

**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-200900 and UG-200901 (*Consolidated*)

**SHAY BAUMAN**

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

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**EXHIBIT SB-8**

Avista Response to Public Counsel Data Request No. 136

**April 21, 2021**

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	02/06/2021
CASE NO.:	UE-200900 & UG-200901	WITNESS:	Josh DiLuciano
REQUESTER:	Public Counsel	RESPONDER:	Dan Burgess/Tamara Bradley
TYPE:	Data Request	DEPT:	Electrical Engineering
REQUEST NO.:	PC - 136	TELEPHONE:	(509) 495-7896
		EMAIL:	Tamara.Bradley@avistacorp.com

**SUBJECT: AMI****REQUEST:**

Please refer to Joshua D. DiLuciano, Exhibit JDD-2, at 57, Table 4-2, which provides the nominal estimated benefits Avista calculated by year in seven areas as of August, 2020.

- a. Provide the detailed calculations of nominal benefits estimated by year for each of the seven areas. Include the calculations in which these nominal benefits are discounted into present value.
- b. Describe any commitments Avista is prepared to make regarding the achievement of the benefits estimated in Table 4-2. If Avista is unwilling to make such commitments, please explain why not.
- c. Describe any annual performance reporting commitments Avista is prepared to make regarding the benefits estimated in Table 4-2. If Avista is unwilling to make any such commitments, please explain why not.

**RESPONSE:**

- a. Please see the Company's response to PC-DR-135 for a description of the calculation of AMI benefits in our 2016 business case, including the nominal and present value for each by year. This description is useful for reviewing the similar calculation of benefits for each area of benefit shown in Exh. JDD-2, which is provided in Avista's AMI Benefits Workbook, PC-DR-136 Attachment A.
- b. Avista believes the financial net benefits to be delivered to our customers by the advanced metering system will continue to increase over time just as we have experienced in the brief period between our initial estimates in 2016 and our current forecast. Avista does not believe that the burden of continuing 'commitment and reporting requirements' will enhance the cost effectiveness of the AMI system for our customers or materially affect the prudence of the Company's decision to deploy. Avista's current business case clearly demonstrates and supports the prudence of this decision.
- c. Please see our response to part (a) above.

Please see Avista's response to PC-DR-143. Avista recently made the decision to read the meters of approximately 17,500 natural gas customers served in our "natural gas only" areas using mobile field collectors instead of the planned deployment of AMI fixed network communications. This decision will have nominal impact on the AMI project lifecycle capital and O&M costs and net financial benefits, as presented in Exh. JDD-2, and the Company is currently revising its business case to reflect this decision.

Avista believes it is in the interest of all parties to have the Company's AMI business case reflect as much actual and updated information as is practical right now, even though we expect only a nominal impact to the overall net benefits. Accordingly, we are updating the project financials, which will be reflected in revised AMI Cost and Benefit Workbooks, to be available in the next two weeks, which will be followed by our revision of the report document itself, Exh. JDD-2. After the AMI Cost and Benefit Workbooks are available, the Company will supplement this response with revised information.