reliability coordination services from Peak Reliability effective at the end of
19 2019, the Company will have no expenses for Peak Reliability during the rate period.

20 RC West – Reliability Coordination (+\$383,000) – With the dissolution of Peak
21 Reliability, the Company has transitioned to obtaining its reliability coordination services
22 from RC West, a functional arm of the CAISO. The Company is required to obtain reliability
23 coordination services under NERC standards. The Company's RC West expenses during the

1 2019 test year of \$29,000 were to obtain Hosted Advanced Network Application (HANA)
 2 services to meet other NERC standards, separate from the requirement to obtain reliability
 3 coordination services. Based upon 2020 RC West expenses, the Company expects its
 4 reliability coordination expenses to be \$412,000 during the rate period, an increase of
 5 \$383,000 over the 2019 test year actual expense of \$29,000.

6

7

III. TRANSMISSION REVENUES

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9

Q. Please describe the adjustments to 2019 test year transmission revenues to arrive at transmission revenues included in this case effective October 1, 2021.

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A. Adjustments have been made in this filing to incorporate updated information for transmission revenue from the 2019 test year to that used in this case effective October 1, 2021. As outlined in Exh. JAS-2, I have provided the expected changes in transmission revenues from the 2019 test year.²

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15

16

Each revenue item described below is at a system level and is included in Exh. JAS-2. Ms. Andrews has pro formed the transmission revenues within the revenue requirement in this case, reducing transmission revenues by \$2,105,000 effective October 1, 2021.³

² Transmission Revenues (FERC Account 456 other Electric Revenue) are included and tracked as a part of the Company's Energy Recovery Mechanism (ERM). The total transmission revenue of \$16.146 million is therefore included in Company witness Mr. Kalich Exh. CGK-5 reflecting the proposed ERM net base power supply expense, offset by transmission revenues, representing the proposed "Total Authorized Expense" on a system (Washington and Idaho) basis. Washington's share of the net power supply revenues and expenses is equal to 65.64% of the system total, based on the Production /Transmission (P/T) ratio updated annually in December.

³ As discussed by Ms. Andrews, transmission revenues are adjusted from the 2019 historical test period level of \$18.251 million to the pro forma level of \$16.146 million in two adjustments – an overall reduction of \$2.105 million on a system basis, or \$1.382 million Washington share. First, actual transmission revenues are restated downward from \$18.251 million to the current authorized transmission revenues of \$15.149 million in restating Adjustment 2.18 (Authorized Power Supply). Second, in Pro Forma adjustment 3.00T (Pro Forma Transmission Revenues/Expenses), transmission revenues are adjusted upward from current authorized \$15.149 million to the proposed authorized level of \$16.146 million. The net impact of both adjustments result in a net reduction in transmission revenues of \$2.105 million (\$1.382 million Washington share).

1 Table No. 2 provides a detailed summary of the changes in transmission revenues, as
 2 well as a listing of transmission revenues not changing at this time. An explanation of each
 3 follows the table.

4 **Table No. 2: Transmission Revenue Adjustment**

Transmission Revenue Adjustment			
			System⁽¹⁾
<u>Transmission Service</u>			
	OASIS (Non-Firm and ST Firm)		\$ (812,000)
	Bonneville Power Administration		0
	Consolidated Irrigation District		0
	East Greenacres Irrigation District		0
	Grant County PUD No. 3		0
	Spokane Tribe of Indians		(11,000)
	Seattle City Light/Tacoma Power (Main Canal)		0
	Seattle City Light/Tacoma Power (Summer Falls)		0
	Pacificorp (Dry Gulch)		0
	City of Spokane Waste to Energy		0
	Stimson Lumber Company		0
	Hydro Technology Systems		0
	Deep Creek Energy LLC		0
	Kootenai Electric Cooperative		0
<u>Parallel Capacity Support</u>			
	Bonneville Power Administration		0
<u>Operations and Maintenance (O&M)</u>			
	Columbia Basin Hydropower		0
	Palouse Wind		0
	Adams Neilson Solar		0
	Rattlesnake Flat		70,000
<u>Ancillary Services</u>			
	Bonneville Power Administration		(1,370,000)
	Consolidated Irrigation District		0
	East Greenacres Irrigation District		0
	Spokane Tribe of Indians		0
	Kootenai Electric Cooperative		0
<u>Low-Voltage Facilities</u>			
	Consolidated Irrigation District		1,000
	East Greenacres Irrigation District		12,000
	Spokane Tribe of Indians		5,000
	Bonneville Power Administration		0
			\$ (2,105,000)

(1) Represents the change in revenue above or below the 2019 historical test year level.

