

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

Complainant,

v.

AVISTA CORPORATION d/b/a AVISTA  
UTILITIES

Respondent.

DOCKETS UE-100467 and  
UG-100468

RESPONSE OF COMMISSION  
STAFF TO AVISTA  
CORPORATION'S MOTION FOR  
A WAIVER OF THE PAPER-  
FILING REQUIREMENTS OF  
WAC 480-07-510

1 Commission Staff has reviewed the motion of Avista Corporation ("Avista") for a waiver of the paper-filing requirements of WAC 480-07-510. In particular, Avista asks that it be granted an exemption from the requirement to file nineteen copies of certain exhibits sponsored by its witnesses Mr. Storro, Mr. Kinney, and Mr. Kensok. The exhibits pertain to various generation, transmission, and distribution projects, as well as to certain technology and information service initiatives. Avista states that the exhibits have been submitted in support of several proposed proforma capital and expense adjustments. Avista proposes to provide (outside of one paper copy for the official record) only an electronic version of these exhibits, and requests that the paper-filing requirement be waived altogether.

2 While Staff is cognizant of the volume of the exhibits in question, Staff also believes that it is not reasonable for the Commission to require that Staff (as well as other parties) attempt to review, audit, and analyze all of this information solely in an electronic format, on a screen-by-screen basis. Even though Avista states that it has provided an electronic

index of the materials in question, the fact remains that Staff will need to have some hard copies of the exhibits in order to properly and completely do its work in this case.


Furthermore, it is not reasonable to require that Staff produce these hard copies; rather, that burden should remain with Avista.

3 Staff, therefore, respectfully requests that the Commission require Avista to provide Staff with three paper copies of all the exhibits referenced in Avista's motion. Staff cannot determine how many paper copies the Commission may need for its own purposes. Staff does not object to the Commission requiring Avista to file fewer than nineteen paper copies of the materials in total, as long as Avista provides Staff with three copies of all such materials.

DATED this 29<sup>th</sup> day of March 2010.

Respectfully submitted,

ROBERT M. MCKENNA  
Attorney General

  
GREGORY J. TRAUTMAN  
Assistant Attorney General  
Counsel for Washington Utilities and  
Transportation Commission Staff