

Exh. DCG-23
Dockets UE-190529/UG-190530 and
UE-190274/UG-190275 (*consolidated*)
Witness: David C. Gomez

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

PUGET SOUND ENERGY,

Respondent.

**DOCKETS UE-190529
and UG-190530 (*consolidated*)**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For an Order Authorizing Deferral
Accounting and Ratemaking Treatment
for Short-life UT/Technology Investment**

**DOCKETS UE-190274 and
UG-190275 (*consolidated*)**

EXHIBIT TO TESTIMONY OF

David C. Gomez

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Avista GRC, Docket No. UE-190334; Response Testimony of Avi Allison

November 22, 2019

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a AVISTA UTILITIES

Respondent.

DOCKET NOS. UE-190334 and UG-190335, UE-190222 (*Consolidated*)

**RESPONSE TESTIMONY OF AVI ALLISON
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT AA-1T

October 28, 2019

DOCKET NOS. UE-190334 and UG-190335, UE-190222 (*Consolidated*)

RESPONSE TESTIMONY OF AVI ALLISON

EXHIBIT AA-1T

TABLE OF CONTENTS

I.	INTRODUCTION AND SUMMARY	1
II.	SETTING OF AUTHORIZED NET POWER COSTS	3
A.	Avista’s Actual Net Power Costs Have Consistently Been Lower Than Authorized Net Power Costs In Recent Years	5
B.	Avista’s Treatment of Natural Gas Transport Optimization Revenues Demonstrates the Upward Bias in Avista’s Setting of 2018 Authorized Net Power Costs.....	7
III.	CONCLUSIONS AND RECOMMENDATIONS	12

DOCKET NOS. UE-190334 and UG-190335, UE-190222 (*Consolidated*)

RESPONSE TESTIMONY OF AVI ALLISON

EXHIBIT AA-1T

EXHIBITS LIST

Exhibit AA-2	Resume of Avi Allison
Exhibit AA-3	Attachment A to Avista Response to Public Counsel Data Request No. 106
Exhibit AA-4	Avista Response to Public Counsel Data Request No. 117(d)
Exhibit AA-5	Supplemental Attachment B to Avista Response to Public Counsel Data Request No. 107
Exhibit AA-6	Avista Supplemental Response to Public Counsel Data Request No. 107
Exhibit AA-7	Supplemental Attachment C to Avista Response to Public Counsel Data Request No. 107

I. INTRODUCTION AND SUMMARY

1 **Q. Please state your name and occupation.**

2 A. My name is Avi Allison and I am a Senior Associate with Synapse Energy Economics,
3 Incorporated (“Synapse”). My business address is 485 Massachusetts Avenue, Suite 2,
4 Cambridge, Massachusetts 02139.

5 **Q. Please describe Synapse Energy Economics.**

6 A. Synapse is a research and consulting firm specializing in energy and environmental
7 issues, including electric generation, transmission and distribution system reliability,
8 ratemaking and rate design, electric industry restructuring and market power, electricity
9 market prices, stranded costs, efficiency, renewable energy, environmental quality, and
10 nuclear power.

11 Synapse’s clients include state consumer advocates, public utilities commission
12 staff, attorneys general, environmental organizations, federal government agencies, and
13 utilities.

14 **Q. Please summarize your work experience and educational background.**

15 A. At Synapse, I provide consulting and research services on a wide range of issues related
16 to the electric industry. My areas of focus include resource planning, power plant
17 economics, rate design, economic impact analysis, and regional capacity markets. I have
18 provided consulting services for a variety of public sector and public interest clients
19 including the U.S. Environmental Protection Agency, the Michigan Public Service
20 Commission, the Michigan Agency for Energy, the New York State Energy Research and
21 Development Authority, the Rhode Island Office of Energy Resources, the Efficiency
22 Maine Trust, the Maine Office of the Public Advocate, the California Department of

1 Justice, the Washington State Office of the Attorney General, Consumers Union, Sierra
2 Club, Natural Resources Defense Council, and other organizations.