1 The Company provides transmission service to wholesale customers under the
2 jurisdiction of the FERC. The components of what has traditionally been known as
3 “wheeling” service include: (i) transmission service over the Company’s transmission
4 facilities that are operated at or above 115kV, (ii) operations and maintenance (O&M) charges
5 associated with Company transmission assets for which an interconnection customer provided
6 contributions in aid to construction, (iii) ancillary services (generation-related services that
7 are required to be offered in conjunction with transmission service), and (iv) low-voltage
8 wheeling services over substation and distribution facilities that are operated below 115kV.

9 OASIS Non-Firm and Short-Term Firm Transmission Service (-\$812,000) – OASIS
10 is an acronym for Open Access Same-time Information System. This is the system used by
11 electric transmission providers for selling available transmission capacity to eligible
12 customers. The terms and conditions under which the Company sells its transmission capacity
13 via its OASIS are pursuant to FERC regulations and Avista’s Open Access Transmission
14 Tariff. Consistent with prior Avista general rate cases, the Company calculates its rate year
15 adjustments using a three-year average of actual OASIS Non-Firm and Short-Term Firm
16 revenue. OASIS transmission revenue may vary significantly depending upon a number of
17 factors, including current wholesale power market conditions, forced or planned generation
18 resource outage situations in the region, the current load-resource balance status of regional
19 load-serving entities, and the availability of parallel transmission paths for prospective
20 transmission customers.

21 The use of a three-year average is intended to strike a balance in mitigating both long-
22 term and short-term impacts to OASIS revenue. A three-year period is intended to be long
23 enough to mitigate the impacts of non-substantial temporary operational conditions (for

1 generation and transmission) that may occur during a given year, and short-enough so as to
2 not dilute the impacts of long-term transmission and generation topography changes (e.g.,
3 major transmission projects which may impact the availability of the Company's transmission
4 capacity or competing transmission paths, and major generation projects which may impact
5 the load-resource balance needs of prospective transmission customers). If there are known
6 events or factors that occurred during the period that would cause the average to not be
7 representative of future expectations, then adjustments may be made to the three-year average
8 methodology. However, volatility in OASIS revenue from year-to-year can be expected,
9 entirely outside the scope and purview of the Company as a transmission provider. For
10 example, the Company experienced several months of higher-than-normal OASIS revenues
11 between November 2018 and March 2019 due most likely to the loss of a major natural gas
12 transportation pipeline in western British Columbia. It appears that the impact of this event
13 upon the dispatch of generation resources in the region facilitated increased short-term use of
14 the Company's transmission system. In this filing, the Company is using a three-year average
15 for the time period of January 2017 to December 2019. The OASIS revenue for the 2019 test
16 year was \$5.474 million and the three-year average calculated for the rate period is \$4.662
17 million, or a reduction of \$812,000.

18 Bonneville Power Administration – Transmission (\$0) – The Company provides
19 Network Integration Transmission Service to the Bonneville Power Administration (BPA)
20 under a series of thirteen agreements serving BPA's utility customers connected to the
21 Company's transmission system. Network Service revenue is based upon a rolling 12-month
22 average of BPA's loads. BPA Network Service revenue was \$6.413 million for the 2019 test

1 year. The Company expects no substantive change in BPA Network Service revenue during
2 the rate period.

3 Consolidated Irrigation District – Transmission (\$0) – The Company provides Long-
4 Term Firm Point-to-Point Transmission Service to the Consolidated Irrigation District under
5 an agreement effective through September 30, 2021. The Company expects a new follow-on
6 long-term agreement to become effective October 1, 2021. Consolidated Irrigation
7 transmission revenue was \$32,000 for the 2019 test year and the Company expects there will
8 be no change during the rate period.

9 East Greenacres Irrigation District – Transmission (\$0) – The Company provides
10 Long-Term Firm Point-to-Point Transmission Service to East Greenacres Irrigation District
11 under an agreement effective through September 30, 2024. East Greenacres transmission
12 revenue was \$11,000 for the 2019 test year and the Company expects there will be no change
13 during the rate period.

14 Grant County PUD – Transmission (\$0) – The Company provides long-term
15 transmission service to Grant County PUD for service to its Coulee City and Wilson Creek
16 loads connected to the Company’s transmission system. Revenue under the Power Transfer
17 Agreement was \$28,000 for the 2019 test year and the Company expects there will be no
18 substantive change during the rate period.

19 Spokane Tribe of Indians – Transmission (-\$11,000) – The Company provides Long-
20 Term Firm Point-to-Point Transmission Service to the Spokane Tribe of Indians under an
21 agreement that became effective January 1, 2020 and will be effective through December 31,
22 2024. Point-to-point transmission charges under the Company’s federal load transmission
23 service contracts need to align with what the customer would be expected to pay under a

1 Network Integration Transmission Service agreement. Accordingly, the transmission rate
2 under the new agreement with the Spokane Tribe was adjusted downward to meet this
3 condition. Spokane Tribe transmission revenue was \$29,000 for the 2019 test year and the
4 Company expects it to be \$18,000 during the rate period, a reduction of \$11,000.

