

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a AVISTA UTILITIES,

Respondent.

DOCKET NOS. UE-200900 and UG-200901 (*Consolidated*)

PAUL J. ALVAREZ AND DENNIS STEPHENS
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT

EXHIBIT PADS-18

Avista Response to Public Counsel Data Request No. 172

April 21, 2021

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	02/14/2021
CASE NO.:	UE-200900 & UG-200901	WITNESS:	Heather Rosentrater
REQUESTER:	Public Counsel	RESPONDER:	John Gross
TYPE:	Data Request	DEPT:	System Planning
REQUEST NO.:	PC – 172	TELEPHONE:	(509) 495-4591
		EMAIL:	john.gross@avistacorp.com

SUBJECT: Major Maintenance (Electric)

REQUEST:

Please refer to Heather L. Rosentrater, Exhibit HLR-11, at 295, regarding the discussion of “Alternatives considered”.

- a) Provide list of all “obsolete” and “end-of-life apparatus”.
- b) Provide the criteria Avista uses to classify each apparatus as “obsolete”.
- c) Provide the criteria Avista uses to classify each apparatus as “end-of-life”.
- d) Provide evidence that each apparatus classified as “obsolete” cannot be obtained from any manufacturer.
- e) The statement “Extension of distribution feeders from neighboring substations and increased capacity at those substations would be required at a minimum” implies that load forecast or other studies have identified insufficient capacity on the system “neighboring substations.” Provide the forecasts and or other studies which shows this lack of system capacity through 2025.
- f) Provide the studies calculations that Avista performed which would show the “Increased liability” that “would result” from a lack of this program.

RESPONSE:

- a) Please see the Company’s response to PC-DR-100 parts (d).
- b) Please see the Company’s response to PC-DR-100 parts (c).
- c) Avista uses a range of typical approaches for determining the end of life of assets, including asset condition based on general and infrared inspections, as described in response to PC-DR-100 part (b), age, obsolescence and lifecycle costs.
- d) The fact that an apparatus may be available for purchase, does not obviate the practical need to make asset decisions in the aggregate that allow us to run an efficient, reliable and cost-effective operation.
- e) The statement implies nothing about any condition of “insufficient capacity on the system.” It simply refers to the fact that if a neighboring substation is tapped to pick up new load, that is, “new load that was not previously in the load forecast for that substation and its feeders,” then the capacity at the neighboring station may be insufficient, and regardless, will have to undergo capacity increases earlier in time than was initially forecast. The Company looks for opportunities to tap available capacity from substations, such as those that may have lost a large historic load, to supply feeders from adjacent stations, through the segment reconductor and feeder tie program.

- f) The statement simply means that if the Company does not prudently plan for the timely investments in the infrastructure it needs to serve its customers, it will ultimately be held responsible for the consequences of such action or inaction.