

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a AVISTA UTILITIES,

Respondent.

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DOCKET NOS. UE-190334 and UG-190335, UE-190222 (*Consolidated*)

**GLENN A. WATKINS**

**ON BEHALF OF PUBLIC COUNSEL**

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**EXHIBIT GAW-4C**

Avista Responses to Public Counsel Data Request Nos. 88C

with Confidential Attachment A

October 3, 2019

REDACTED VERSION

**AVISTA CORP.**  
**RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	07/15/2019
CASE NO:	UE-190334 & UG-190335	WITNESS:	Joseph Miller
REQUESTER:	Public Counsel	RESPONDER:	Joe Miller
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC-088	TELEPHONE:	(509)495-4546
		EMAIL:	joe.miller@avistacorp.com

**REQUEST:**

For each special or negotiated rate customer (account), please provide:

- (a) all analyses, workpapers, and documents supporting the current need for a special (negotiated) rate;
- (b) the approximate date in which the most recent analyses supporting the need for a special (negotiated) rate was conducted;
- (c) indication if the service is firm or interruptible, if both, provide the amount of firm contract demand;
- (d) an itemization of the gross investment relating to all dedicated facilities to serve each customer including: meter(s); service lines; regulating or compressing equipment; and, main spurs;
- (e) if the stated reason for a special or negotiated rate is threat of bypass, provide a detailed map or schematic showing the customers location along with all dedicated facilities and the nearest transmission main or other source of bypass;
- (f) if the stated reason for a special or negotiated rate is an alternative fuel source, provide the alternative fuel(s) along with all analyses supporting the breakeven point between the alternative fuel and natural gas; and
- (g) if the stated reason for a special or negotiated rate is other than a threat of bypass or alternative fuel(s), provide all reasons and analyses supporting the need for a special (negotiated) rate.

Please provide all analyses in executable electronic (Excel) format (as available).

**RESPONSE:**

Please see Avista's **CONFIDENTIAL** response to data request no. PC – 088C. Please note that Avista's response to PC – 088C is **Confidential per Protective Order in UTC Dockets UE-190334 and UG-190335**.

- (a) See the Company's response to PC-087C.
- (b) The Company's key Account Executive's periodically monitor special contract customers to ensure that these customers continue to maintain the economic or bypass alternative for which the special contract rate was established. To the extent these customers economic or bypass alternative changes, the Company would then conduct a new economic analysis. All special contract customers have maintained their bypass alternatives and therefore the Company has not conducted any new analysis.

The Company is aware that the frequency and inclusion of Special Contracts is an on-going issue being discussed in the Cost of Service Rule Making Dockets (UE-170002 and UG-170003). The Company looks forward to continuing to work with the parties in the formal rule making setting to formalize the requirements around Special Contracts.

(c) Please see PC – 088C

(d) The Company has not conducted such an analysis and therefore is unable to provide the requested information.

(e) Please see PC – 088C.

(f) N/A

(g) N/A

Avista's Response to Public Counsel Data  
Request No. 88C,  
confidential Attachment A (five pages)  
is redacted in its entirety.