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July 16, 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:

Enclosed please find Public Counsel's response to Bench Request No. 4, including a revised final issues matrix and an explanation, provided below, of updates to Andrea Crane's revenue requirement models. Andrea Crane's revised models accompany this letter in excel and pdf format for 2nd Revised Exhibits ACC-3r2 through ACC-8r2. Exhibits ACC-3r2 and ACC-4r2 originate from the excel file "Crane 2020 Schedules Electric UPDATED FOR REBUTTAL.xlsx" and Exhibits ACC-6r2 and ACC-7r2 originate from the excel file "Crane 2020 Schedules Gas UPDATED FOR REBUTTAL.xlsx"; Exhibits ACC-5r2 and ACC-8r2 have their own individual excel files that they originate from.

See the list below for explanations of revisions to Andrea Crane's exhibits:

Electric:

- 2.04** Regulatory Expense – Reflects Avista Rebuttal update
- 3.01** Pro Forma Revenue Normalization – Reflects Avista Rebuttal update
- 3.07** Pro Forma Insurance Expense – Reflects Avista Rebuttal update for Directors and Officers Insurance but still includes Public Counsel's recommendation to disallow 50% of D&O insurance.
- 3.09** Pro Forma Property Tax – Reflects Avista Rebuttal update
- 3.18** Pro Forma EIM Expenditure – Reflects multi-party settlement at Public Counsel's recommended return on equity
- 3.2** Pro Forma Normalize CS2/Colstrip Major Maintenance – Reflects Avista Rebuttal Update

Received  
Records Management  
07/16/21 13:58  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

To: Mark L. Johnson, WUTC  
RE: Dockets UE-200900 and UG-200901 (*Consolidated*)  
July 16, 2021  
Page 2 of 2

Gas:

- 2.04** Regulatory Expense – Reflects Avista Rebuttal update
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- 3.09** Pro Forma Property Tax – Reflects Avista Rebuttal update

Sincerely,

/s/ 

NINA SUETAKE, WSBA NO. 53574  
Assistant Attorney General  
Public Counsel  
(206) 389-2055

NMS/KMB

Enclosures

cc: Service List (E-mail)

**CERTIFICATE OF SERVICE**

**DOCKET UE-200900 & UG-200901 (Consolidated)  
WUTC v. Avista Corp. (2020 General Rate Case)**

**I HEREBY CERTIFY** that I have this day served *Response to Bench Request No. 4 on behalf of Public Counsel* upon all parties of record in this proceeding, by electronic transmission to the email address(es) or by mailing a true and correct copy, postage prepaid, to each party or party representative listed in the Commission's master service list for this docket.

HC = Receives Highly Confidential; C = Receives Confidential; NC = Receives Non-Confidential

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Dated at Seattle, Washington this 16th day of July, 2021.

/s/   
KEVIN BURDET  
Legal Assistant  
Public Counsel Unit