

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

|                           |   |                          |
|---------------------------|---|--------------------------|
| WASHINGTON UTILITIES AND  | ) |                          |
| TRANSPORTATION COMMISSION | ) | DOCKETS UE-190334,       |
|                           | ) | UG-190335, and UE-190222 |
|                           | ) | <i>(Consolidated)</i>    |
| Complainant,              | ) |                          |
|                           | ) |                          |
| v.                        | ) |                          |
|                           | ) |                          |
| AVISTA CORPORATION d/b/a  | ) |                          |
| AVISTA UTILITIES          | ) |                          |
|                           | ) |                          |
| Respondent.               | ) |                          |
| _____                     | ) |                          |

**EXHIBIT LDK-3  
AVISTA RESPONSES TO DATA REQUESTS  
(REDACTED)**

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 07/18/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews              |
| REQUESTER:    | UTC Staff             | RESPONDER:     | Annette Brandon                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs             |
| REQUEST NO.:  | Staff – 080           | TELEPHONE:     | (509) 495-4324                 |
|               |                       | EMAIL:         | annette.brandon@avistacorp.com |

**REQUEST:**

*Please treat this as an ongoing data request.* Referring to the Direct Testimony of Elizabeth Andrews, page 51, lines 17-20, when the 2020 actuary report is available sometime in the second or third quarter of 2019, please provide an update to adjust the pension expense.

**RESPONSE:**

Please see Avista's **CONFIDENTIAL** response to data request Staff-DR-080C. Please note that Avista's response to Staff-DR-080C is **Confidential per Protective Order in UTC Dockets UE-190334 and UG-190335**.

Please see Staff-DR-080C Confidential Attachment A for the revised pension expense estimate.

Please see Staff-DR-080 Attachment B for a revised 3.05 Pro-Forma Employee Benefits workpaper reflecting these updated estimates. The net impact of this change is a reduced adjustment to expense for Washington Electric of \$642,866 (original \$2,637,595 vs revised \$1,994,729) and Washington Natural gas of \$195,055 (original \$800,286 vs. revised \$605,231).

A

| Task Name                                   | Task Number | Year End<br>YE 12.31.2018 | Pro-Forma<br>YE 12.31.2019 | Adjustment       |
|---|-------------|---------------------------|----------------------------|------------------|
| Health Insurance (Premera and Group Health) | 926220      | 22,645,974                | 25,350,000                 | 2,704,026        |
| Health Insurance (High Deductible Plan)     | 926221      | 1,430,306                 | 1,500,000                  | 69,694           |
| FAS 106 (Post-Retirement Medical)           | 926240      | 8,541,714                 | 8,900,000                  | 358,286          |
| <b>Total Medical</b>                        |             | <b>32,617,994</b>         | <b>35,750,000</b>          | <b>3,132,006</b> |
| 401 (k)                                     | 926225      | 9,138,892                 | 9,800,000                  | 661,108          |
| 401(K) Non-Elect Con                        | 926226      | 905,072                   | 1,100,000                  | 194,928          |
| Pension FAS 87                              | 926230      | 20,611,101                | 24,000,000                 | 3,388,899        |
| <b>Total Retirement</b>                     |             | <b>30,655,065</b>         | <b>34,900,000</b>          | <b>4,244,935</b> |
| <b>Total</b>                                |             | <b>63,273,059</b>         | <b>70,650,000</b>          | <b>7,376,941</b> |
| O & M Percent                               |             | 56.31%                    | 56.31%                     | 56.31%           |
| Total O&M                                   |             | \$ 35,629,060             | \$ 39,783,015              | \$ 4,153,955     |

| Actual 12 ME 12.31.2018   | Total Labor \$   | Percent of Total |              |
|---------------------------|------------------|------------------|--------------|
| Washington Electric Labor | \$ 47,209,508.35 |                  |              |
| Total OPER Labor          | \$ 98,302,568.00 | 48.02%           | \$ 1,994,729 |
| Idaho Electric Labor      | \$ 22,775,635.65 |                  |              |
| Total OPER Labor          | \$ 98,302,568.00 | 23.17%           | \$ 962,471   |
| Washington Gas Labor      | \$ 14,320,227.36 |                  |              |
| Total OPER Labor          | \$ 98,302,568.00 | 14.57%           | \$ 605,231   |
| Idaho Gas Labor           | \$ 5,520,412.64  |                  |              |
| Total OPER Labor          | \$ 98,302,568.00 | 5.62%            | \$ 233,452   |
| Oregon Gas Labor          | \$ 8,476,784.00  |                  |              |
| Total OPER Labor          | \$ 98,302,568.00 | 8.62%            | \$ 358,071   |
| Total                     | \$ 98,302,568.00 | 100.00%          | \$ 4,153,954 |

**Benefit Expense Adjustment**

Cognos Query  
Ran: 02.04.19  
Accounting Period: 01.01.2018 through 12.31.2018

| Summary EXP Category |                      | Non-Labor                 |                           |   |  |
|----------------------|----------------------|---------------------------|---------------------------|---|--|
|                      |                      | Actual                    | Pro-Forma 2020            |   |  |
| Task Number          | Task Name            | Sum of Transaction Amount | Sum of Transaction Amount | Description   |  |
| 926220               | Health Insurance     | \$ 22,645,974             | \$ 25,350,000             | Estimate Provided by Compensation Consultant - Mercer                       |  |
| 926221               | Health Insure - HDHP | \$ 1,430,306              | \$ 1,500,000              | Estimate Provided by Compensation Consultant - Mercer                       |  |
| 926240               | FAS 106              | \$ 2,868,055              | \$ 2,400,000              | Estimate Provided by Compensation Consultant - Willis Towers Watson 03.2019 |  |
| 926251               | FAS 106 NS           | \$ 5,673,659              | \$ 6,500,000              | Estimate Provided by Compensation Consultant - Willis Towers Watson 03.2019 |  |
| 926225               | 401 (k)              | \$ 9,138,892              | \$ 9,800,000              | Estimate based on historical actual   |  |
| 926226               | 401(K) Non-Elect Con | \$ 905,072                | \$ 1,100,000              | Estimate based on historical actual   |  |
| 926230               | Pension FAS 87       | \$ 21,595,661             | \$ 16,600,000             | Estimate Provided by Compensation Consultant - Willis Towers Watson 03.2019 |  |
| 926253               | Pension FAS 87 NS    | \$ (984,560)              | \$ 7,400,000              | Estimate Provided by Compensation Consultant - Willis Towers Watson 03.2019 |  |
| Grand Total          |                      | \$ 63,273,059             | \$ 70,650,000             |   |  |

Adjustment No. 3.05 Pro Forma Employee Benefits

Accounting Period BETWEEN '201801' AND '201812', , Expenditure Type Parameter 1 : '510 Payroll Benefits loading'

Workpaper Ref. Non-Util Benefit Calc

Accounting Period:<All>

| Expenditure Type             | Desc     | Transaction Amount |           |               |           | Total      |
|------------------------------|----------|--------------------|-----------|---------------|-----------|------------|
|                              |          | CAP                | NONOP     | OPER          | OTHER     |            |
| 510 Payroll Benefits loading | Projects | 19,552,605         | 1,201,740 | 35,288,718    | 6,621,116 | 62,664,179 |
| Total                        |          | 19,552,605         | 1,201,740 | 35,288,718    | 6,621,116 | 62,664,179 |
|                              | Percent  | 31.20%             | 1.92%     | <b>56.31%</b> | 10.57%    | 100.00%    |

