

**ALLIANCE OF WESTERN ENERGY CONSUMERS'
RESPONSE TO BENCH REQUEST**

JURISDICTION:	WASHINGTON	DATE PREPARED:	July 27, 2021
CASE NO:	UE-200900-901-894	RESPONDER:	Legal Counsel
REQUESTER:	Bench	TELEPHONE:	503-241-7242
TYPE:	Bench Request	EMAIL:	blc@dvclaw.com
REQUEST NO.:	Bench Request No. 11		

BENCH REQUEST NO. 11:

In the Settlement, the Settling Parties “agree to include EIM capital and expenses in case rates as proposed by Avista.”^{1/}

- a) Avista witness Andrews’ testimony, Exh. EMA-1T at 28:14-16 and Exh. EMA-6T at 15:1-14, states that portions of the 3.17, 3.18, and 3.19 pro forma adjustments are provisional and related to projects that are estimated to be in service after the rate effective date.

In Avista’s revised response to BR-1, “200900-01-894-AVA-RevisedBR1-Att-A-06-18-2021,” spreadsheet “ADJ DETAIL-INPUT,” columns AX and AY, Avista’s electric revenue requirement model identifies and separately states the traditional and provisional portions of pro forma adjustment 3.18. Please simply confirm that the provisional portion of pro forma adjustment 3.18 identified in Avista’s response to BR-1 is the correct understanding of the Settling Parties.

- b) Avista witness Andrews’s testimony, Exh. EMA-1T at 29:16-23, outlines the review process for the provisional portion of the pro forma adjustments, including pro forma adjustment 3.18.
- (i) Please confirm whether the Settling Parties agree to the review process outlined in Andrews’s testimony identified in (b), above, for the provisional portion of pro forma adjustment 3.18 and indicate whether the Settling Parties agree or expect a prudence determination to occur immediately after completion or in Avista’s next GRC.
 - (ii) Would that review process for the provisional portion of pro forma adjustment 3.18 agreed by the Settling Parties in the Settlement also apply to other provisional adjustments if the Commission approves any other provisional adjustments?
 - (iii) Please provide a non-binding estimate of when the Company expects it might file its next GRC. If the Company’s next GRC is filed more than a year after the effective date of this case, will Avista provide an annual report on any provisional pro forma adjustments approved by the Commission consistent with the Used and Useful Policy Statement?

^{1/} Settlement at 4, ¶ 10.

AWEC RESPONSE TO BENCH REQUEST 11:

- a) Similar to Staff's response, provided July 27, 2021, AWEC has not conducted discovery on or otherwise verified Avista's Response to Bench Request No. 1.

- b) (i) AWEC agrees with Staff's Response to Bench Request No. 11(b)(i), stating that the review process was not included within the Settlement Agreement and that any decision regarding a review process is at the discretion of the Commission. AWEC also concurs with Staff's preference that any review be approved to occur in Avista's next general rate case rather than in an additional review proceeding.

(ii) AWEC further agrees with Staff's Response to Bench Request No. 11(b)(ii). AWEC did not agree to a particular review process for adjustment 3.18 in the Settlement Agreement and did not contemplate nor include "provisional" adjustments to the revenue requirement. AWEC likewise takes no position on the EIM review process, or on any review process for any "provisional" adjustment(s). AWEC further supports Staff's understanding that "provisional" refers only to portions of the pro forma adjustment that will be in service after the rate effective date, and AWEC prefers any review of such adjustments occur in Avista's next general rate case rather than in an additional review proceeding.