

**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-25**

Avista Response to Public Counsel Data Request No. 107

**April 21, 2021**

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	02/06/2021
CASE NO.:	UE-200900 & UG-200901	WITNESS:	Heather Rosentrater
REQUESTER:	Public Counsel	RESPONDER:	Heather Webster
TYPE:	Data Request	DEPT:	Asset Maintenance
REQUEST NO.:	PC - 107	TELEPHONE:	(509) 495-8930
		EMAIL:	heather.webster@avistacorp.com

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

**REQUEST:**

Please refer to Heather L. Rosentrater, Exhibit HLR-11, at 2, regarding the Distribution Grid Modernization program, which cites the following among the benefits of the program: “Automation devices produce results immediately optimizing system performance, reducing costs, and reducing outages” and “Cost effective work due to program efficiencies and long-term planning”.

- a. Provide the number of headcount reductions, by department (distribution field crews, engineering, etc.), Avista was able to execute as a result of the Program in 2018, 2019, and 2020.
- b. Quantify the O&M savings which resulted from these headcount reductions by year.

**RESPONSE:**

- a) Avista’s staffing for the various activities listed is a function of the amalgam of many different business needs, which naturally vary over time. While the subject program does produce efficiencies and financial savings as noted in the business case, it is not possible to tease out one function such as Grid Modernization and to tie that to staffing levels, which are the result of so many different business needs and factors. In addition to this, the annual variability in feeder reliability performance, as noted in Avista’s response to PC-DR-111, adds to this overall variability in resource demands. Accordingly, the Company has not attempted to forecast what employment levels would look like in a scenario where it would be assumed that no Grid Modernization investments had been made.
- b) Please see the response to part (a), above.