Breakdown by Component

Electric

(Non-Exec Labor Adjust)

|                   |            |      |    |         |
|-------------------|------------|------|----|---------|
| Production        | 7,256,066  | 31%  | \$ | 298,366 |
| Transmission      | 1,969,047  | 8%   | \$ | 76,998  |
| Distribution      | 4,926,346  | 21%  | \$ | 202,119 |
| Customer Accounts | 1,890,322  | 8%   | \$ | 76,998  |
| Customer Service  | 196,465    | 1%   | \$ | 9,625   |
| Admin and General | 7,332,616  | 31%  | \$ | 298,366 |
| Total             | 23,570,862 | 100% | \$ | 962,471 |

Breakdown by Component

Natural Gas

(Non-Exec Labor Adjust)

|                     |           |      |    |         |
|---------------------|-----------|------|----|---------|
| Production          | 224,174   | 4%   | \$ | 9,338   |
| Underground Storage | 3,768     | 0%   | \$ | -       |
| Distribution        | 2,391,299 | 42%  | \$ | 98,050  |
| Customer Accounts   | 1,158,251 | 20%  | \$ | 46,690  |
| Customer Service    | 124,036   | 2%   | \$ | 4,669   |
| Admin and General   | 1,807,186 | 32%  | \$ | 74,705  |
| Total               | 5,708,714 | 100% | \$ | 233,452 |

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

|               |                       |                |                           |
|---------------|-----------------------|----------------|---------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/02/2019                |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Dennis Vermillion         |
| REQUESTER:    | AWEC                  | RESPONDER:     | Patrick Ehrbar            |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs        |
| REQUEST NO.:  | AWEC - 009            | TELEPHONE:     | (509) 495-8620            |
|               |                       | EMAIL:         | pat.ehrbar@avistacorp.com |

**REQUEST:**

Does Avista agree that it provided safe and reliable service to its customers while it was engaged with the Hydro One merger process? If not, please explain why not and specify how its service was deficient.

**RESPONSE:**

Yes, Avista provided safe and reliable service to our customers during the merger proceedings. Our employees focus on providing excellent service did not waiver. In fact, as Mr. Vermillion discusses in his Direct Testimony on p. 29, during 2018 our customer service surveys indicate that customer satisfaction remains high. Our overall customer satisfaction from our voice-of-the-customer (VOC) surveys for 2018 was 97% in our Oregon, Washington, and Idaho operating divisions, **the highest ever ratings since the Company began tracking VOC over twenty years ago.** The purpose of the VOC Survey is to measure and track customer satisfaction for Avista Utilities' "contact" customers – i.e., customers who have contact with Avista through the Contact Center and/or work performed through an Avista construction office. This rating reflects a positive experience for customers who have contacted Avista related to the customer service or field service they received.

These results can be achieved only with very committed and competent employees. Further, as stated in our Customer Report Card filed as a part of our Washington 2018 Service Quality Measures Program Report filed in Docket U-190351:

**2018 Performance Highlights**

Avista once again exceeded all six of its Customer Service Measures benchmarks for 2018, improving upon its 2017 results for nearly all measures. Among several improvements in service we reported this year was a significant increase in customer satisfaction, based on both customer survey results, as well as a decrease in the number of complaints filed. Additionally, there was an increase in overall Electric System Reliability in 2018, with the average occurrence of outages per customer, per year (not related to a major storm event) and the average duration of such outages both decreasing. As a result, our five-year average value for duration of service outages decreased by 2 minutes, as opposed to the nine minute increase seen in 2017. The Company is also pleased to have met 99.48% of its applicable Customer Service Guarantee commitments, providing customers a guarantee credit in just 319 out of 61,294 applicable cases. Avista will continue to pursue our mission of improving our customers' lives through innovative energy solutions into 2019, providing safe, affordable, and reliable service now and into the future.

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

|               |                     |                |                            |
|---------------|---------------------|----------------|----------------------------|
| JURISDICTION: | Washington          | DATE PREPARED: | 09/05/2019                 |
| CASE NO.:     | UE-190334/UG-190335 | WITNESS:       | Elizabeth Andrews          |
| REQUESTER:    | AWEC                | RESPONDER:     | Liz Andrews                |
| TYPE:         | Data Request        | DEPT:          | Regulatory Affairs         |
| REQUEST NO.:  | AWEC – 034          | TELEPHONE:     | (509) 495-8601             |
|               | Supplemental        | EMAIL:         | liz.andrews@avistacorp.com |

**REQUEST:**

Please refer to Exhibit DPV-1T, page 19, lines 12 to 17.

- a. Please identify the total amount charged to non-utility accounts related to Hydro-One by month from January 2017 to present.
- b. Please identify the total amount charged to non-utility accounts unrelated to Hydro-One by month from January 2017 to present.
- c. Please include transaction level detail for these charges.

**RESPONSE:**

The total cost to Avista for the failed Hydro One merger was approximately \$52 million, made of approximately \$38 million in transaction costs and \$14 million of related income taxes between 2017 and 2019. There were no charges allocated to any of our jurisdictions; costs for the failed Hydro One Merger were charged to shareholders, and no costs are included in the rate request.

**SUPPLEMENTAL REPSONE 09.06.2019:**

See AWEC-034 Supplemental Attachment A for all Hydro-One merger related charges from 2017 – April 2019 charged directly to non-utility expense. These costs are separated between non-utility labor and non-utility non-labor expenses, totaling approximately \$38 million.

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

|               |                     |                |                               |
|---------------|---------------------|----------------|-------------------------------|
| JURISDICTION: | Washington          | DATE PREPARED: | 08/12/2019                    |
| CASE NO.:     | UE-190334/UG-190335 | WITNESS:       | Elizabeth Andrews             |
| REQUESTER:    | AWEC                | RESPONDER:     | Jennifer Smith                |
| TYPE:         | Data Request        | DEPT:          | Regulatory Affairs            |
| REQUEST NO.:  | AWEC - 035          | TELEPHONE:     | (509) 495-2098                |
|               |                     | EMAIL:         | Jennifer.smith@avistacorp.com |

**REQUEST:**

Please identify the amount of the termination fee received from Hydro One and provide Avista's planned rate treatment of the termination fee.

**RESPONSE:**

The total termination fee received from Hydro One was \$103 million. The Termination Fee does not represent utility revenue, nor was the fee derived from rates collected from customers or from the sale of utility assets funded by customers. Therefore the termination fee has not been included in Avista's ratemaking.



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

|               |                       |                |                             |
|---------------|-----------------------|----------------|-----------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/20/2019                  |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews           |
| REQUESTER:    | AWEC                  | RESPONDER:     | Jeanne Pluth                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs          |
| REQUEST NO.:  | AWEC - 040            | TELEPHONE:     | (509) 495-2204              |
|               |                       | EMAIL:         | jeanne.pluth@avistacorp.com |

**REQUEST:**

Please refer to Avista workpaper 12A-2018.12\_Avista Electric Pull.xlsm sheet E-456.

- a. Please provide a more detailed description for each account in this sheet.
- b. Did Avista receive revenue for pole attachments of 5G cellular equipment in 2018? If yes, what account were these revenues included in?
- c. Does Avista expect to receive revenue for pole attachments of 5G cellular equipment in 2020? If no, why not? If yes, please provide the expected revenue and supporting documentation.

**RESPONSE:**

- a. Please see AWEC-DR-040-Attachment A for additional information regarding miscellaneous revenue recorded in FERC Account 456XXX.
- b. This attachment also includes detail for FERC Account 454XXX. The Company records pole attachment revenue in FERC Account 454XXX. The pole attachment revenue is identified as "REVPOLE" in Source ID field. None of the revenue earned in 2018 for pole attachments was for 5G cellular equipment.
- c. Avista does expect to have additional revenue from additional equipment being added for 5G cellular equipment and estimates are an additional \$20,000 in 2020. These are initial estimates based on high-level discussions, and therefore, the Company does not have any documentation to provide that would makes these estimates "known and measureable".