5 Seattle and Tacoma – Main Canal Transmission (\$0) – The Company provides Long-
6 Term Firm Point-to-Point Transmission Service to the City of Seattle and Tacoma Power,
7 under agreements effective through October 31, 2026, to transfer output from the Main Canal
8 hydroelectric project, net of local Grant County PUD load service, to the Company’s
9 transmission interconnections with Grant County PUD. Service is provided during the eight
10 months of the year (March through October) in which the Main Canal project operates, and
11 the agreements include a three-year ratchet demand provision. Revenues under these
12 agreements totaled \$350,000 during the 2019 test year and the Company expects there will be
13 no change during the rate period.

14 Seattle and Tacoma – Summer Falls Transmission (\$0) – The Company provides long-
15 term use-of-facilities transmission service to the City of Seattle and Tacoma Power, under
16 agreements effective through October 31, 2024, to transfer output from the Summer Falls
17 hydroelectric project across the Company’s Stratford Switching Station facilities to the
18 Company’s Stratford interconnection with Grant County PUD. Charges under these use-of-
19 facilities arrangements are based upon the Company’s investment in its Stratford Switching
20 Station and are not impacted by the Company’s transmission service rates under its Open
21 Access Transmission Tariff. Revenues under these two agreements totaled \$180,000 in the
22 2019 test year and the Company expects there will be no change during the rate period.

1 PacifiCorp – Dry Gulch Transmission (\$0) – The Company provides long-term
2 transmission service under a use-of-facilities agreement with PacifiCorp for use of the
3 Company’s Dry Gulch Substation. The agreement includes a twelve-month rolling ratchet
4 provision. Revenue under the Dry Gulch agreement was \$278,000 during the 2019 test period
5 and the Company expects there will be no change during the rate period.

6 City of Spokane – Waste to Energy Transmission (\$0) – The City of Spokane pays a
7 use-of-facilities charge for the ongoing use of its interconnection to the Company’s
8 transmission system. Use-of-facilities charges were \$28,000 for the 2019 test year and the
9 Company expects there to be no change during the rate period.

10 Stimson Lumber PURPA (\$0) – Low-voltage facilities associated with the Company’s
11 Plummer Substation are dedicated for use by Stimson Lumber under a PURPA arrangement.
12 Low-voltage use-of-facilities revenue was \$9,000 for the 2019 test year and there will be no
13 change during the rate period.

14 Hydro Tech Systems PURPA (\$0) – Low-voltage facilities in the Company’s
15 Greenwood Substation are dedicated for use by the Meyers Falls generation project under a
16 PURPA arrangement. Low-voltage use-of-facilities revenue was \$6,000 during the 2019 test
17 year and there will be no change during the rate period.

18 Deep Creek PURPA (\$0) – The Company owns and operates low voltage facilities
19 that are dedicated for use by the Deep Creek generation project under a PURPA arrangement.
20 Low-voltage use-of-facilities revenue was less than \$1,000 during the 2019 test year and there
21 will be no change during the rate period.

22 Kootenai Electric Cooperative – Transmission (\$0) – The Company provides Long-
23 Term Firm Point-to-Point Transmission Service to Kootenai Electric Cooperative under an

1 agreement effective through March 31, 2024. Transmission revenue was \$72,000 for the 2019
2 test year and the Company expects there will be no change during the rate period.

3 Columbia Basin Hydropower (\$0) – The Company provides operations and
4 maintenance services on the Stratford-Summer Falls 115kV Transmission Line to Columbia
5 Basin Hydropower (formerly known as the Grand Coulee Project Hydroelectric Authority)
6 under a contract signed in March 2006. These services are provided for a fixed annual fee.
7 Annual charges under this contract were \$8,000 in the 2019 test year and there will be no
8 change during the rate period.

9 Palouse Wind O&M (\$0) – Per the Company’s interconnection agreement with the
10 Palouse Wind project, the interconnection customer pays O&M fees associated with directly-
11 assigned interconnection facilities owned and operated by the Company. O&M revenue for
12 the 2019 test year was \$52,000 and the Company expects there will be no change during the
13 rate period.

14 Adams Neilson Solar O&M (\$0) – Per the Company’s interconnection agreement with
15 the Adams Neilson Solar project, the interconnection customer pays O&M fees associated
16 with directly-assigned interconnection facilities owned and operated by the Company. O&M
17 revenue for the 2019 test year was \$9,000 and the Company expects there will be no change
18 during the rate period.