3 I have provided testimony in resource planning, power cost, and rate case dockets
4 in Michigan, Indiana, and Arkansas.

5 I hold a Master of Environmental Management from Yale University and a
6 Bachelor of Arts in economics from Columbia University. A copy of my current resume
7 is attached as Exhibit AA-2.¹

8 **Q. On whose behalf are you testifying in this case?**

9 A. I am testifying on behalf of the Public Counsel Unit of the Washington Attorney
10 General's Office ("Public Counsel").

11 **Q. What is the purpose of your testimony in this proceeding?**

12 A. The purpose of my testimony is to review the Energy Recovery Mechanism (ERM)
13 filings of Avista Corporation ("Avista" or "the Company"). Specifically, I focus on the
14 reasonableness of Avista's process for calculating pro forma net power supply expenses.

15 **Q. Please identify the documents and filings on which you base the opinions presented
16 in your testimony.**

17 A. My findings rely primarily upon the testimony, workpapers, and discovery responses of
18 Avista witness William G. Johnson.

¹ Avi Allison, Exh. AA-2 (Resume of Avi Allison).

1 **Q. Please summarize your findings.**

2 A. My primary finding is that Avista’s biased calculations of 2018 pro forma net power
3 costs resulted in unreasonably high authorized net power costs. Avista broke from its
4 standard reliance on forward gas prices in deliberately and subjectively revising
5 downward its projection of future gas transport optimization revenues. This resulted in
6 unreasonably high authorized net power costs and unreasonably high customer rates. This
7 instance of bias helps to explain the overall directional bias in Avista’s power cost
8 modeling that the Commission previously identified in Avista’s 2017 general rate case.

9 **Q. Do you have any recommendations for the Commission?**

10 A. Yes. I recommend that the Commission re-affirm its position that Avista’s net power cost
11 calculations are directionally biased. Because the ongoing stakeholder process to improve
12 Avista’s net power cost calculations has been productive, the Commission should
13 continue to support that process. The Commission should further require Avista to correct
14 identified errors and biases in its net power cost calculations no later than its next rate
15 case.

II. SETTING OF AUTHORIZED NET POWER COSTS

16 **Q. Please summarize Avista’s ERM.**

17 A. Under Avista’s ERM, the Company undergoes a modeling exercise to calculate pro
18 forma net power costs that are used to set the “authorized” baseline level of net power
19 costs to be recovered through rates. The Company then tracks the difference between
20 those authorized net power costs and the net power costs that are actually incurred. Each
21 year, the first \$4 million of net power supply costs above or below the authorized level is
22 absorbed entirely by the Company. When actual costs are less than authorized costs, 25

1 percent of the next \$6 million differential is absorbed by the Company and 75 percent is
2 deferred for rebate to customers. If the differential between authorized and actual net
3 power costs exceeds \$10 million, 10 percent of the amount above \$10 million is absorbed
4 by the Company and 90 percent is deferred for allocation to customers.² Avista's
5 authorized baseline was last set in Avista's 2017 general rate case and Avista does not
6 seek to reset baseline in this case.

7 **Q. How does Avista calculate pro forma net power costs?**

8 A. Avista calculates pro forma net power costs through a combination of electric dispatch
9 modeling and out-of-model calculations that reflect physical and financial natural gas
10 contracts. Notably, both Avista's calculation of pro forma net power costs and the
11 Company's tracking of actual net power costs account for Avista revenues associated
12 with the Company's use of its firm natural gas transportation contracts for price arbitrage
13 purposes.³ These revenues help to offset power costs, driving net power costs down. For
14 2018, authorized net power costs were primarily grounded in calculations presented by
15 Avista in its 2017 general rate case.

² Direct Testimony of William G. Johnson, Exh. WGJ-1T at 7.

