

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a AVISTA UTILITIES,

Respondent.

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

**SHAY BAUMAN**

**ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT SB-6**

Avista Response to Public Counsel Data Request No. 196

**April 21, 2021**

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	03/01/2021
CASE NO.:	UE-200900 & UG-200901	WITNESS:	Josh DiLuciano
REQUESTER:	Public Counsel	RESPONDER:	Robb Raymond
TYPE:	Data Request	DEPT:	Electrical Engineering
REQUEST NO.:	PC - 196	TELEPHONE:	(509) 495-4695
		EMAIL:	robb.raymond@avistacorp.com

**SUBJECT: AMI**

**REQUEST:**

Please refer to Avista's response to Public Counsel Data Request No. 137, in which Avista provides historical electric and gas spending detail for meter reading (PC-137, subpart (a)) and meter services (PC-137, subpart (d)) departments by year from 2016 through 2020.

- a) Provide 2020 meter reading departmental spending detail by month for both electric and gas.
- b) Provide 2020 meter services departmental spending detail by month for both electric and gas.
- c) Does Avista maintain a separate department for Credit Collections Connections? If so, provide electric and gas spending detail for the Credit Collections Connections department by year from 2016 through 2020.
- d) If Avista maintains a separate department for Credit Collections Connections, provide 2020 electric and gas spending detail by month.
- e) Provide the number of Electric meters read via the AMI system in December, 2019.
- f) Provide the number of Gas meters read via the AMI system in December, 2019.

**RESPONSE:**

a) Please see the table below for meter reading spending detail by month for both electric and natural gas service.

Category	202001	202002	202003	202004	202005	202006	202007	202008	202009	202010	202011	202012	Grand Total
Burden Cost USD	\$82,166	\$68,091	\$72,375	\$89,608	\$373,500	\$51,644	\$19,678	\$15,833	\$18,163	\$34,964	(\$159)	\$47,145	\$873,008
Inventory USD	\$287	\$310	\$319		\$5	\$600		\$21		\$240		\$552	\$2,334
Labor Cost USD	\$98,230	\$98,309	\$86,555	\$75,466	\$187,078	\$80,241	\$56,201	\$99,627	\$32,065	\$51,689	\$37,929	\$38,101	\$941,491
Purchase Invoices	\$2,499	\$3,806	\$1,670	\$3,487	\$1,720	\$774	\$120	\$57			\$217	\$40	\$14,390
Usage Cost USD	\$23,726	\$22,151							\$123		\$34		\$46,034
<b>Grand Total</b>	<b>\$206,907</b>	<b>\$192,667</b>	<b>\$160,920</b>	<b>\$168,562</b>	<b>\$562,302</b>	<b>\$133,259</b>	<b>\$75,999</b>	<b>\$115,537</b>	<b>\$50,351</b>	<b>\$86,893</b>	<b>\$38,022</b>	<b>\$85,838</b>	<b>\$1,877,257</b>

b) Please see the tables below for meter service spending by month in 2020 for electric and natural gas service.

Gas Shop Expenses													Grand Total
Category	202001	202002	202003	202004	202005	202006	202007	202008	202009	202010	202011	202012	Grand Total
Contractor					\$890								\$890
Employee Expenses					\$430	\$92							\$522
Labor	\$470		\$1,112	\$1,693	\$2,080	\$1,064	\$664	\$1,605	\$166				\$8,855
Material	\$10,227	\$263	\$44,871		\$4,083		\$17,577	\$4,074	\$12,858				\$93,953
Vehicle				\$206									\$206
Voucher	\$189	\$149		\$1,298	\$143	\$240	\$2,292		\$456	(\$80,907)	\$394	\$146	(\$75,601)
	<b>\$10,886</b>	<b>\$412</b>	<b>\$45,983</b>	<b>\$3,196</b>	<b>\$7,625</b>	<b>\$1,396</b>	<b>\$20,534</b>	<b>\$5,679</b>	<b>\$13,480</b>	<b>(\$80,907)</b>	<b>\$394</b>	<b>\$146</b>	<b>\$28,825</b>

Electric Shop Expenses													Grand Total
Category	202001	202002	202003	202004	202005	202006	202007	202008	202009	202010	202011	202012	Grand Total
Employee Expenses	\$75	\$183			\$15		\$75				\$92		\$441
Labor	\$50,649	\$52,931	\$47,710	\$30,226	\$48,709	\$39,497	\$53,997	\$50,735	\$51,414	\$92,957	\$66,222	\$59,478	\$644,525
Material										\$392			\$392
Voucher	\$42		\$3,213		\$250	\$47	\$594	\$132	\$360	\$108	\$105		\$4,850
	<b>\$50,766</b>	<b>\$53,114</b>	<b>\$50,924</b>	<b>\$30,226</b>	<b>\$48,975</b>	<b>\$39,543</b>	<b>\$54,666</b>	<b>\$50,867</b>	<b>\$51,774</b>	<b>\$93,457</b>	<b>\$66,419</b>	<b>\$59,478</b>	<b>\$650,208</b>

c) Avista does not maintain a separate department for Credit Collections Connections. The costs are included in meter reading expenses communicated in PC-137 item a) which is included for reference in the table below.

Category	2016	2017	2018	2019	2020
Burden Cost	\$1,657,542	\$1,533,759	\$1,512,192	\$1,435,414	\$873,008
Inventory	\$6,564	\$13,374	\$6,893	\$7,409	\$2,334
Labor Cost	\$1,925,623	\$1,936,009	\$1,982,582	\$1,852,997	\$941,491
Purchase Invoices (Mileage and Incidentals)	\$47,288	\$48,356	\$52,000	\$48,653	\$14,390
Usage Cost (Fleet)	\$542,878	\$461,174	\$469,385	\$425,662	\$46,034
	<b>\$4,179,896</b>	<b>\$3,992,673</b>	<b>\$4,023,052</b>	<b>\$3,770,135</b>	<b>\$1,877,257</b>

d) Avista does not maintain a separate department for Credit Collections Connections and the costs are included in meter reading expenses provided in part (a) above.

e) Avista read 137,478 electric meters by AMI in December 2019.

f) Avista read 81,261 natural gas modules by AMI in December 2019.