19 Rattlesnake Flat O&M (\$70,000) – Per the Company’s interconnection agreement
20 with the Rattlesnake Flat Wind project, the interconnection customer will begin paying O&M
21 fees associated with directly-assigned interconnection facilities owned and operated by the
22 Company. The Rattlesnake Flat Wind project is expected to reach commercial operation in

1 November 2020. The Company expects revenue of approximately \$70,000 during the rate
2 period.

3 Bonneville Power Administration – Parallel Capacity Support (\$0) – The Company
4 and BPA executed a Parallel Capacity Support Agreement effective February 1, 2017, and
5 with a minimum term to December 31, 2026, in which the Company provides BPA with
6 parallel transmission capacity in support of BPA’s integration of several wind resource
7 projects. Revenue was \$924,000 during the 2019 test year and there will be no change during
8 the rate period.

9 Bonneville Power Administration – Ancillary Services (-\$1,370,000) – The Company
10 provides Ancillary Services to BPA under its Network Integration Transmission Service
11 agreements. BPA provided notice to the Company that it intends to self-supply operating
12 reserves under these agreements. Following substantial negotiations, BPA’s self-supply of
13 operating reserves became the subject of FERC Docket No. EL20-36-000 wherein FERC
14 ruled primarily in BPA’s favor with respect to the implementation of self-supplied operating
15 reserves. BPA will begin its self-supply of operating reserves on or about January 1, 2021.
16 BPA Ancillary Services revenue was \$2,464,000 during the 2019 test year and the Company
17 expects this revenue to be approximately \$1,094,000 during the rate period, a reduction of
18 \$1,370,000.

19 Consolidated Irrigation District – Ancillary Services (\$0) – The Company provides
20 Ancillary Services to the Consolidated Irrigation District under its Long-Term Firm Point-to-
21 Point Transmission Service agreement. Ancillary Service revenue was \$9,000 for the 2019
22 test year and the Company expects there will be no change during the rate period.

1 East Greenacres Irrigation District – Ancillary Services (\$0) – The Company provides
2 Ancillary Services to East Greenacres Irrigation District under its Long-Term Firm Point-to-
3 Point Transmission Service agreement. Ancillary Service revenue was \$6,000 for the 2019
4 test year and the Company expects there will be no change during the rate period.

5 Spokane Tribe of Indians – Ancillary Services (\$0) – The Company provides Ancillary
6 Services to the Spokane Tribe of Indians under its Long-Term Firm Point-to-Point
7 Transmission Service agreement. Ancillary Service revenue was \$6,000 for the 2019 test year
8 and the Company expects there will be no change during the rate period.

9 Kootenai Electric Cooperative – Ancillary Services (\$0) – The Company provides
10 Ancillary Services to Kootenai Electric Cooperative under its Long-Term Firm Point-to-Point
11 Transmission Service agreement. Ancillary Service revenue was \$23,000 for the 2019 test
12 year and the Company expects there will be no change during the rate period.

13 Consolidated Irrigation District – Low-Voltage (+\$1,000) – The Company provides
14 transfer service over low voltage facilities to Consolidated Irrigation District under the
15 Electric Distribution Services Agreement, effective through September 30, 2021. Per the rate
16 adjustment provisions in this agreement the Company adjusted charges upward effective April
17 1, 2020. Low-voltage charges were \$88,000 during the 2019 test period and the Company
18 expects them to be \$89,000 during the rate period, an increase of \$1,000.

19 East Greenacres Irrigation District – Low-Voltage (+\$12,000) – The Company
20 provides transfer service over low voltage facilities to East Greenacres Irrigation District
21 under the Electric Distribution Services Agreement, which became effective January 1, 2020,
22 and will be effective through September 30, 2024. Low-voltage charges were \$51,000 during

1 the 2019 test period and charges under the new agreement will be \$63,000 during the rate
2 period, an increase of \$12,000.

3 Spokane Tribe of Indians – Low-Voltage (+\$5,000) – The Company provides transfer
4 service over low voltage facilities to the Spokane Tribe of Indians under the Electric
5 Distribution Services Agreement, which became effective January 1, 2020 and will be
6 effective through December 31, 2024. Low-voltage charges were \$20,000 during the 2019
7 test period and charges under the new agreement will be \$25,000 during the rate period, an
8 increase of \$5,000.

9 Bonneville Power Administration – Low-Voltage (\$0) – The Company provides
10 transfer service over low-voltage facilities to BPA under its Network Integration Transmission
11 Service agreements. BPA low-voltage revenue was \$1,680,000 during the 2019 test year and
12 the Company expects there to be no change during the rate period.

13 **Q. Does this complete your pre-filed direct testimony?**

14 A. Yes, it does.