³ *Id.* at 8-9.

**A. Avista’s Actual Net Power Costs Have Consistently Been Lower than
Authorized Net Power Costs in Recent Years**

1 **Q. How have Avista’s authorized net power costs compared to actual net power costs in**
2 **recent years?**

3 A. In recent years, Avista’s authorized net power costs have consistently been substantially
4 higher than actual incurred net power costs. Actual net power costs have been at least \$6
5 million less than authorized levels in each of the past five years and in seven of the past
6 eight years.⁴ Over the period from 2014 through 2018, cumulative actual net power costs
7 were \$57 million below authorized levels.⁵ Under the ERM framework, Avista has
8 retained \$27 million of that differential.⁶

9 **Q. Is it a good thing that Avista’s actual net power costs have consistently been lower**
10 **than authorized levels?**

11 A. It is certainly a positive development when Avista efficiently manages its system in a
12 way that reduces net power costs. And the tendency of Avista to incur actual net power
13 costs that are lower than authorized levels may reflect efficient, prudent system
14 operations to some degree. However, the frequency and magnitude of Avista’s actual
15 power cost savings relative to authorized costs raises the concern that Avista’s modeling
16 of authorized net power costs is systematically biased, as argued by Public Counsel and
17 Commission Staff in Avista’s 2017 general rate case.

⁴ Allison, Exh. AA-3 (Attachment A to Avista Response to Public Counsel Data Request No. 106, Column D).

⁵ *Id.* (sum of Cells D16:D20).

⁶ *Id.* (sum of Cells I16:I20).

1 **Q. Did the Commission evaluate the presence of bias in Avista’s power cost modeling in**
2 **Avista’s 2017 general rate case?**

3 A. Yes. In its final order in Avista’s 2017 rate case, the Commission noted that “Avista’s
4 power cost forecasts have been consistently unbalanced in the Company’s favor over
5 recent years” and recognized the results of Avista’s power cost modeling as
6 “directionally biased.”⁷ The Commission went on to order Avista to engage Commission
7 Staff, Public Counsel, and other interested parties in a discussion about how Avista’s
8 power cost modeling could be simplified and improved.⁸

9 **Q. Has Avista engaged Commission Staff, Public Counsel, and other interested parties**
10 **in a discussion of how to improve Avista’s power cost modeling?**

11 A. Yes. Avista, Staff, Public Counsel, and the Alliance of Western Energy Consumers have
12 engaged in a series of power cost workshops to discuss potential improvements to
13 Avista’s power cost modeling. The goal of this process is to arrive at consensus
14 adjustments that will improve Avista’s power cost modeling. Avista has conducted
15 modeling at the stakeholders’ request, and stakeholders are in the process of engaging a
16 third-party consultant to review Avista’s modeling approach. This power cost workshop
17 process is ongoing and appears to be headed in a useful direction. However, Avista’s
18 2018 net power cost calculations exhibit the same upward bias as in previous years, as I
19 discuss in this section of my testimony.

⁷ *WUTC v. Avista Corp.*, Dockets UE-170485 and UE-170486, Order 07: Final Order at 53-54 (Apr. 26, 2018).

⁸ *Id.* at 55.

**B. Avista’s Treatment of Natural Gas Transport Optimization Revenues
Demonstrates the Upward Bias in Avista’s Setting of 2018 Authorized Net
Power Costs.**

1 **Q. How did Avista’s actual net power costs compare to authorized net power costs in**
2 **2018?**

3 A. In 2018, actual net power costs were \$15.5 million lower than authorized levels. Avista
4 retained \$6 million of this differential.⁹ Thus, 2018 continued the trend of actual net
5 power costs coming in substantially lower than authorized levels.