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/16/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews              |
| REQUESTER:    | AWEC                  | RESPONDER:     | Annette Brandon                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs             |
| REQUEST NO.:  | AWEC - 047            | TELEPHONE:     | (509) 495-4324                 |
|               |                       | EMAIL:         | Annette.brandon@avistacorp.com |

**REQUEST:**

Please refer to Exh. EMA-1T page 50

- a. Please provide all documents and workpapers provided to or received from Willis Towers Watson and Mercer.
- b. Please provide all estimates of pension and medical costs from 2009 and 2018.
- c. Please provide actual pension and medical costs from 2009 through 2018.

**RESPONSE:**

Please see the Company's response in AWEC-DR-047C for the requested information. AWEC-DR-047C is **CONFIDENTIAL SUBJECT TO GENERAL PROTECTIVE ORDER**.

- a. Please see the Company's response to Staff\_DR\_018 for the premium sheets and the Avista Corporation 2019 Benefits Renewal Calculation, and Assumptions and Caveats from Mercer.

Please see Company's response to Staff\_DR\_080 for the summary of actuarial estimates received from Willis Towers Watson.

Please see AWEC-DR-047C Confidential Attachments A and B, respectively for the Plan Documents for both the Pension and Post-Retirement Plan.

- b.-c. Please see AWEC-DR-047 Attachment C for the actual and estimated/budgeted pension and medical benefits for 2009 through 2018.

Summary EXP Category Non-Labor

| Task Number        | Task Name            | Accounting Year     |                     |                     |                     |                     |                     |                     |                     |                     |                     |  |
|--------------------|----------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|--|
|                    |                      | 2009                | 2010                | 2011                | 2012                | 2013                | 2014                | 2015                | 2016                | 2017                | 2018                |  |
| 926220             | Health Insurance     | \$16,866,576        | \$17,032,726        | \$17,801,744        | \$18,608,721        | \$19,078,110        | \$19,323,918        | \$20,880,989        | \$25,789,217        | \$22,279,529        | \$22,645,974        |  |
| 926221             | Health Insure - HDHP |                     |                     |                     |                     |                     |                     |                     |                     | \$976,977           | \$1,430,306         |  |
| 926230             | Pension FAS 87       | \$24,220,056        | \$19,483,727        | \$21,937,164        | \$25,768,345        | \$26,815,339        | \$12,634,767        | \$24,379,430        | \$24,649,327        | \$23,938,095        | \$21,595,661        |  |
| 926240             | FAS 106              | \$3,562,087         | \$3,508,043         | \$7,497,849         | \$11,710,363        | \$12,355,579        | \$8,142,682         | \$9,349,596         | \$11,411,512        | \$9,992,979         | \$2,868,055         |  |
| 926251             | FAS 106 NS           |                     |                     |                     |                     |                     |                     |                     |                     |                     | \$5,673,659         |  |
| 926253             | Pension FAS 87 NS    |                     |                     |                     |                     |                     |                     |                     |                     |                     | -\$984,560          |  |
| <b>Grand Total</b> |                      | <b>\$44,648,719</b> | <b>\$40,024,496</b> | <b>\$47,236,757</b> | <b>\$56,087,429</b> | <b>\$58,249,028</b> | <b>\$40,101,367</b> | <b>\$54,610,015</b> | <b>\$61,850,056</b> | <b>\$57,187,580</b> | <b>\$53,229,096</b> |  |

Summary EXP Category Non-Labor

| Task Number        | Task Name            | Accounting Year     |                     |                     |                     |                     |                     |                     |                     |                     |                     |  |
|--------------------|----------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|--|
|                    |                      | 2009                | 2010                | 2011                | 2012                | 2013                | 2014                | 2015                | 2016*               | 2017                | 2018                |  |
| 926220             | Health Insurance     | \$17,920,000        | \$19,101,000        | \$20,270,000        | \$20,285,000        | \$21,165,000        | \$24,040,000        | \$24,507,000        | \$24,187,339        | \$26,535,000        | \$25,535,000        |  |
| 926221             | Health Insure - HDHP |                     |                     |                     |                     |                     |                     |                     |                     | \$800,000           | \$1,100,000         |  |
| 926230             | Pension FAS 87       | \$22,818,200        | \$19,722,000        | \$28,822,000        | \$27,022,000        | \$26,914,000        | \$17,220,000        | \$22,620,000        | \$23,320,000        | \$26,210,000        | \$22,520,000        |  |
| 926240             | FAS 106              |                     |                     | \$3,600,000         | \$10,300,000        | \$12,800,000        | \$10,091,000        | \$9,091,000         | \$10,700,000        | \$10,330,000        | \$3,400,000         |  |
| 926251             | FAS 106 NS           |                     |                     |                     |                     |                     |                     |                     |                     |                     | \$6,900,000         |  |
| 926253             | Pension FAS 87 NS    |                     |                     |                     |                     |                     |                     |                     |                     |                     | \$600,000           |  |
| <b>Grand Total</b> |                      | <b>\$40,738,200</b> | <b>\$38,823,000</b> | <b>\$52,692,000</b> | <b>\$57,607,000</b> | <b>\$60,879,000</b> | <b>\$51,351,000</b> | <b>\$56,218,000</b> | <b>\$58,207,339</b> | <b>\$63,875,000</b> | <b>\$60,055,000</b> |  |

Note:

The Health Insurance numbers above represent the premium estimates provided by Mercer. This amount would not include the IBRN adjustment (reduction) made by the Corporate Accounting team.  
Information not readily available for FAS106 for 2009 and 2010 (highlighted in darker blue)

KEY:

|                         |   |
|-------------------------|---|
| Health Insurance:       | Premera and Group Health Group Plan   |
| Health Insurance - HDHP | Premera High Deductible Health Plan   |
| Pension FAS 87          | Pension Benefit for active employees  |
| Pension FAS 87 NS       | Pension Benefit related only to Non-Service Component. New Accounting guidelines require the components be tracked seperately |
| FAS 106                 | Post Retirement Medical Plan  |
| FAS 106 NS              | Post Retirement Medical for Non-Service. New accounting guidelines require components be tracked seperately.                  |

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/20/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews              |
| REQUESTER:    | AWEC                  | RESPONDER:     | Annette Brandon                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs             |
| REQUEST NO.:  | AWEC - 048            | TELEPHONE:     | (509) 495-4324                 |
|               |                       | EMAIL:         | Annette.brandon@avistacorp.com |

**REQUEST:**

Please provide the total number of Avista shares held by Avista executives and board of directors on January 1, 2017 and July 1, 2017

**RESPONSE:**

Please see below for the number of shares held by executives and board of directors on the dates requested:

Officers:

January 1, 2017 - 409,009.2908

July 1, 2017 - 516,675.5330

Directors:

January 1, 2017 - 154,094.5716

July 1, 2017 - 171,227.7081

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

|               |                       |                |                           |
|---------------|-----------------------|----------------|---------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 8/16/2019                 |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Joseph Miller             |
| REQUESTER:    | AWEC                  | RESPONDER:     | Joe Miller                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs        |
| REQUEST NO.:  | AWEC – 056            | TELEPHONE:     | (509) 495-4546            |
|               |                       | EMAIL:         | joe.miller@avistacorp.com |

**REQUEST:**

Please refer to Exh. JDM-1T, page 8, Table 5.

- a. Why does Avista propose rates for Schedule 25 that are further from unity than present?
- b. Is Avista opposed to rates that bring Schedule 25 closer to unity? If yes, why?

**RESPONSE:**

- a. As stated in the direct testimony of Company witness Miller, the Company is cognizant that most of the parties that participate in the Company's general rate cases are also involved in the on-going cost of service workshops (Docket Nos. UE-170002 and UG-170003). Until such time that these dockets conclude, and changes can be incorporated into the Company's cost of service study, the Company chose to apply an equal percentage of revenue increase unless individual rate schedules were significantly above or below their relative cost of service both in the study conducted for this proceeding, and historically from multiple studies conducted by both the Company and other parties. Given Schedule 25's relative proximity to cost of service (unity) in both this proceeding and cost studies from multiple parties in recent years, an equal percentage of revenue was applied to Schedule 25.
- b. No.

