

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a AVISTA UTILITIES,

Respondent.

DOCKET NOS. UE-200900 and UG-200901 (*Consolidated*)

ANDREA C. CRANE

**ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT ACC-14

Avista Response to Public Counsel Data Request No. 241

April 21, 2021

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	03/15/2021
CASE NO.:	UE-200900 & UG-200901	WITNESS:	Heather Rosentrater/K. Schultz
REQUESTER:	Public Counsel	RESPONDER:	Glenn Madden/ K. Schultz
TYPE:	Data Request	DEPT:	Substation Engineering
REQUEST NO.:	PC - 241	TELEPHONE:	(509) 495-2146
		EMAIL:	glenn.madden@avistacorp.com

SUBJECT: Substation Rebuilds Program

REQUEST:

Please refer to Attachments A–J provided by Avista in their response to Public Counsel Data Request No. 101.

- a) For each Attachment/project, provide the amount added to the rate base since the last rate case.
- b) For each Attachment/project, provide the amount of accumulated depreciation associated with the amounts provided in response to subpart (a) as of the end of the test period in this rate case.
- c) Provide the amount estimated for the Colville Transformer No. 2 replacement (not provided on Attachment E).
- d) Some Attachments do not identify any alternative to the work proposed. For each such Attachment, explain why the project was approved without a consideration of available alternatives.
- e) Some Attachments identify alternatives to the work proposed. For each such alternative identified, provide the estimated benefits and costs of the approved project, and the estimated benefits and costs of the identified alternatives, along with all associated business cases, worksheets, workbooks, models, cost-benefit analysis, or any other calculations used to calculate these benefit and cost estimates.
- f) For each attachment, provide any and all business cases, worksheets, workbooks, models, cost-benefit analyses, or any other calculations, presentations, requests, standards, other documentation, or industry publications which show that the value in dollars of the proposed work to customers exceeds the cost of the proposed work to customers.
- g) Provide any substation rebuild Engineering Project Request forms submitted by Avista engineers which were not approved for implementation from 2016 to 2020.

RESPONSE:

- a) Please see PC-DR-241 Attachment A, in the tab labeled “TPP Detail” for the monthly transfers to plant for the projects represented in PC-DR-101 Attachments A-J. The Company’s historical test period in its prior Washington general rate case ended December 31, 2018. Accordingly, plant additions for these projects (less A/D and ADFIT) are provided for the period January 1, 2019 through December 31, 2020.
- b) For the monthly accumulated depreciation associated with the amounts provided in part (a) please see PC-DR-241 Attachment A, in the tab labeled “Summary Cost E.” Accumulated depreciation

for the end of the Company's test period was through December 31, 2019, however, included in the rate base calculation for part (a), above, is the accumulated depreciation for the period ending December 31, 2020.

- c) Please see the Capital Project Request Form for the estimated cost provided as PC-DR-241 Attachment B.
- d) Alternatives to the work proposed are considered but may not be included in the request if they are determined to be not viable (as compared with the lowest lifecycle cost of the solution implemented).
- e) Please see the response to part (d), above.
- f) Avista is required to take the reasonable and prudent steps necessary to ensure we provide an acceptable level of service to our customers. The Attachments to Public Counsel request PC-DR-101 document the need for such investments in order to meet our service obligations, and these actions are reasonable. Because the cost to customers is necessary and reasonable, and because the investment allows us to meet our short and long-term service obligation to our customers, these costs are deemed to be prudent and in the interest of our customers.
- g) Proposed projects for the Substation Capacity Business Case are not discretionary in the long run (i.e. they are not rejected for implementation). As the demand for capital forces a reprioritization of company-wide projects, however, some substation capacity projects may be moved to future years depending on the risks associated with such a move.