6 **Q. What was the primary source of the differential between Avista’s actual and**
7 **authorized net power costs in 2018?**

8 A. In 2018, discrepancies between actual and projected natural gas transport optimization
9 revenues were the greatest source of differences between actual and projected net power
10 costs. Mr. Johnson’s testimony identifies the “Change in Gas Generation and Natural Gas
11 Prices” category as accounting for \$14.6 million of the total \$15.5 million differential
12 between authorized and actual costs.¹⁰ Mr. Johnson describes this category’s differential
13 as “primarily driven by lower AECO gas prices and the large increase in the price spread
14 between the AECO and Malin trading points.”¹¹

⁹ Johnson, Exh. WGJ-1T at 2.

¹⁰ Johnson, Exh. WGJ-1T at 14.

¹¹ *Id.*

1 **Q. Why does a larger spread between the AECO and Malin natural gas trading hubs**
2 **result in lower Avista net power costs?**

3 A. A larger spread between the AECO and Malin trading hubs decreases Avista's net power
4 costs because the Company's firm natural gas transportation contracts enable it to
5 purchase low-cost gas at AECO and sell that gas at the higher-priced Malin hub.¹² This
6 gas transport optimization enables Avista to generate revenues that help to offset power
7 costs.

8 **Q. Did Avista's calculation of 2018 pro forma net power costs contain a reasonable**
9 **projection of the impact of gas transport optimization revenues?**

10 A. No. Avista's calculations of 2018 pro forma gas transport optimization revenues were
11 biased in a way that predictably contributed to actual 2018 net power costs being lower
12 than authorized levels. Although Avista did account for this category of revenues in its
13 calculation of 2018 authorized net power costs, it did so in a way that was inconsistent
14 with market evidence and the Company's own standard process for forecasting
15 commodity prices.

16 **Q. In general, how does Avista set commodity price assumptions for the purposes of its**
17 **pro forma net power cost calculations?**

18 A. Generally, Avista relies heavily on forward market prices to determine its commodity
19 price assumptions for its pro forma net power cost modeling. Avista used market
20 forwards to set natural gas price input assumptions for the power cost modeling

¹² *Id.* at 9.

1 underlying its 2018 authorized net power costs.¹³ Avista even adjusted a variety of inputs
2 in the AURORA_{XMP} electric dispatch model in an effort to get the energy price output
3 from that model to align with forward prices.

4 **Q. How did Avista forecast natural gas prices for the purpose of its 2018 pro forma gas**
5 **transport optimization revenue calculations?**

6 A. For the purposes of its calculations of pro forma gas transport optimization revenues,
7 Avista broke from its standard reliance on forward prices. Avista estimated that forward
8 pricing at the time of its 2018 pro forma power cost analyses indicated gas transport
9 optimization revenues of \$13.8 million for calendar year 2018 and \$13.3 million for the
10 2017 rate case pro forma period lasting from May 2018 through April 2019.¹⁴ However,
11 rather than using its own forwards-based revenue projections, Avista “tempered” its
12 projections using “historic average” estimates.¹⁵ “Based on forward prices, history, and
13 price uncertainty,” Avista decided to include a gas transport optimization value of \$9
14 million for the pro forma period.¹⁶ In other words, for the May 2018 through April 2019
15 pro forma period, Avista decided to decrease projected gas transport optimization
16 revenues (and therefore increase projected net power costs) by more than \$4 million from
17 its own forwards-based projection.

¹³ Allison, Exh. AA-4 (Avista Response to Public Counsel Data Request No. 117(d)).

¹⁴ Allison, Exh. AA-5 (Supplemental Attachment B to Avista Response to Public Counsel Data Request No. 107).

¹⁵ Allison, Exh. AA-6 (Avista Supplemental Response to Public Counsel Data Request No. 107).

¹⁶ *Id.*

1 **Q. Has Avista provided any satisfactory explanations for its decision to lower its gas**
2 **transport optimization revenue projection from forwards-based values?**

3 A. No. Avista has not offered any reasonable explanations for this decision. Instead,
4 Avista's departure from its forwards-based projection of natural gas transport
5 optimization revenues appears to be an instance of deliberate bias in Avista's setting of
6 authorized net power costs.