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/27/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                     |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC – 073            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Did Avista bid out the Avistautilities.com Redesign project? If so, please provide the RFP and all responses. If not, please explain why not.

**RESPONSE:**

Please see the Company's response in AWEC-DR-073C for the requested information. AWEC-DR-073C is **CONFIDENTIAL SUBJECT TO GENERAL PROTECTIVE ORDER**.

Yes, Avista bid out the avistautilities.com redesign project, in 2 separate phases. Phase 0 was the initial phase to create the design blueprint, as shown in AWEC-DR-073C CONFIDENTIAL Attachment A. Phase 1 was the implementation of the new web site (myavista.com) and is included in AWEC-DR-073C CONFIDENTIAL Attachment B along with the responses from the vendor.

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/27/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                     |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 083            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Please explain how the Avistautilities.com Redesign and the Customer Facing Technology programs specifically benefit customers on: (1) Electric Schedule 25; (2) gas schedule 146; and (3) gas schedule 148.

**RESPONSE:**

The project benefits all customers who want to view and pay their bill on line, access account data, billing and usage history, or general information about the Company and its products and services. See also Avista's response to AWEC-DR-071, 088 and 090.

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

|               |                       |                |                           |
|---------------|-----------------------|----------------|---------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/26/2019                |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                |
| REQUESTER:    | AWEC                  | RESPONDER:     | Andy Leija                |
| TYPE:         | Data Request          | DEPT:          | Enterprise Technology     |
| REQUEST NO.:  | AWEC - 084            | TELEPHONE:     | (509) 495-4602            |
|               |                       | EMAIL:         | andy.leija@avistacorp.com |

**REQUEST NO:**

Referring to JMK-3 at 2-6, please provide any additional documents or information other than the referenced business case that Avista management reviewed before approving the requested funding for the Technology Refresh to Sustain Business Process described in this business case.

**RESPONSE:**

Avista's Technology Department serves as a shared service business unit that supports technology infrastructure and information systems for the enterprise. The technology business cases, such as Technology Refresh (5005); Technology Expansion (5006); Endpoint Compute and Productivity Systems (5016); Enterprise and Control Network Systems (5020); and Customer Facing Technology Program (5151) have three levels of governance where discussions, guidance and review take place prior to the project being requested for funding: the Executive Technology Steering Committee (ETSC); the Technology Planning Group (TPG) of Directors; and respective Program and Project Steering Committees. Applicable stakeholders and disciplines meet regularly to govern, review and approve the business cases and subsequent programs and projects (i.e. software delivery, electrical engineering, accounting, energy delivery, technology, etc.).

The TPG sets priority across the technology investment portfolio, balancing: strategic alignment, business value, and customer benefits, as driven by the strategic initiatives established by the ETSC. The Capital Planning Group (CPG), an independent body, establishes annual funding allocations for each Business Case across the enterprise, including 5005, 5006, 5016, 5020 and 5151, respectively. The CPG presents the plan to Avista's senior executives who provide feedback and ultimately approve the infrastructure plan, which is then approved by the Board Finance Committee.

During an annual planning cycle (July – September), the Business Case owner surfaces the project demand for the upcoming five years to the TPG and ETSC. After review for resource capacity, strategic alignment, and risk, the investment plan is submitted to the CPG for funding consideration across all other Business Cases. The CPG then provides a revised funding allocation to each Business Case. The revised allocation then requires the TPG to review and update the investment plan to fit within the revised funding allocation. This establishes the annual investment plan under this Business Case.

In addition to the reviews mentioned above, please see AWEC-DR-084 Attachment A- '2018-2019 Consolidated Tech Investment Plan' that was reviewed by the TPG and submitted for funding consideration to the CPG during each respective annual planning cycle. The first tab shows the requested funding for the first submission and second submission for several business cases. As noted in JMK-1T, and in the Company's response to AWEC-DR-078 the Company sunset the Technology Refresh business case was broken out into smaller business cases, this is demonstrated on the first tab in the workbook. Therefore, there are not any funding requests for this business case beyond 2018. The second tab of the workbook represents the 2019 requested Technology Investment Plan, both what was requested in 2018 and what was ultimately approved in 2019.



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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/27/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                     |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 086            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Exhibit JMK-3, pages 8-9, states that there is increasing “consumer demand for swift and easy access to their utility service provider to pay their bills, order new services, monitor outage maps, learn of new offerings that relate to their particular needs or lifestyles, and more.”

- a. Please identify each “new service” a customer may order as a consequence of its Technology Expansion to Enable Business Process investments;
- b. Please identify each “new offering” Avista can now provide to customers as a consequence of its Technology Expansion to Enable Business Process investments.

**RESPONSE:**

- a. Customers may start new electric or natural gas service via a self-service channel.
- b. Customers can view and research new offerings through our web site. New offerings include things like finding an HVAC contractor; signing up for billing and/or outage alerts; researching energy efficient appliances through the Avista marketplace; or researching renewable energy options, to name a few.

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/27/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                     |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 087            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Referring to Exhibit JMK-3 at pages 12-17, please provide any additional documents or information other than the referenced business case that Avista management reviewed before approving the requested funding for the Avistautilities.com Redesign described in this business case.

**RESPONSE:**

Please refer to the process noted in the Company's response to AWEC-DR-084.

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/27/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                     |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 088            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

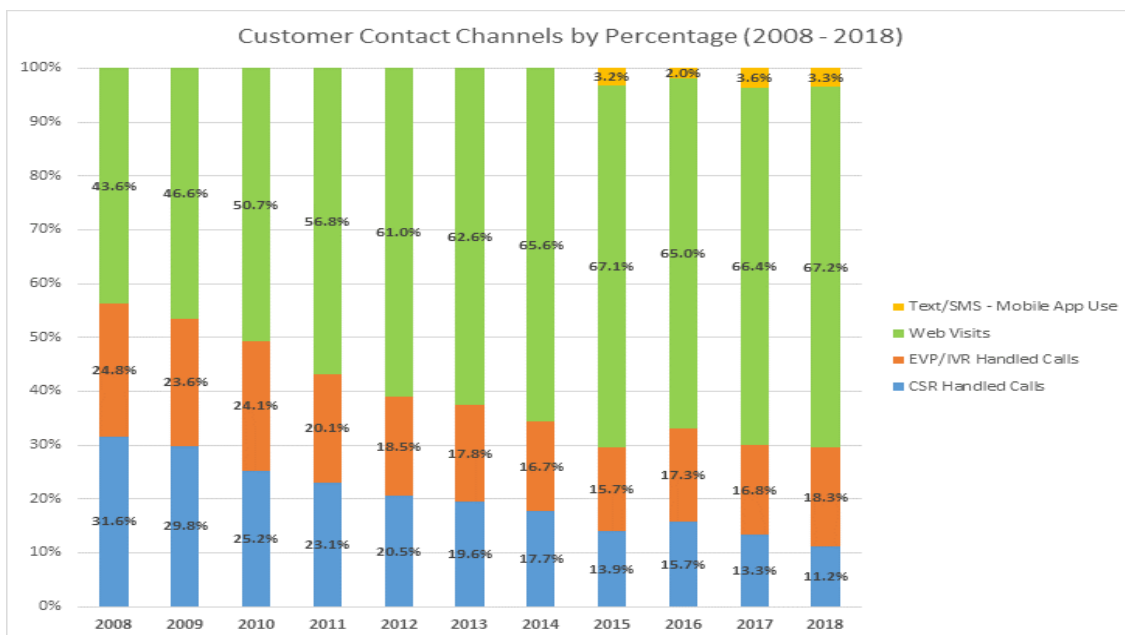
Page 12 of Exhibit JMK-3 states that “since 2002, our web usage has increased 282%. To capture this growing market, and to drive costs out of the business by providing more self-service functionality, Avistautilities.com was launched in January 2008 ....” Please provide all data and analysis Avista has performed to determine the amount of costs that have been driven out of the business since AvistaUtilities.com was launched.

