

Davison Van Cleve PC

Attorneys at Law

TEL (503) 241-7242 • FAX (503) 241-8160 • tcp@dvclaw.com
1750 SW Harbor Way, Suite 450
Portland, OR 97201

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Via Electronic Filing

Mr. Mark L. Johnson
Executive Director & Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

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State Of WASH.
UTIL. AND TRANSP.
COMMISSION

Re: WUTC v. Avista Corp. d/b/a Avista Utilities
Dockets UE-190334, UG-190335, and UE-190222 (Consolidated)

Dear Mr. Johnson:

Pursuant to Paragraph 9 of the Washington Utilities and Transportation Commission's ("Commission") Order 04 in the above-referenced docket, the Alliance of Western Energy Consumers ("AWEC") identifies the following issues it intends to raise in testimony in Docket UE-190222:

1. In Response Testimony filed in the remand phase of Dockets UE-150204/UG-150205 (*Consolidated*), AWEC noted that the ERM baseline was established assuming a higher level of power costs than Avista forecasted in an October 29, 2015 update to the baseline. *See* Exh. No. BGM-7T at 29:11-30:11. If the lower amount Avista had forecasted were used, it would have resulted in higher deferral balances in the ERM now owing to customers. AWEC intends to raise this issue in Response Testimony in UE-190222.
2. AWEC intends to recommend that interest on the deferred balances owing to customers be calculated at Avista's pre-tax cost of debt.
3. AWEC intends to recommend that the Commission require Avista to amortize the full amount of the approved ERM balance, plus interest, over a two-year period, beginning April 1, 2020 and that, if amortization is delayed beyond April 1, 2020, that incremental 2019 deferral balances be included in the rebate amount.

Sincerely,

/s/ Tyler C. Pepple

Tyler C. Pepple

Davison Van Cleve, P.C.

Counsel for the Alliance of Western Energy Consumers

cc: Service List