

**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*)

**PAUL J. ALVAREZ AND DENNIS STEPHENS**  
**ON BEHALF OF THE**  
**WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL**  
**PUBLIC COUNSEL UNIT**

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**EXHIBIT PADS-15**

Avista Supplemental Response to Public Counsel Data Request No. 98, Attachment B

**April 21, 2021**

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	02/17/2021
CASE NO.:	UE-200900 & UG-200901	WITNESS:	E. Andrews / H. Rosentrater
REQUESTER:	Public Counsel	RESPONDER:	L. Andrews / K. Schultz
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 098 Supplemental	TELEPHONE:	(509) 495-8601
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**REQUEST:**

**RE: Capital Additions, Test Year (Electric)**

**Please refer to several components of the Direct Testimony of Heather L. Rosentrater, Exhibit HLR-1T:**

- Table No. 2 — Major Projects for 2018 and 2019, at 15;
- Table No. 3 — Pro Forma Capital Additions for 2020 (system), at 51;
- Heather L. Rosentrater, Exhibit HLR-2, Distribution Plan (2021–2024);
- Heather L. Rosentrater, Exhibit HLR-6, Transmission Plan (2021–2024);
- Heather L. Rosentrater, Exhibit HLR-7, Substation Plan (2021–2024).

**Please refer also to the attached MS Excel workbook developed by Public Counsel, “Public Counsel Table 1.xlsx”.**

Public Counsel is developing a trend of historical vs. proposed spending by Plan (Distribution, Transmission, Substation); Business Driver (Customer Request, Mandatory & Compliance, Service Quality & Reliability, etc.); Major Projects; and Sub Projects (for example, within Distribution, “Grid Mod” vs. “wood pole” vs. “electric relocation”). The items referenced above serve as sources for the dollars in years 2018-2024 in Public Counsel Table 1 as indicated.

a) Complete Public Counsel’s table, entering actual dollars added to rate base for years 2015, 2016, and 2017 for the projects, programs, and/or Plan items indicated. Be sure to complete the “Total Dollars” line for each of these years, adding projects (such as “Integrations”) and/or programs as needed to tie to Total Dollars for these years.

b) Complete Column D “Electric Plan Category”, and Column E “Business Driver”, for each line item. Mark any line item which cannot be categorized as an electric Plan (for example, corporate or natural gas line items) with an “NA”. Please also correct any errors in these columns. (Public Counsel has attempted to assign Plans and Drivers in some cases).

**RESPONSE:**

While Avista has generally provided information about its planned levels of capital spending on electric infrastructure for years 2021 and beyond in its various infrastructure plans (Exh. HLR-2, HLR-6, and HLR-7) and applicable business cases provided in Exh. HLR-11 previously filed in this case, Avista objects to this request because it seeks future information that is neither within the scope of this proceeding nor is it reasonably calculated to lead to the discovery of admissible evidence. The information requested pertains to future investments that have not yet been made, that are not subject to a prudence review in this current case, and for which the Company is not seeking any cost recovery at this time. Note the only capital projects included for cost recovery that are in the period of 2021 and beyond, relate to Wildfire costs, Colstrip, EIM and AMI only.

Avista also objects to the request for completion of MS Excel workbook developed by Public Counsel, “Public Counsel Table 1.xlsx” for the period 2015-2017. The Company does not have the information as requested by Public Counsel for the years 2015-2017, this data is outside the scope of this case, and

would be overly broad and unduly burdensome, requiring an unreasonable expenditure of time and effort to produce the requested information as specified.

As noted, Public Counsel has prepared their own excel file with specific data from our filed case for the period 2018-2020, and the period 2021-2024 already provided from Exh. HLR-2, 6 and 7.

However, attached as PC-DR-098 Attachment A, is available data by capital expenditure functional group which provides data that can be viewed for the period 2013 – 2020 (actual) and budgeted through 2025.

Please note, budgeted data by functional group as provided in PC-DR-098 Attachment A or as provided in more detail in Exh.HLR-2, 6 and 7 is as of a point in time and is subject to change. Additional information on each Distribution, Transmission and Substation capital addition can be found in individual business cases for each project in Rosentrater Exh. HLR-11.