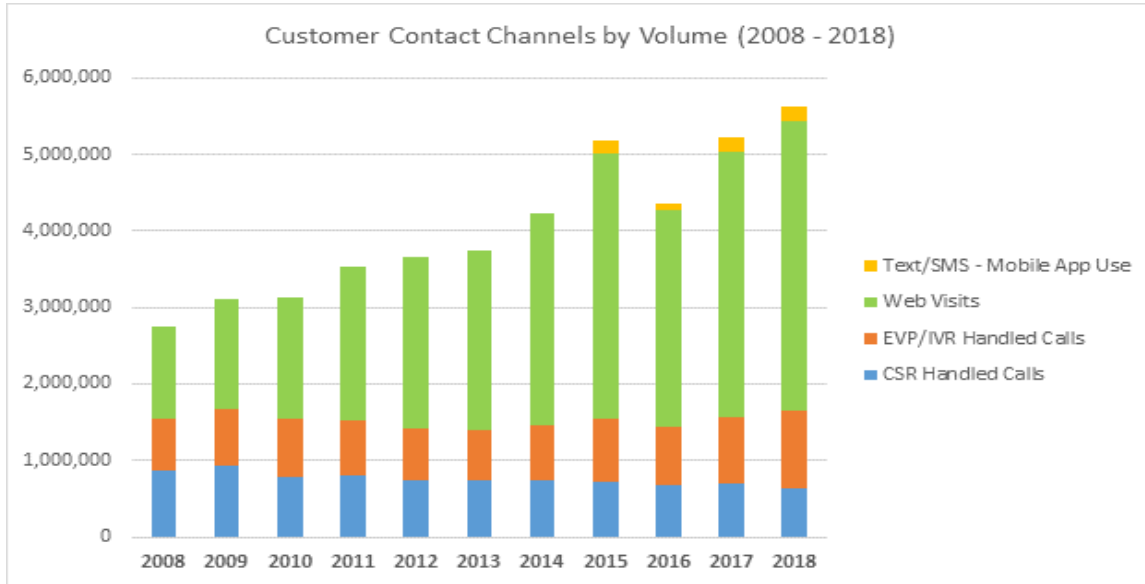
**RESPONSE:**

As described in Exhibit JMK-3, our web/self-service contacts have increased substantially since 2008. See the first chart below. This indicates that more customers, year over year, are choosing to interact with our company through self-service methods.

The second chart demonstrates that our overall number of contacts have Also increased year over year. While self-service channels are increasing, the overall number of contacts our company handles, is also increasing. In 2008, we handled roughly 2.8m contacts; in 2018, we handled about 5.6m contacts.

Customer self-service activities handled through electronic channels would require a live agent if a self-service option was not available. The increase in self-service activity alone has not reduced O&M expenses; these costs have been redeployed to other areas of the business in order to support our customers. This is also discussed in AWEC-DR-071 and AWEC-DR-91.





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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/27/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                     |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 089            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Please provide the total cost to develop the Avistautilities.com website for its launch in 2008.

**RESPONSE:**

The total cost to develop the Avistautilities.com website that launched over 11 years ago was approximately \$2 million. Please also see the Company's response to AWEC-DR-072, where all invoices were provided for the most recent Avistautilitties.com Redesign completed in 2017.

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 08/27/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Jim Kensok                     |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 090            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Refer to page 86 of Exhibit Avista/602 in Oregon Public Utility Commission Docket No. UG 325.

- a. Based on this document, is it accurate to state that the originally estimated cost for the AvistaUtilities.com Redesign was \$1.5 million? Please confirm or clarify.
- b. Please explain the primary drivers for the increase in cost for the AvistaUtilities.com Redesign from the originally estimated amount to the final cost and provide all supporting documents.

**RESPONSE:**

- a. This was an early “very rough order of magnitude” (VROM) estimate based on limited scope. Once the scope was more fully designed and all components of the project were determined, the cost was re-forecasted.
- b. The redevelopment of AU.com was undertaken in response to industry benchmarking standards, such as Gartner, E-Source, and JD Power and focuses on the improvement of self-service transaction functionality, making the site easier for customers to be able to find what they are looking for quickly and easily, and improving the overall customer experience according to web best practices that are commonly understood across industry. Currently, the AU.com website serves 69% of customer contacts. Through their actions, customers were indicating a clear preference for self-service.

Additionally, direct customer feedback regarding online experience was utilized, from both verbatim comments in our Voice of the Customer quarterly survey, as well as online metrics and feedback, such as Foresee. For example, about 17% of Avista’s customers are not able to complete their transaction online and have to turn to not only a higher cost channel, such as IVR (“Interactive Voice Response”), email, or talking with a CSR (“Customer Service Representative”), which also happens to be their less preferred channel, as their original attempt to self-serve was not successful. AU.com as it exists today was originally launched in January 2008, and has outlived its useful life from a technology standpoint.

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

|               |                       |                |                            |
|---------------|-----------------------|----------------|----------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/06/2019                 |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews          |
| REQUESTER:    | AWEC                  | RESPONDER:     | Liz Andrews                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs         |
| REQUEST NO.:  | AWEC - 099            | TELEPHONE:     | (509) 495-8601             |
|               | Supplemental          | EMAIL:         | liz.andrews@avistacorp.com |

**REQUEST:**

Please provide all utility industry benchmark studies and reports available to Avista from 2014 to present relating to:

- a. Budgeting;
- b. Spending;
- c. Utility performance;
- d. Staffing;
- e. Compensation;
- f. Benefits;
- g. Capital investment;
- h. Information technology;
- i. Information security; or
- j. Customer service.

**RESPONSE:**

Please see the Company's response in AWEC-DR-099C for the requested information. AWEC-DR-099C is **CONFIDENTIAL SUBJECT TO GENERAL PROTECTIVE ORDER**.

The Company may review various industry benchmark studies or reports throughout the year from various sources that may or may not include information about Avista, but rather the utility industry at large. The Company, however, does not retain all studies it may have reviewed. Information provided below relate to studies prepared specifically for Avista, or industry surveys in its possession. Avista may further supplement this information after further review of its files.

- a. Budgeting: Avista has not engaged in a budgeting utility industry comparative benchmark study during the timeframe specified.
- b. Spending: Avista has not engaged in a spending utility industry comparative benchmark study during the timeframe specified.
- c. Utility performance: see the following attachments:
  - i. AWEC-DR-099 Attachment A - WUTC Reliability Benchmarking Study
  - ii. AWEC-DR-099 Attachment B - Fleet 2018 Avista Executive Summary
- d. Staffing: Please see the following:

