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May 24, 2021

SENT VIA WEB PORTAL

Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

Re: *WUTC v. Avista Corp.*, 2020 General Rate Case
Dockets UE-200900 and UG-200901

Dear Mr. Johnson:

Public Counsel has identified several updates to discovery data and minor, non-substantive typographical errors in the response testimony filed on April 21, 2021 in the above-referenced dockets. Pursuant to WAC 480-07-460(1)(a) and WAC 480-07-460(6), Public Counsel would like to correct these errors and address these updates with the enclosed revised versions of the response testimonies and exhibits listed here:

Andrea C. Crane, Exh. ACC-3r-8r
Response Testimony of Glenn A. Watkins, Exh. GAW-1Tr
Response Testimony of J.R. Woolridge, Exh. JRW-1Tr
J.R. Woolridge, Exh. JRW-8r

Due to clarifications provided in discovery responses, Public Counsel has revised the response testimony of Glenn A. Watkins, Exh. GAW-1T to strike a portion of the testimony that is no longer applicable. This revision will be further explained in the cross-answering testimony of Mr. Watkins that will be filed on May 28, 2021.

Additionally, Public Counsel received updated employee benefit expense data from Avista in response to data requests too close in time to incorporate into the response testimony and exhibits of Andrea C. Crane. Ms. Crane noted this issue in her response testimony stating that she would update her revenue requirement numbers in her cross-answering testimony. Public

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Counsel is filing these revised Exhibits ACC-3r through ACC-8r in advance of Ms. Crane's cross-answering testimony. The only change to these exhibits is the employee benefit expense adjustment, but Public Counsel is filing a full set of updated exhibits to replace the previous versions to minimize confusion.

Finally, please find enclosed the revised excel spreadsheets of each exhibit listed above and an errata listing the corrections and revisions to the above testimonies and exhibits.

Sincerely,

/s/ 

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Assistant Attorney General
Public Counsel
(206) 389-2055

NMS/KMB

Enclosures

cc: Service List (E-mail)

Washington Utilities and Transportation Commission v. Avista Corporation

DOCKET NOS. UE-200900 and UG-200901

Errata to Response Testimony filed on April 21, 2021

Document	Page:Line	Revision
Exh. ACC-3	1, Row Line 4	“115,110” should be “114,147”
Exh. ACC-3	1, Row Line 5	“\$5,457” should be “\$6,420”
Exh. ACC-3	1, Row Line 7	“\$7,225” should be “\$8,500”
Exh. ACC-3	1, Row Line 7	“(7,225)” should be “(8,500)”
Exh. ACC-3	1, Row Line 9	“1.36%” should be “1.60%”
Exh. ACC-3	1, Row Line 9	“-1.36%” should be “-1.60%”
Exh. ACC-3	1, Row Line 11	“1.36%” should be “1.60%”
Exh. ACC-3	1, Row Line 11	“-1.43%” should be “-1.68%”
Exh. ACC-4	4, Row Line 7	Add “427”
Exh. ACC-4	4, Row Line 12	Add “427”
Exh. ACC-4	4, Row Line 13	Add “268”
Exh. ACC-4	4, Row Line 16	Add “268”
Exh. ACC-4	4, Row Line 17	Add “122”
Exh. ACC-4	4, Row Line 18	Add “12”
Exh. ACC-4	4, Row Line 20	Add “390”
Exh. ACC-4	4, Row Line 24	Add “390”
Exh. ACC-4	4, Row Line 25	Add “1,219”
Exh. ACC-4	4, Row Line 26	Add “(1,219)”
Exh. ACC-4	4, Row Line 27	Add “(256)”
Exh. ACC-4	4, Row Line 31	“\$0” should be “(\$963)”
Exh. ACC-4	4, Row Line 51	Add “1,275”
Exh. ACC-4	7, Row Line 7	“145,779” should be “146,206”
Exh. ACC-4	7, Row Line 12	“270,796” should be “271,223”
Exh. ACC-4	7, Row Line 13	“29,957” should be “30,225”
Exh. ACC-4	7, Row Line 16	“91,933” should be “92,201”
Exh. ACC-4	7, Row Line 17	“11,686” should be “11,808”
Exh. ACC-4	7, Row Line 18	“1,611” should be “1,623”
Exh. ACC-4	7, Row Line 20	“53,237” should be “53,627”
Exh. ACC-4	7, Row Line 24	“98,516” should be “98,906”
Exh. ACC-4	7, Row Line 25	“474,542” should be “475,761”
Exh. ACC-4	7, Row Line 26	“127,530” should be “126,311”
Exh. ACC-4	7, Row Line 27	“5,690” should be “5,434”