### **SUPPLEMENTAL 02/17/2021**

Please see PC-DR-098 Supplemental Attachment B for a detail listing of projects by business case and business driver that have transferred to plant for the period 2015 – 2019. This data includes all projects specific to witness Ms. Rosentrater. See also Exh. HLR-10 for descriptions of 2018-2019 capital additions, as well as HLR-11 for the individual business cases. Additional information as noted above can be found in Exh.HLR-2, 6 and 7, including forward balances, however, amounts noted for all forward balances in the infrastructure plans represent spend versus transfer-to-plant for historical information provided in Attachment B.

Please note, amounts included in PC-DR-098 Supplemental Attachment B (consistent with Rosentrater testimony) are system transfer-to-plant balances, including not only direct or allocated to Washington electric or natural gas, but also include balances for Idaho and Oregon.

Please also note, in 2017 the Company revised its Business Cases to reflect the adoption of “Investment Drivers” used today as described by Mr. Thies in his direct testimony. The value of using these investment driver categories is to help focus the understanding of what factors are driving our need to invest capital on behalf of our customers. However, due to this change, prior to 2017 there may be some inconsistencies year to year between Business Case balances when trying to compare annual balances between the period 2015 – 2019 included in PC-DR-098 Supplemental Attachment B. In addition, certain projects fall in a category labeled “No Driver”, mainly prior to 2017, which do not fit the “Investment Driver” categories used today.