- i. Company's response to Staff\_DR\_009C Confidential Attachments A through E for copies of the Executive Total Compensation Benchmarking for 2004 – 2018.
  - ii. Folder: Staff\_DR\_099C Confidential Attachment C for salary surveys. In addition to these benchmark surveys, each department carefully considers a number of factors such as breadth and depth of knowledge, changes in responsibility, and changes in work load (among other things) as the basis for annual salary increases.
- e. Compensation: Other than base salary, addressed in part (d) above, the majority of all other compensation components are addressed in the context of "Benefits". See the Company's response to Staff\_DR\_041C for a full description of Company benefits.
- f. Benefits: Please see AWEC\_DR\_099C Confidential Attachment D for the BENEVAL study for Avista Corporation performed by Willis Towers Watson.
- g. Capital investment: see the following attachments:
- i. AWEC-DR-099-Attachment L - Capital Expenditures
  - ii. AWEC-DR-099-Attachment M - Electric Industry Update
- h. Information technology: Avista has not engaged in an Information Technology utility industry comparative benchmark study during the timeframe specified.
- i. Information security: Attached as AWEC-DR-099C Confidential Attachment N - Information Security, is a presentation provided to the Avista Board of Directors in 2016. This is not an industry benchmark study, however, it represents survey data from several utilities for security budget comparisons. The survey itself is not available, as it was an informal survey by EEL.
- j. Customer service: Please see the following:
- i. AWEC-DR-099 Attachment E - Pricing Overview- Budget Planning
  - ii. AWEC-DR-099 Attachment F - Caller Identification IVR
  - iii. AWEC-DR-099 Attachment G - DataSource Survey Results
  - iv. AWEC-DR-099 Attachment H - IVR Messaging and Call Flow
  - v. AWEC-DR-099 Attachment I – ReportingValue
  - vi. AWEC-DR-099 Attachment J - SAP Accounting Systems - Compiled Responses
  - vii. AWEC-DR-099 Attachment K - SONP Protection for Medical Equipment and Medical Emergencies

#### **SUPPLEMENTAL RESPONSE 09.06.2019**

See the following confidential attached additional benchmark or survey data available to the Company:

- h. Information technology – (See AWEC-DR-090 – reference “The redevelopment of AU.com was undertaken in response to industry benchmarking standards, such as Gartner, E-Source, and JD Power) –
- Gartner studies considered early on for this project (2013-2015) were not retained.
  - E-Source – E-Source website review usability ranking, see AWEC-DR-099C Supplemental Confidential Attachment O – Avista 2014 EUR Presentation
  - JD Power – 2013 JDP Executive summary for website rankings - see AWEC-DR-099C Supplemental Confidential Attachment P – 2013 JDP Website Satisfaction 2013.pdf and AWEC-DR-099C Supplemental Confidential Attachment Q - 2013\_UWES\_Exec\_Summ.pdf



- JDP 2014 electric residential customer satisfaction survey (not specific to web, relates to aspects of website use) – see AWEC-DR-099C Supplemental Confidential Attachment R - 2015 E Source Website Review.pdf

h. Information Technology – Recent Gartner survey “Survey Analysis: Organizations need to Improve Customer Experience to Fully Exploit Digital Commerce” – see AWEC-DR-099C Supplemental – Confidential Attachment Y - RatecaseWASurvey\_analysis\_organization\_369517

c. Utility performance: The following information is in response to 2018 AGA benchmarking review available to the Company. Please note, the following studies include identification of Avista only, other companies are not identified within the reports to preserve the AGA confidential process.

- AWEC-DR-099C Supplemental - Attachment S - D. Meyer Request - Provision of AGA Survey Results – contains an email request from Mr. David Meyer, Avista Vice President and Chief Counsel for Regulatory and Governmental Affairs to AGA (Mr. Murray) for permission to disclose AGA survey results.
- AWEC-DR-099C Supplemental - Attachment T - AGA 2019 09 03 Response – contains the letter of approval from AGA General Counsel Mr. Murray for surveys provided as:
  - AWEC-DR-099C Supplemental - Confidential Attachment U - Collection and maint of as built Charts 7\_30\_19
  - AWEC-DR-099C Supplemental - Confidential Attachment V - DIMP Charts 5\_7\_19
  - AWEC-DR-099C Supplemental - Confidential Attachment W - OQ and Training charts 5\_7\_19
  - AWEC-DR-099C Supplemental - Confidential Attachment X - System Reliability Charts 5\_23\_19

Please note that Avista is identified as “AJ” in Confidential Attachments U-X.

Pages 25 – 32 of Exhibit LDK-3C have been designated confidential per the protective order in Dockets UE-190334, UG-190335, and UE-190222 and have been redacted in their entirety.

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/10/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | James Kensok                   |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 141            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Please identify the number of unique visits Avista has received to myavista.com annually since its deployment.

**RESPONSE:**

Myavista.com went live in June, 2017. Annual visits for 2017 includes the total visits for avistautilities.com (prior to myavista.com go live), plus visits to myavista.com.

Total unique web visits:

2017 - 3,466,919

2018 - 3,770,243

2019 - 2,484,795 (Jan. 1, 2019 through Jul. 31, 2019).

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/20/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Heather Rosentrater            |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephen Schulte                |
| TYPE:         | Data Request          | DEPT:          | Joint Use                      |
| REQUEST NO.:  | AWEC - 144            | TELEPHONE:     | (509) 495-2548                 |
|               |                       | EMAIL:         | Stephen.schulte@avistacorp.com |

**REQUEST:**

Please refer to response to AWEC DR 40c.

- a. Please provide the rate Avista charges for pole attachments with supporting workpapers.
- b. Please identify the number of poles that Avista expects to receive new 5G related pole attachments in 2019 and 2020.
- c. Please identify each entity that Avista is contemplating providing 5G pole attachments to.
- d. Please identify the number of poles Avista owns in Washington.
- e. Please provide all Avista emails regarding 5G cellular deployment.

**RESPONSE:**

- a. See AWEC-DR-144 Attachments A-D for rate sheets that include wireline and wireless yearly fees.
- b. Avista currently has 163 approved applications for 'small cell wireless' attachments with none installed or activated at the time of this request. Additionally Avista has no insight as to the technology being deployed by the carriers (4G, 5G, LTE, CBRS etc.). Avista permits the attachment of the equipment only, the specific utilization of the equipment would need to be answered by the carrier.
- c. Avista currently has agreements with Verizon, AT&T, Mobilitie, and Extenet for the attachment of 'small cell wireless' equipment. Avista has no knowledge of any other providers requesting access at this time.
- d. Avista currently owns and maintains roughly 156,400 poles in the State of Washington.
- e. Since, as mentioned previously, Avista does not determine the specific use of the small cell wireless equipment (4G, 5G, LTE, CBRS etc.), Avista would have no specific knowledge of nor would it receive emails regarding 5G vs. 4G deployment. Emails between the parties are in the form of attachment requests to available utility poles.

10/2/2018 10:15 AM

RATES MID POLE WIRELESS 2018 WIRELESS WA

**EXHIBIT B**  
**Computation of Rate per Attachment on Poles for**  
**Antenna Attachments**  
**on Avista Utilities poles**  
**In the State of Washington**  
**for contact year 2018**

