

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION)	
)	
Complainant,)	DOCKET NO. UE-070804
)	and
v.)	DOCKET NO. UG-070805
)	(consolidated)
)	
AVISTA CORPORATION d/b/a AVISTA)	
UTILITIES)	
)	
Respondent.)	
_____)	
In the Matter of the Petition of)	
)	
AVISTA CORPORATION d/b/a AVISTA)	DOCKET NO. UE-070311
UTILITIES,)	
)	
For an Accounting Order Regarding the)	
Appropriate Treatment of the Net Costs)	
Associated With the Repurchase of Debt)	
_____)	

EXHIBIT NO.____(DWS-4)
AVISTA RESPONSE TO
STAFF DATA REQUEST NO. 396

October 17, 2007

AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION:	Washington	DATE PREPARED:	10/01/2007
CASE NO:	UE-070804 & UG-070805	WITNESS:	Kelly Norwood
REQUESTER:	WUTC Staff	RESPONDER:	Liz. M. Andrews
TYPE:	Data Request	DEPT:	State & Federal Regulation
REQUEST NO.:	Staff – 396	TELEPHONE:	(509) 495-8601

REQUEST:

Please provide any studies, analyses, and evaluations performed by the Company to determine the degree of complexity, difficulty, and other challenges of a PCORC filing in terms of:

- a. huge quantity of cost details to review;
- b. amount of supporting testimonies, exhibits, workpapers, and other required documents to be filed and analyzed;
- c. time constraints associated with filing of updates by the company with more recent data than what was initially filed;
- d. available time for prudence review of resources proposed for recovery; and
- e. available time for preparation of response testimonies by interested parties.

RESPONSE:

In formulating this response, the company has had the opportunity to observe, through the actual operation of Puget Sound Energy's PCORC, the efficiencies and timelines implemented by the Commission.

- a. Because the issues in the PCORC are limited in scope and only reflect updates to production and transmission items, this should serve to streamline the scope of the review.
- b. The supporting testimonies, exhibits, workpapers, and other required documents to be filed and analyzed for a PCORC process will be limited in scope and only reflect updates to production and transmission items.
- c. The Company does not anticipate, absent extraordinary circumstances, the need to include updates to the filed data during the pending PCORC proceeding. If during the pending PCORC proceeding it is determined updates to the filed data are necessary, the Company would provide Staff and other parties with adequate time to respond to the request, and additional time to the procedural schedule should be considered.
- d. Avista anticipates the time for a prudence review of resources proposed for recovery would correspond with PSE's PCORC, and as described within Docket No. UE-011570, in the Twelfth Supplemental Order, which established PSE's Power Cost Only Rate Review. See Exhibit A to Settlement Stipulation in that proceeding, page 6 item C11: "it is contemplated that this review would be completed within four months. Within 30 days following the four month review, the Commission would issue an order determining the appropriateness of all power costs to be included in the Power Cost Rate and the prudence of any new resource...".
- e. The procedural schedule would be set by the Administrative Law Judge at a Pre-hearing Conference and would include time for response testimony by all parties.