Witness/Primary Investment Driver/Business Case	System Transfers to Plant by Year					Grand Total
	2015	2016	2017	2018	2019	
<b>Rosenrater - Electric</b>	<b>146,831,095</b>	<b>128,301,529</b>	<b>159,962,463</b>	<b>142,293,804</b>	<b>153,939,124</b>	<b>731,328,015</b>
<b>Asset Condition</b>	<b>64,526,983</b>	<b>58,690,312</b>	<b>83,465,648</b>	<b>68,605,038</b>	<b>59,224,025</b>	<b>334,512,006</b>
Distribution Grid Modernization	13,659,096	9,628,790	18,090,992	14,788,545	10,112,822	66,280,245
Distribution Minor Rebuild	11,731,375	9,911,356	13,752,649	9,272,548	11,868,906	56,536,834
Distribution Transformer Change Out Program	3,052,669	2,951,896	3,773,562	2,064,151	995,659	12,837,938
Downtown Network - Asset Condition	-	-	-	2,742,350	1,815,954	4,558,303
LED Change-Out Program	2,548,663	3,466,526	2,265,528	1,367,942	676,578	10,325,237
Primary URD Cable Replacement	897,230	778,313	608,762	637,472	813,805	3,735,582
SCADA - SOO and BuCC	580,196	435,620	759,529	528,722	508,435	2,812,502
Substation - Station Rebuilds Program	6,201,471	10,035,754	13,666,950	17,856,512	17,773,790	65,534,476
Transmission - Minor Rebuild	3,274,598	5,175,166	4,556,793	586,929	3,971,001	17,564,488
Transmission Major Rebuild - Asset Condition	14,217,717	8,406,054	16,406,498	7,760,684	314,005	47,104,958
Wood Pole Management	8,363,968	7,900,836	9,584,384	10,999,184	10,373,071	47,221,443
<b>Customer Requested</b>	<b>28,645,814</b>	<b>25,145,623</b>	<b>38,365,848</b>	<b>40,672,834</b>	<b>47,652,745</b>	<b>180,482,862</b>
Lind Solar Project #53 Interconnection	-	-	-	1,335,341	16,907	1,352,248
New Revenue - Growth	28,645,814	25,145,623	38,365,848	39,337,493	38,168,322	169,663,099
Rattlesnake Flat Wind Farm Project 115kV Integration Project	-	-	-	-	9,467,516	9,467,516
<b>Failed Plant &amp; Operations</b>	<b>27,627,200</b>	<b>6,242,579</b>	<b>7,122,546</b>	<b>3,448,182</b>	<b>6,435,735</b>	<b>50,876,241</b>
Electric Storm	27,331,169	6,034,215	6,813,471	3,190,440	6,237,565	49,606,861
Meter Minor Blanket	296,031	208,363	309,075	257,742	198,169	1,269,381
<b>Mandatory &amp; Compliance</b>	<b>11,726,793</b>	<b>25,214,191</b>	<b>22,267,371</b>	<b>24,768,191</b>	<b>31,635,115</b>	<b>115,611,662</b>
Colstrip Transmission	390,246	274,416	440,528	120,892	357,673	1,583,754
Elec Relocation and Replacement Program	2,130,635	3,287,381	3,493,640	1,573,450	1,693,571	12,178,677
Ninth & Central 230kV Station & Transmission	-	-	-	-	273,542	273,542
Noxon Switchyard 230kV Breaker Replacement	632,701	15,168,872	8,549	(592,370)	2,576,358	17,794,110
Protection System Upgrade for PRC-002	-	-	-	-	1,165,241	1,165,241
S Region Voltage Control	-	-	-	-	7,802,071	7,802,071
Saddle Mountain 230/115kV Station (New) Integration Project Phase 1	-	-	-	2,554,495	8,943,952	11,498,447
Spokane Valley Transmission Reinforcement Project	4,383,669	626,462	3,460,909	-	(110)	8,470,930
Transmission - NERC High Priority Mitigation	29,289	-	343,466	-	-	372,755
Transmission Construction - Compliance	146	2,560,316	11,498,226	10,845,388	5,883,218	30,787,294
Transmission NERC Low-Risk Priority Lines Mitigation	-	-	1,550,962	774,519	744,660	3,070,142
Transmission NERC Medium-Risk Priority Lines Mitigation	3,395,392	(261)	1,289,018	(155,480)	-	4,528,669
Tribal Permits & Settlements	756,234	3,245,234	125,763	87,307	1,251,484	5,466,021
West Plains New 230kV Substation	-	-	56,311	-	292,596	348,907
Westside 230/115kV Station Brownfield Rebuild Project	8,482	51,770	-	9,559,989	650,861	10,271,103
<b>No Driver</b>	<b>1,394,353</b>	<b>(50)</b>	<b>-</b>	<b>(6,447)</b>	<b>-</b>	<b>1,387,856</b>
Clearwater Sub Upgrades	85,695	-	-	(802)	-	84,893
Moscow 230 Sustation Rebuild	738,866	(461)	-	-	-	738,406
Smart Grid Demonstration Project	(50,705)	411	-	-	-	(50,294)