| ITEM                                      | DESCRIPTION                                  | SOURCE    | WASHINGTON    |          |                |
|---|--|-----------|---------------|----------|----------------|
|   |  |           | AMOUNT        | SUBTOTAL | TOTAL          |
| <b>USABLE SPACE FACTOR</b>                |  |           |               |          |                |
| A   | SPACE OCCUPIED BY ATTACHMENT                 | FCC       | 4             |          |                |
| B   | TOTAL USABLE SPACE                           | UTC       | 13.5          |          |                |
| C   | USABLE SPACE FACTOR                          |           |               |          | 0.296          |
| <b>DEPRECIATION EXPENSE</b>               |  |           |               |          |                |
| D   | DEPRECIATION CARRYING CHARGE                 | DATA(AA)  | 1.7325%       |          |                |
| E   | GROSS TO NET INVESTMENT RATIO                | DATA(AB)  | 1.844         |          |                |
| F   | DEPRECIATION EXPENSE                         | DxE       |               |          | 3.20%          |
| <b>ADMINISTRATIVE AND GENERAL EXPENSE</b> |  |           |               |          |                |
| G   | TOTAL APPLICABLE A&G                         | DATA(Z)   | 71,967,905    |          |                |
| H   | NET APPLICABLE PLANT                         | DATA(V)   | 2,285,083,292 |          |                |
| I   | ADMIN CARRYING CHARGE                        | G/H       |               |          | 3.15%          |
| <b>MAINTENANCE EXPENSE</b>                |  |           |               |          |                |
| J   | TOTAL APPLICABLE MAINTENANCE                 | DATA(AJ)  | 6,111,733     |          |                |
| K   | NET DIST PLANT IN STATE                      | DATA(Y)   | 279,928,399   |          |                |
| L   | MAINT CARRYING CHARGE                        | J/K       |               |          | 2.18%          |
| <b>NORMALIZED TAXES</b>                   |  |           |               |          |                |
| M   | TOTAL ALLOCATED TAXES                        | DATA(AI)  | 134,716,894   |          |                |
| N   | NET ELECTRIC PLANT                           | DATA(V)   | 2,285,083,292 |          |                |
| O   | TAX CARRYING CHARGE                          | M/N       |               |          | 5.90%          |
| <b>RATE OF RETURN</b>                     |  |           |               |          |                |
| P   | ROR CARRYING CHARGE                          | UTC       |               |          | 7.32%          |
| Q   | TOTAL CARRYING CHARGE                        | D+I+L+O+P |               |          | 21.74%         |
| <b>NET INVESTMENT PER BARE POLE</b>       |  |           |               |          |                |
| R   | NET INVESTMENT IN POLES                      | DATA(X)   | 133,582,772   |          |                |
| S   | RATIO FOR BARE POLE                          | FCC       | 0.85          |          |                |
| T   | NUMBER OF POLES                              | DATA(AK)  | 159,000       |          |                |
| U   | NET INVESTMENT PER BARE POLE                 | R*S/T     |               |          | 714.12         |
| V   | 2018 CALCULATED RATE PER POLE ATTACHMENT     | C*Q*U     |               |          | \$46.01        |
| W   | <b>2018 BILLING RATE PER POLE ATTACHMENT</b> |           |               |          | <b>\$46.01</b> |

Source of Data is FERC Form 1 dated 12/31/17

Prepared By: \_\_\_\_\_  
Title: Joint Use Administrator  
Date: September 28, 2018

10/2/2018 10:15 AM

RATES MID POLE WIRELESS 2018 WIRELESS ID

**EXHIBIT B**  
**Computation of Rate per Attachment for**  
**Antenna Attachments**  
**on Avista Utilities poles**  
**In the State of Idaho**  
**for contact year 2018**

| ITEM                                      | DESCRIPTION                                  | SOURCE    | IDAHO         |          |                |
|---|--|-----------|---------------|----------|----------------|
|   |  |           | AMOUNT        | SUBTOTAL | TOTAL          |
| <b>USABLE SPACE FACTOR</b>                |  |           |               |          |                |
| A   | SPACE OCCUPIED BY ATTACHMENT                 | FCC       | 4             |          |                |
| B   | TOTAL USABLE SPACE                           | UTC       | 12.0          |          |                |
| C   | USABLE SPACE FACTOR                          |           |               |          | 0.333          |
| <b>DEPRECIATION EXPENSE</b>               |  |           |               |          |                |
| D   | DEPRECIATION CARRYING CHARGE                 | DATA(AA)  | 1.7325%       |          |                |
| E   | GROSS TO NET INVESTMENT RATIO                | DATA(AB)  | 1.844         |          |                |
| F   | DEPRECIATION EXPENSE                         | DxE       |               | 3.20%    |                |
| <b>ADMINISTRATIVE AND GENERAL EXPENSE</b> |  |           |               |          |                |
| G   | TOTAL APPLICABLE A&G                         | DATA(Z)   | 71,967,905    |          |                |
| H   | NET APPLICABLE PLANT                         | DATA(V)   | 2,285,083,292 |          |                |
| I   | ADMIN CARRYING CHARGE                        | G/H       |               | 3.15%    |                |
| <b>MAINTENANCE EXPENSE</b>                |  |           |               |          |                |
| J   | TOTAL APPLICABLE MAINTENANCE                 | DATA(AJ)  | 3,205,733     |          |                |
| K   | NET DIST PLANT IN STATE                      | DATA(Y)   | 154,651,631   |          |                |
| L   | MAINT CARRYING CHARGE                        | J/K       |               | 2.07%    |                |
| <b>NORMALIZED TAXES</b>                   |  |           |               |          |                |
| M   | TOTAL ALLOCATED TAXES                        | DATA(AI)  | 134,716,894   |          |                |
| N   | NET ELECTRIC PLANT                           | DATA(V)   | 2,285,083,292 |          |                |
| O   | TAX CARRYING CHARGE                          | M/N       |               | 5.90%    |                |
| <b>RATE OF RETURN</b>                     |  |           |               |          |                |
| P   | ROR CARRYING CHARGE                          | UTC       |               | 7.91%    |                |
| Q   | TOTAL CARRYING CHARGE                        | D+I+L+O+P |               |          | 22.22%         |
| <b>NET INVESTMENT PER BARE POLE</b>       |  |           |               |          |                |
| R   | NET INVESTMENT IN POLES                      | DATA(X)   | 73,502,474    |          |                |
| S   | RATIO FOR BARE POLE                          | FCC       | 0.85          |          |                |
| T   | NUMBER OF POLES                              | DATA(AK)  | 81,600        |          |                |
| U   | NET INVESTMENT PER BARE POLE                 | R*S/T     |               |          | 765.65         |
| V   | 2018 CALCULATED RATE PER POLE ATTACHMENT     | C*Q*U     |               |          | \$56.72        |
| <b>W</b>                                  | <b>2018 BILLING RATE PER POLE ATTACHMENT</b> |           |               |          | <b>\$56.72</b> |

Source of Data is FERC Form 1 dated 12/31/17

Prepared By: \_\_\_\_\_  
Title: Joint Use Administrator  
Date: September 28, 2018

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

|               |                       |                |                               |
|---------------|-----------------------|----------------|-------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/26/2019                    |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews             |
| REQUESTER:    | AWEC                  | RESPONDER:     | Jennifer S. Smith             |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs            |
| REQUEST NO.:  | AWEC - 148            | TELEPHONE:     | (509) 495-2098                |
|               |                       | EMAIL:         | Jennifer.smith@avistacorp.com |

**REQUEST:**

For each Avista affiliate and non-utility operation, indicate whether the affiliate uses any of the following Avista assets or services and identify the associated dollars directly assigned or allocated to the operations:

- a. Accounting software or labor;
- b. IT hardware;
- c. Office space;
- d. Human resource software or labor;
- e. Legal services; or
- f. Other Avista assets or services.

**RESPONSE:**

Where Avista assets have been used in association with an affiliate or non-utility operation, the company removes a portion of the office space costs (including, but not limited to office building operating and fixed costs, utilities, administrative, security, HVAC, depreciation and property taxes, as well as other costs related to employee use of phones, laptops, etc.) from utility to non-utility.

As noted in the Affiliate Interest and Subsidiary Transaction Reports provided in response to AWEC\_DR\_146, on a regular basis, general office employees of Avista Corporation spend time on corporate service support, such as accounting, federal income tax filing, planning, supplies, postage, legal, graphic services, etc. for subsidiaries. Their time is charged to suspense accounts (Deferred Debit Account No. 186), are loaded for benefits, and then established as a receivable (FERC Account No. 146) when billed to the subsidiary. If other resources are expended during the course of this work, such as travel or consulting services, these costs are also charged to suspense accounts and billed to the subsidiary. All corporate services provided, and costs incurred, are direct billed to subsidiaries at cost. No additional margin or profit is included and no assets are allocated. Suspense and capture of Avista Corporation employee costs, which are then billed back to the subsidiary at cost, serve to reduce the utility expenses.

