

**Exh. DCG-18T  
Dockets UE-190334, UG-190335  
and UE-190222 (*consolidated*)  
Witness: David C. Gomez**

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,**

**Complainant,**

**v.**

**AVISTA CORPORATION, d/b/a  
AVISTA UTILITIES,**

**Respondent.**

**DOCKETS UE-190334, UG-190335  
and UE-190222 (*Consolidated*)**

**RESPONSE TESTIMONY OF**

**David C. Gomez**

**STAFF OF  
WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

***2018 Power Costs in Docket UE-190222***

**October 28, 2019**

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1 **I. INTRODUCTION**

2

3 **Q. Please state your name and business address.**

4 A. My name is David C. Gomez. My business address is 621 Woodland Square Loop  
5 SE, Lacey, Washington 98503. My business email address is  
6 david.gomez@utc.wa.gov.

7

8 **Q. By whom are you employed and in what capacity?**

9 A. I am employed by the Washington Utilities and Transportation Commission  
10 (“Commission”) as the Assistant Power Supply Manager in the Energy Section of  
11 the Regulatory Services Division.

12

13 **Q. Are you the same David C. Gomez who filed responsive testimony on behalf of**  
14 **Commission Staff (Staff) on October 3, 2019 in these consolidated dockets?**

15 A. Yes.

16

17 **II. DISCUSSION**

18

19 **Q. What is the scope of your testimony in this phase of the proceeding?**

20 A. On October 24, 2019, the Commission entered Order 06 in Dockets UE-190334,  
21 UG-190335, and UE-190222 (consolidated), denying Staff’s motion to sever  
22 Avista’s annual Energy Recovery Mechanism (ERM) filing (UE-190222) from the  
23 general rate case (UE-190334 and UG-190335) and consolidate the ERM with the

1 annual power cost filings of both PSE and PacifiCorp for the purpose of reviewing  
2 the prudence of the 2018 Colstrip outage. Instead, the Commission directed Staff to  
3 initiate an investigation under Docket UE-190882, limited in scope to Avista's,  
4 PSE's, and PacifiCorp's decision making as co-owners of Colstrip leading up to the  
5 2018 outage and the resulting costs of replacement power. Additionally, the  
6 Commission directed the parties to the general rate case (GRC) to file testimony and  
7 exhibits with respect to issues in Docket UE-190222 that are *unrelated* to the 2018  
8 Colstrip outage and the costs incurred to acquire replacement power due to that  
9 outage.

10  
11 **Q. Are you offering any testimony on topics unrelated to the 2018 Colstrip outage?**

12 A. No. Staff examined the entire filing and only has unresolved concerns surrounding  
13 the prudence of the replacement power costs associated with the 2018 Colstrip  
14 outage. As a result, Staff is not offering responsive testimony at this time as to non-  
15 outage related costs. However, discovery is ongoing in the GRC and will commence  
16 very soon in Docket UE-190882. As such, Staff reserves the right to file a motion(s)  
17 requesting to file additional testimony to address any *new* information or issues  
18 which emerge as a result of discovery in both the consolidated rate case and new  
19 investigation (Docket UE-190882). Staff would like to reserve this right because it  
20 has only just begun to receive documents responsive to its public records request  
21 from the State of Montana's Department of Environmental Quality, which pertain to  
22 the 2018 Colstrip outage.

1 **Q. Are you challenging Avista's calculation of its outage replacement power costs?**

2 A. No. In Mr. William G. Johnson's prefiled direct testimony in Docket UE-190222, he  
3 estimated that the 2018 Colstrip outage resulted in \$3.5 million in replacement power  
4 costs. Staff reviewed Mr. Johnson's workpapers and is satisfied that this amount  
5 accurately quantifies the impact of the 77-day outage.

6

7 **Q. Does this conclude your testimony?**

8 A. Yes.