Spokane Smart Circuit	19,657	-	-	(5,645)	-	14,012
Transmission - Reconductors and Rebuilds	600,839	-	-	-	-	600,839
<b>Performance &amp; Capacity</b>	<b>12,909,952</b>	<b>13,008,874</b>	<b>8,741,049</b>	<b>4,806,007</b>	<b>8,991,504</b>	<b>48,457,387</b>
Downtown Network - Performance & Capacity	1,918,652	1,279,491	1,528,548	340,338	379,678	5,446,708
Harrington Upgrades	707,487	2,831,632	45,257	143,563	(10,497)	3,717,442
Segment Reconductor and FDR Tie	4,902,622	5,544,026	4,702,896	3,685,446	4,853,883	23,688,874
Substation - New Distribution Station Capacity Program	5,381,190	3,353,725	2,464,347	636,660	3,768,440	15,604,363
<b>Rosenrater - General Plant and Other Plant</b>	<b>42,626,968</b>	<b>29,904,708</b>	<b>34,389,632</b>	<b>69,905,010</b>	<b>48,155,862</b>	<b>224,982,179</b>
<b>Asset Condition</b>	<b>16,841,043</b>	<b>15,649,732</b>	<b>16,882,439</b>	<b>32,929,203</b>	<b>24,906,893</b>	<b>107,209,309</b>
Capital Tools & Stores	3,330,139	2,690,391	3,993,463	2,717,260	1,771,563	14,502,816
Fleet Services Capital Plan	8,129,277	8,873,249	6,624,194	8,560,627	6,662,890	38,850,236
New Deer Park Service Center	267,181	-	-	-	6,270,744	6,537,926
New Dollar Road Service Center	1,649	-	3,195,906	17,195,902	7,038,810	27,432,267
Noxon & Clark Fork Living Facilities	-	-	2,036,182	524,385	1,604,558	4,165,124
Structures and Improvements/Furniture	5,112,797	4,086,092	1,032,694	3,931,029	1,558,328	15,720,939
<b>Mandatory &amp; Compliance</b>	<b>118,055</b>	<b>52,855</b>	<b>-</b>	<b>136,695</b>	<b>1,890</b>	<b>309,496</b>
Apprentice/Craft Training	118,055	52,855	-	136,695	1,890	309,496
<b>No Driver</b>	<b>15,982,557</b>	<b>1,462,795</b>	<b>7,271,829</b>	<b>8,230,730</b>	<b>4,368,254</b>	<b>37,316,165</b>
CNG Fleet Conversion	176,916	12,175	76,260	75,174	-	340,525
Community Solar - Boulder Park	944,895	(645,540)	-	147	-	299,502
HVAC Renovation Project	9,614,320	9,814	-	-	-	9,624,134
Post Street Annex	-	639,884	-	-	-	639,884
Productivity	2,843,023	799,346	5,507,543	7,098,685	3,592,802	19,841,399
Strategic Initiatives	2,403,403	647,116	1,688,026	1,056,725	775,452	6,570,722
<b>Performance &amp; Capacity</b>	<b>9,685,313</b>	<b>12,739,327</b>	<b>10,235,364</b>	<b>28,608,382</b>	<b>18,878,824</b>	<b>80,147,210</b>
Airport Hangar	-	-	-	1,951,555	288,331	2,239,887
Campus Repurposing Phase 1	3,923,577	7,285,417	3,065,078	-	-	14,274,072
Campus Repurposing Phase 2	2,578,112	386,961	4,557,762	12,304,512	16,130,430	35,957,777
Company Aircraft Capital	-	-	369,038	3,082,768	-	3,451,806
Downtown Campus	2,064,761	4,120,082	(2)	7,893,920	22,210	14,100,971
Ergonomic Equipment	-	-	589,902	1,024,405	(51,203)	1,563,104
Jackson Prairie Joint Project	1,118,862	946,867	1,653,586	2,351,222	2,489,056	8,559,593
<b>Rosenrater - Natural Gas</b>	<b>71,760,692</b>	<b>70,215,587</b>	<b>91,596,006</b>	<b>92,924,102</b>	<b>83,153,547</b>	<b>409,649,933</b>
<b>Asset Condition</b>	<b>1,205,311</b>	<b>1,594,246</b>	<b>2,045,985</b>	<b>3,031,202</b>	<b>1,844,929</b>	<b>9,721,673</b>
Gas Deteriorated Steel Pipe Replacement Program	448,174	617,986	729,804	1,784,165	623,104	4,203,233
Gas ERT Replacement Program	84,416	140,284	200,875	179,682	225,328	830,585
Gas Regulator Station Replacement Program	672,721	835,976	1,115,307	1,067,355	996,497	4,687,855
<b>Customer Requested</b>	<b>22,019,791</b>	<b>24,523,800</b>	<b>38,343,919</b>	<b>41,749,563</b>	<b>33,420,851</b>	<b>160,057,924</b>
New Revenue - Growth	22,019,791	24,523,800	38,343,919	41,749,563	33,420,851	160,057,924
<b>Failed Plant &amp; Operations</b>	<b>9,728,818</b>	<b>7,105,144</b>	<b>9,670,341</b>	<b>8,811,389</b>	<b>8,173,893</b>	<b>43,489,585</b>
Gas Non-Revenue Program	9,728,818	7,105,144	9,670,341	8,811,389	8,173,893	43,489,585

