

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|  |   |                                   |
|--|---|-----------------------------------|
| WASHINGTON UTILITIES AND<br>TRANSPORTATION COMMISSION, | ) | DOCKETS UE-150204 and             |
|  | ) | UG-150205 ( <i>consolidated</i> ) |
| Complainant,   | ) |                                   |
|  | ) |                                   |
| v.   | ) |                                   |
|  | ) |                                   |
| AVISTA CORPORATION d/b/a                               | ) |                                   |
| AVISTA UTILITIES,                                      | ) |                                   |
|  | ) |                                   |
| Respondent.  | ) |                                   |
| _____  | ) |                                   |

**EXHIBIT BGM-17  
AVISTA RESPONSES TO DATA REQUESTS**

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

|               |                       |                |                            |
|---------------|-----------------------|----------------|----------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/05/2019                 |
| CASE NO:      | UE-150204 & UG-150205 | WITNESS:       | Elizabeth Andrews          |
| REQUESTER:    | Staff-McGuire         | RESPONDER:     | Liz Andrews                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs         |
| REQUEST NO.:  | Staff – 219           | TELEPHONE:     | (509) 495-8601             |
|               |                       | EMAIL:         | liz.andrews@avistacorp.com |

**REQUEST:**

At any point after the Commission entered Order 05, did Avista produce a modified version of Exh. EMA-6, or any other model related to the calculation of attrition revenue requirement or attrition allowance, that incorporated the Commission’s modifications to the attrition methodology as described in Order 05. If yes, please provide all such models that incorporate those Commission-ordered modifications.

**RESPONSE:**

See Staff-DR-219 Attachment A that provides Avista’s modified version incorporating the modifications to the attrition methodology as described by Commission Order 05. Given the Commission approved Staff’s model CRM-2 Revised, Avista made its adjustments per Order 05 to this model.

Based on Commission Order 05, the Company could not replicate an electric attrition study model showing the approved reduction for electric base rates of \$8.1 million. To have reconciled any attrition study would have required access to any models employed by the Commission. As discussed in Commission Order 06, Mr. Kermode explained the derivation of the electric revenue requirement in order conferences held for that purpose. A Commission supplied working attrition model was not provided with the final Orders 05 or 06, and such, the revised model supplied as Staff-DR-219 Attachment A may not include all changes or considerations by the Commission in its determination of its final approved revenue requirement, with its intent to produce a level of revenue or an “end result” that allowed the Company an actual opportunity to earn its allowed ROE (as noted in Order 06).

Avista reserves the right to object to the introduction of any such materials sought to be introduced by any party at time of hearing, based on relevance to the issues at hand. See also Avista’s response to Staff-DR-203 Supplemental and PC-DR-103.

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

|               |                       |                |                          |
|---------------|-----------------------|----------------|--------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/15/2019               |
| CASE NO.:     | UE-150204 & UG-150205 | WITNESS:       | Elizabeth Andrews        |
| REQUESTER:    | AWEC                  | RESPONDER:     | Tara Knox                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs       |
| REQUEST NO.:  | AWEC - 270            | TELEPHONE:     | (509) 495-4325           |
|               |                       | EMAIL:         | tara.knox@avistacorp.com |

**REQUEST:**

Please confirm that customers on electric schedule 25 and gas schedules 132, 146, and 148 did not receive any revenue in 2016 from earnings sharing associated with Avista's decoupling mechanism.

**RESPONSE:**

Correct, these schedules are excluded from the Company's decoupling mechanisms.