

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-21_____

ATTORNEY'S CLAIM OF CONFIDENTIALITY
RELATING TO INFORMATION PROVIDED AS PART
OF AVISTA'S ANNUAL FILING TO REVIEW ERM DEFERRALS

DAVID J. MEYER

VICE PRESIDENT and CHIEF COUNSEL FOR
REGULATORY AND GOVERNMENTAL AFFAIRS

REPRESENTING AVISTA CORPORATION

1 I, David J. Meyer, represent Avista Corporation. I am Vice President and Chief Counsel
2 for Regulatory and Governmental Affairs for Avista Corporation (“Avista” or “Company”) and
3 I am appearing on its behalf in this proceeding.

4 I make this claim of confidentiality pursuant to WAC 480-07-160 (4)(a) because Avista,
5 through its Direct Testimony, Exhibits and supporting workpapers, is disclosing certain
6 information that is CONFIDENTIAL and constitutes VALUABLE COMMERCIAL
7 INFORMATION as defined by WAC 480-07-160 (2) and protected under WAC 480-07-160
8 and RCW 80-04-095.

9 Any printed information Avista provides will, as required under WAC 480-07-160 and
10 WAC 480-07-420, be marked as CONFIDENTIAL, submitted on yellow or canary paper, and
11 will be provided under separate cover. The electronic information Avista provides will be
12 reproduced separately on an electronic format and will also be marked as CONFIDENTIAL.

13 The confidential information that Avista is disclosing can be classified into four basic
14 categories: 1) information pertaining to contract prices, terms and conditions, 2) certain results
15 providing detailed information on the Company's load and resource positions by month, 3) Risk
16 Management Policies which contain general policies, guidelines, and position limits, and 4) plant
17 operational data related to the Colstrip plant.

18 Avista herein asserts that the aforementioned information is confidential in that: 1) the
19 contract information is prohibited, by the contract terms, from public disclosure, 2) making the
20 load and resource information public will give entities access to competitive information on
21 future operating plans and market purchase requirements and Avista believes the information
22 could be used to disadvantage its customers, 3) the Risk Management Policies, if shared with

1 competitors, could also be used to disadvantage Avista's customers, and 4) the operational data
2 on Colstrip comprises valuable commercial information.

3 I am of the opinion, therefore, that this information is “CONFIDENTIAL,” as defined by
4 WAC 480-07-160, and should be protected from public inspection, examination and copying,
5 and should be utilized only in accordance with the terms of the Protective Order, in Docket No.
6 UE-011595.

7 RESPECTFULLY SUBMITTED this 31st day of March 2021

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/s/ David J. Meyer

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David J. Meyer
Vice President and Chief Counsel for
Regulatory and Governmental Affairs
Avista Corporation

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