Witness/Primary Investment Driver/Business Case	System Transfers to Plant by Year					Grand Total
	2015	2016	2017	2018	2019	
<b>Mandatory &amp; Compliance</b>	<b>26,559,888</b>	<b>27,500,350</b>	<b>32,111,831</b>	<b>34,205,152</b>	<b>35,446,876</b>	<b>155,824,096</b>
Gas Cathodic Protection Program	1,210,961	1,201,411	1,101,801	311,249	784,320	4,609,742
Gas Facility Replacement Program (GFRP) Aldyl A Pipe Replacement	19,709,181	19,576,293	18,371,496	21,914,044	22,002,672	101,573,687
Gas HP Pipeline Remediation Program	-	475,694	5,416,624	4,952	-	5,897,270
Gas Isolated Steel Replacement Program	1,278,547	1,008,927	1,570,633	1,416,008	1,459,659	6,733,773
Gas N-S Corridor Greene St HP Main Project	-	-	-	2,905,791	-	2,905,791
Gas Overbuilt Pipe Replacement Program	478,597	271,180	501,419	85,263	755,731	2,092,191
Gas PMC Program	1,175,294	1,403,439	2,193,827	2,863,796	2,852,374	10,488,731
Gas Replacement Street and Highway Program	2,707,307	3,563,407	2,956,031	4,704,048	7,592,120	21,522,912
<b>No Driver</b>	<b>10,819,780</b>	<b>7,367,277</b>	<b>2,637,394</b>	<b>47,312</b>	-	<b>20,871,764</b>
Gas Bonanza Gate Stn Project	633,967	7,920	-	-	-	641,888
Gas Chase Rd Gate Stn and HP Main Project	5,913,086	714	-	-	-	5,913,800
Gas East Medford HP Main Reinforcement Project	-	5,630,681	2,220	-	-	5,632,901
Gas Goldendale HP Main Reinforcement Project	2,849,161	121,382	1,375	-	-	2,971,918
Gas Ladd Canyon Gate Station	1,423,413	47,778	-	-	-	1,471,191
Gas N Spokane Hwy 2 HP Main Reinforcement Project	-	-	2,633,799	42,168	-	2,675,967
Gas Oakland Bridge HP Main Gas Project	153	-	-	-	-	153
Gas Spokane St Bridge IP Main Project	-	1,558,801	-	-	-	1,558,801
Old Hwy 95 Relocation	-	-	-	5,144	-	5,144
<b>Performance &amp; Capacity</b>	<b>1,427,104</b>	<b>2,124,770</b>	<b>6,786,536</b>	<b>5,079,484</b>	<b>4,266,997</b>	<b>19,684,891</b>
Gas Cheney HP Reinforcement	-	-	-	-	3,048,353	3,048,353
Gas Operator Qualification Compliance	-	-	-	-	248,710	248,710
Gas Pierce Rd La Grande HP Reinforcement	-	-	2,080,771	(25,555)	-	2,055,215
Gas Rathdrum Prairie HP Main Reinforcement	-	-	3,366,180	3,122,112	14,951	6,503,243
Gas Reinforcement Program	1,314,945	1,791,702	1,192,295	1,767,984	795,172	6,862,098
Gas Telemetry Program	112,159	333,068	147,291	214,943	159,810	967,271
<b>Rosentrater - Electric &amp; Natural Gas</b>	-	-	<b>33,987,445</b>	<b>33,868,858</b>	<b>52,793,010</b>	<b>120,649,313</b>
<b>Customer Service Quality &amp; Reliability</b>	-	-	<b>33,987,445</b>	<b>33,868,858</b>	<b>52,793,010</b>	<b>120,649,313</b>
Washington Advanced Metering Infrastructure Project	-	-	33,987,445	33,868,858	52,793,010	120,649,313
<b>Grand Total</b>	<b>261,218,755</b>	<b>228,421,824</b>	<b>319,935,545</b>	<b>338,991,774</b>	<b>338,041,542</b>	<b>1,486,609,440</b>