Exh. ACC-4	7, Row Line 31	“115,110” should be “114,147”
Exh. ACC-4	7, Row Line 51	“7,225” should be “8,500”
Exh. ACC-5	Row “3.06 Employee Benefits Expense”, Column “Recommended”	“0” should be “1,275”
Exh. ACC-5	Row “3.06 Employee Benefits Expense”, Row “Difference”	“(1,171)” should be “104”
Exh. ACC-5	Row “Total Adjustments”	“(\$36,958)” should be “(\$35,683)”
Exh. ACC-5	Row “Recommended Base Revenue Increase”	“\$7,225” should be “\$8,500”
Exh. ACC-6	1, Row Line 4	“25,782” should be “25,488”
Exh. ACC-6	1, Row Line 5	“\$3,027” should be “\$3,321”
Exh. ACC-6	1, Row Line 7	“\$4,007” should be “\$4,396”
Exh. ACC-6	1, Row Line 7	“(4,007)” should be “(4,396)”
Exh. ACC-6	1, Row Line 9	“3.81%” should be “4.18%”
Exh. ACC-6	1, Row Line 9	“-3.81%” should be “-4.18%”
Exh. ACC-6	1, Row Line 11	“2.48%” should be “2.72%”
Exh. ACC-6	1, Row Line 11	“-2.48%” should be “-2.72%”
Exh. ACC-7	3, Row Line 6	Add “11”
Exh. ACC-7	3, Row Line 8	Add “11”
Exh. ACC-7	3, Row Line 13	Add “167”
Exh. ACC-7	3, Row Line 16	Add “167”
Exh. ACC-7	3, Row Line 17	Add “78”
Exh. ACC-7	3, Row Line 18	Add “8”
Exh. ACC-7	3, Row Line 20	Add “108”
Exh. ACC-7	3, Row Line 24	Add “108”
Exh. ACC-7	3, Row Line 25	Add “372”
Exh. ACC-7	3, Row Line 26	Add “(372)”
Exh. ACC-7	3, Row Line 27	Add “(78)”
Exh. ACC-7	3, Row Line 31	Add “(294)”
Exh. ACC-7	3, Row Line 51	“0” should be “389”
Exh. ACC-7	5, Row Line 6	“972” should be “983”
Exh. ACC-7	5, Row Line 8	“972” should be “983”
Exh. ACC-7	5, Row Line 13	“12,953” should be “13,120”
Exh. ACC-7	5, Row Line 16	“34,075” should be “34,242”
Exh. ACC-7	5, Row Line 17	“6,631” should be “6,709”
Exh. ACC-7	5, Row Line 18	“1,190” should be “1,198”
Exh. ACC-7	5, Row Line 20	“15,713” should be “15,821”
Exh. ACC-7	5, Row Line 24	“31,498” should be “31,606”
Exh. ACC-7	5, Row Line 25	“76,876” should be “77,248”
Exh. ACC-7	5, Row Line 26	“28,911” should be “28,539”

Exh. ACC-7	5, Row Line 27	“(4,004)” should be “(4,082)”						
Exh. ACC-7	5, Row Line 31	“25,782” should be “25,488”						
Exh. ACC-7	5, Row Line 50	“4,007” should be “4,396”						
Exh. ACC-8	Row “3.06 Employee Benefits Expense”, Column “Recommended”	“0” should be “389”						
Exh. ACC-8	Row “3.06 Employee Benefits Expense”, Row “Difference”	“(357)” should be “32”						
Exh. ACC-8	Row “Total Adjustments”	“(\$8,784)” should be “(\$8,395)”						
Exh. ACC-8	Row “Recommended Base Revenue increase”	“\$4,006” should be “\$4,395”						
Exh. GAW-1T	General	Testimony exhibit label inserted in the upper right-hand corner.						
Exh. GAW-1T	19:18–20:12	Strike starting at “In this regard, Ms...” from 19:18 to 20:12. (Explanation in the Cross-Answering Testimony of Glenn A. Watkins, GAW-7T).						
Exh. JRW-1T	General	Testimony exhibit label inserted in the upper right-hand corner.						
Exh. JRW-1T	5:1	“6.83 percent” should be “6.92 percent”						
Exh. JRW-1T	21:16	“median” should be “mean”						
Exh. JRW-1T	43:9–10	Strike the sentence “I believe that the appropriate DCF growth rate is 5.0 percent.”						
Exh. JRW-1T	43:20	“5.5 percent” should be “5.0 percent”						
Exh. JRW-1T	59, Table 8, Row “McKenzie Proxy Group”, Column “DCF”	“8.75%” should be “9.05%”						
Exh. JRW-1T	59, Table 8, Row “Gas Proxy Group”, Column “CAPM”	“7.30%” should be “7.60%”						
Exh. JRW-1T	59, Table 8, Row “Gas Proxy Group”, Column “DCF”	“8.85%” should be “8.70%”						
Exh. JRW-8	6, Columns “Projected <i>Value Line</i> Growth in EPS, DPS, and BVPS” and “Sustainable Growth ROE * Retention Rate”	Every cell, originally “0.0%” should be as below: <table border="1" data-bbox="1031 1789 1416 1864"> <tr> <td>5.0%</td> <td>5.5%</td> <td>6.2%</td> </tr> <tr> <td>3.7%</td> <td>4.0%</td> <td>3.9%</td> </tr> </table>	5.0%	5.5%	6.2%	3.7%	4.0%	3.9%
5.0%	5.5%	6.2%						
3.7%	4.0%	3.9%						