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

|               |                       |                |                               |
|---------------|-----------------------|----------------|-------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/26/2019                    |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews             |
| REQUESTER:    | AWEC                  | RESPONDER:     | Jennifer S. Smith             |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs            |
| REQUEST NO.:  | AWEC - 149            | TELEPHONE:     | (509) 495-2098                |
|               |                       | EMAIL:         | Jennifer.smith@avistacorp.com |

**REQUEST:**

Please identify all new affiliate or non-utility initiatives, projects, or other investments that Avista has invested in since January 1, 2017 or is considering investing in in 2019 or 2020. For each item, please provide presentations made to the Avista board of directors, identify the amount invested or expected to be invested, and identify all corporate cost that Avista assigns or allocates to the project.

**RESPONSE:**

Please see Avista's **CONFIDENTIAL** response to data request Staff-DR-149C. Please note that Avista's response to Staff-DR-149C is **Confidential per Protective Order in UTC Dockets UE-190222, UE-190334 and UG-190335**.

Please see the response to AWEC-DR-146 for the Affiliate Interest and Subsidiary Transaction Reports for the 2018 calendar year, and AWEC-DR-149, Attachment A-B for the Affiliate Interest and Subsidiary Transaction Reports for the 2017 calendar year (AWEC-DR-149C Confidential Attachments A & B). Information for the 2019 and 2020 Affiliate Interest and Subsidiary Transaction Report has not yet been prepared and is not readily available.

For presentations made to Avista board of directors related to subsidiary and affiliate information, please see AWEC-DR-149C Confidential Attachment C & D.

The following table provides the new affiliate or non-utility investments Avista Development has made since January 1, 2017, and an estimate of forward obligations relating to those investments. Those portions of presentations made to the Avista Board of Directors regarding these investments are provided in AWEC-DR-149C Confidential Attachments C & D, with selected redaction for investments not pursued, financial data which is not responsive to the request, or for third parties in ongoing discussion but without contracted relationships.

Also, please note, corporate costs are allocated to these activities as described in response to AWEC-DR-148.



|                                     | Invested since<br>Jan 1, 2017 | Add'l Future<br>expected |
|-------------------------------------|-------------------------------|--------------------------|
| ConnectDER, LLC                     | 0.6                           | 1.0                      |
| Energy Impact Partners I            | 16.7                          | 7.0                      |
| Energy Impact Partners II           | 0.0                           | 25.0                     |
| Innovate Washington (loan)          | 1.3                           | 1.4                      |
| Kick Start III, LLC                 | 0.3                           | 0.0                      |
| LevelTen Energy, Inc.               | 1.0                           | 0.0                      |
| Lumen BioScience, Inc.              | 5.3                           | 0.0                      |
| Mind to Market, LLC                 | 0.3                           | 0.0                      |
| Omnidian, Inc.                      | 1.8                           | 0.0                      |
| Open Energy Solutions Inc.          | 1.5                           | 0.0                      |
| Perpetua, Inc                       | 0.1                           | 0.0                      |
| Plum Energy                         | 0.2                           | 0.0                      |
| Porch.com                           | 1.0                           | 0.0                      |
| Rathdrum 84 acres for Salix LNG     | 0.6                           | 0.0                      |
| Safeguard Equipment, Inc.           | 0.6                           | 0.0                      |
| South Universtity District entities | 13.2                          | 16.3                     |
| Spirae, LLC                         | 2.5                           | 0.0                      |
| Trove                               | 2.4                           | 0.0                      |
| Xpansiv Data Systems Inc.           | 1.0                           | 0.0                      |

\$ in Millions

Future expected items are estimates subject to change

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/20/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews              |
| REQUESTER:    | AWEC                  | RESPONDER:     | Annette Brandon                |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs             |
| REQUEST NO.:  | AWEC – 150            | TELEPHONE:     | (509) 495-4324                 |
|               |                       | EMAIL:         | Annette.brandon@avistacorp.com |

**REQUEST:**

Please provide records of officer time, as used to assign labor costs, for May 11, 2018, August 14, 2018, and August 9, 2010

**RESPONSE:**

Please see Avista's **CONFIDENTIAL** response to data request Staff-DR-150C. Please note that attachments included in Avista's response to Staff-DR-150C is **Confidential per Protective Order in UTC Dockets UE-190334 and UG-190335**.

Executive base pay is allocated between utility and non-utility operations based on estimates developed at the start of the year. These allocations are used when entering hours bi-weekly into the timekeeping system. Each officer considers a number of factors when developing their individual allocation percentage. Current and past job responsibilities, including board meetings, anticipated changes due to projects specific to the upcoming year(s), anticipated responsibility changes and/or overall upcoming strategic initiatives and associated roles are all taken into consideration when developing these allocations. Throughout the year, these allocations are reviewed and updates are made in the timekeeping system such that actual time for the entire year are accurately reflected. As a result, individual days may or may not be representative of actual workload on each respective year.

However, in order to be responsive to this data request, attached please find AWEC-DR-150C Confidential Attachment A for timecard information on the days requested.

Please see the Company's response to Staff\_DR\_008 for annual officer base salary expense for 2018 and 2019.

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

|               |                       |                |                               |
|---------------|-----------------------|----------------|-------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/26/2019                    |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | Elizabeth Andrews             |
| REQUESTER:    | AWEC                  | RESPONDER:     | Jennifer S. Smith             |
| TYPE:         | Data Request          | DEPT:          | Regulatory Affairs            |
| REQUEST NO.:  | AWEC - 154            | TELEPHONE:     | (509) 495-2098                |
|               |                       | EMAIL:         | Jennifer.smith@avistacorp.com |

**REQUEST:**

Please provide all operating agreements between Avista and South Landing Investors related to Catalyst.

**RESPONSE:**

Please see the Company's response in AWEC-DR-154C for the requested information. AWEC-DR-154C is **CONFIDENTIAL SUBJECT TO GENERAL PROTECTIVE ORDER**.

Please see AWEC-DR-154C Confidential Attachment A, for a copy of an agreement between Avista Corporation (doing business as Avista Utilities) and Spokane Eco District 1, LLC, for a copy of the Electric Service Agreement (Schedule 21) for electric service to the Catalyst Building. Additionally, please see response to AWEC-DR-156. There are no other agreements between Avista Corporation and South Landing Investors.

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

|               |                       |                |                                |
|---------------|-----------------------|----------------|--------------------------------|
| JURISDICTION: | WASHINGTON            | DATE PREPARED: | 09/24/2019                     |
| CASE NO.:     | UE-190334 & UG-190335 | WITNESS:       | James Kensok                   |
| REQUESTER:    | AWEC                  | RESPONDER:     | Stephanie Myers                |
| TYPE:         | Data Request          | DEPT:          | Customer Solutions             |
| REQUEST NO.:  | AWEC - 161            | TELEPHONE:     | (509) 495-4620                 |
|               |                       | EMAIL:         | Stephanie.myers@avistacorp.com |

**REQUEST:**

Please refer to the response to AWEC DR 73. Please identify the winning bidders for the referenced RFPs and provide the relevant contracts.

**RESPONSE:**

Please see the Company's response in AWEC-DR-161C for the requested information. AWEC-DR-161C is **CONFIDENTIAL SUBJECT TO GENERAL PROTECTIVE ORDER**.

Re: Avista Utilites.Com Redesign Project:

**Phase 0 – Design Blueprint**

This phase was awarded to IBM. The IBM contract is attached as AWEC-DR-161C Confidential Attachment A.

**Phase 1 – Implementation of MyAvista.com**

This phase was awarded to ConnectiveDX for design and front-end development. Back-end development was performed by internal Avista resources. The ConnectiveDX contracts are attached as AWEC-DR-161C Confidential Attachment B.

Pages 43-47 of Exhibit LDK-3C have been designated confidential per the protective order in Dockets UE-190334, UG-190335, and UE-190222 and have been redacted in their entirety.