7 **Q. Has Avista identified any other instances in which it relied on historical data to**
8 **forecast commodity prices for the purpose of setting authorized net power costs?**

9 A. No. When asked, Avista did not identify any other instances in which it relied on
10 historical data to forecast commodity prices used to set authorized net power costs.¹⁷
11 More importantly, Avista's statements suggest that the Company relied on forwards to set
12 AECO and Malin natural gas prices for the purposes of its AURORA_{XMP} power cost
13 modeling but rejected those same forwards-based assumptions when projecting gas
14 transport optimization revenues. Such use of a contradictory set of assumptions within
15 the same modeling process is clearly unreasonable.

16 **Q. At the time of Avista's modeling of 2018 pro forma net power costs, did recent**
17 **"history" support Avista's determination to manually reduce its forwards-based**
18 **projected gas transport optimization revenues?**

19 A. No. At the time of Avista's 2017 rate case calculations, recent history already showed a
20 trend of an increasing AECO-Malin spread and increasing gas transport optimization

¹⁷ Allison, Exh. AA-4 (Avista Response to Public Counsel Data Request No. 117(b)).

1 revenues.¹⁸ In addition, Avista had already experienced 2016 natural gas transport
2 optimization revenues of \$11.2 million, \$2.2 million more than the level to which it
3 subjectively reduced its pro forma gas transport optimization revenue projection.¹⁹

4 **Q. Was “price uncertainty” a valid justification for Avista to reject its own forwards-**
5 **based projection of natural gas transport optimization revenues?**

6 A. No. Price uncertainty is present in any forecasting exercise and can cut both ways,
7 causing actual costs and revenues to be either lower or higher than expected. Using
8 “uncertainty” as an excuse to justify a lower revenue value than indicated by forwards is
9 a clear marker of bias. In this case, Avista’s forwards-based projections turned out to be
10 substantially *lower* than its actual natural gas transport optimization revenues. Whereas
11 Avista’s forwards-based projection indicated 2018 gas transport optimization revenues of
12 \$13.8 million, Avista actually earned \$20.5 million in gas transport optimization revenues
13 in 2018.²⁰

14 **Q. Does the bias in Avista’s setting of 2018 pro forma natural gas transport**
15 **optimization revenues entirely explain the discrepancy between Avista’s actual and**
16 **authorized 2018 net power costs?**

17 A. No. There are likely numerous factors underlying the discrepancy between Avista’s
18 actual and authorized 2018 net power costs. Some of these factors may lie outside of
19 Avista’s control. However, the example of bias in Avista’s *process* for setting 2018
20 authorized natural gas transport optimization revenues indicates that substantial portions

¹⁸ Allison, Exh. AA-7 (Supplemental Attachment C to Avista Response to Public Counsel Data Request No. 107).

¹⁹ *Id.*

²⁰ *Id.*

1 of the overall discrepancy are a direct result of Avista's biased decision-making. Such
2 sources of discrepancy are inappropriate and unreasonable. They are also the easiest
3 sources of discrepancy to fix.

III. CONCLUSIONS AND RECOMMENDATIONS

4 **Q. Please summarize your conclusions and recommendations relating to Avista's**
5 **setting of 2018 authorized net power costs.**

6 A. I conclude that Avista's process for setting 2018 authorized net power costs was biased in
7 a way that led to unreasonably high electricity rates. It is reasonable for the Commission
8 to allow the ongoing power cost workshop process to proceed as the primary effort to
9 correct the bias in Avista's net power cost calculations. However, the Commission should
10 reaffirm its stance that Avista's net power cost calculations are directionally biased. In
11 addition, the Commission should require Avista to implement corrections to identified
12 biases and errors in its net power cost calculations no later than its next rate case.

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

14 A. Yes, it does.