

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,	)	DOCKET No. UE-10 _____ DOCKET No. UG-10 _____ )
Complainant,	)	
v.	)	AVISTA CORPORATION'S
AVISTA CORPORATION, d/b/a AVISTA UTILITIES,	)	MOTION FOR A WAIVER OF
Respondent.	)	THE PAPER-FILING REQUIREMENTS OF WAC 480-07-510

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1 COMES NOW, Avista Corporation (hereinafter "Avista" or the "Company"), pursuant to WAC480-07-375, and respectfully moves the Commission for an order waiving the paper-filing requirements of WAC 480-07-510, with respect to certain exhibits identified below. Avista has, however, provided in its general rate case filings, an electronic copy of such exhibits, as otherwise required by WAC 480-07-510, and one paper copy of the exhibits in question, for the official record.

**I.**

2 This Motion is being filed coincident with Avista's general rate case filings in the above-captioned matter, as submitted on March 23, 2010<sup>1</sup>. As is evident from the filing itself, the paper documentation in the form of exhibits is voluminous, comprising some five three-inch binders. (Much of the paper-copy documentation submitted, in exhibit form, consists of, e.g., contracts, documentation and analysis supporting the inclusion in rates of the Lancaster Power Purchase

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<sup>1</sup> In its filing, Avista is requesting an increase in revenue requirements of \$55.3M or 13.4% for electric and \$8.5M or 6.0% for natural gas service.

Agreement<sup>2/3</sup> and additional capacity/deliverability in the Jackson Prairie Storage Project.) (See Exhibits (RJL-3) through (RJL-5), and Exhibit (KJC-2)).

3 In addition, the Company has also compiled extensive documentation, discussed below, in support of a number of proforma capital and expense adjustments. This documentation, in exhibit form, consists of contracts, invoices, timelines, analysis, etc., gathered on a project-by-project basis, for various generation, transmission, distribution, and general plant additions, as well as for technology/information services. This information is being offered into the record, in order to be responsive to the Commission's concerns, as expressed in its most recent Order No. 10, in Dockets UE-090134/UG-090135, that additional documentation should be provided to demonstrate, on the record, that such costs are known, and susceptible of audit. (Order, supra, at para(s) 45 and 93) This additional documentation, in exhibit form, addresses:

- 23 Generation Projects (Testified to by Mr. Storro; Exhibits RLS-5 and RLS-5C)
- 43 Transmission/Distribution Projects (Testified to by Mr. Kinney; Exhibits SJK-4, SJK-4C, SJK-6 and SJK-6C)
- 6 Technology/Information Services Initiatives (Testified to by Mr. Kensok; Exhibits JMK-3 and JMK-3C)

In total, this additional supporting documentation comprises approximately 2,000 pages (and, if stacked, would stand approximately 16 inches tall) and would fill nearly 5 additional three-inch binders. Ordinarily, the information would be made available for audit purposes anyway, but Avista wishes to be responsive to any concerns that it is not "in the record" itself.

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<sup>2</sup> In its Order No. 10, in Dockets No(s) UE-09134 and UG-090135, the Commission expressed its concerns that the relevant purchased power and related contracts and affiliated interest filings were not of record. (See para. 204)

<sup>3</sup> The Lancaster Generating Facility is a 245MW natural gas-fired combined-cycle combustion turbine (CCCT) plant located in Rathdrum, Idaho.

## II.

4 WAC 480-07-510(1) requires that the Company file nineteen (19) copies of all exhibits, in paper format, as well as furnishing an electronic copy. Avista requests that WAC 480-07-510 be waived insofar as it would require multiple copies of the above-referenced exhibits of Mr. Storro, Mr. Kinney, and Mr. Kensok, to also be filed and served in a paper format (not just electronically). Instead, Avista has presented, in electronic format, this information in the following manner, doing so on a project-by-project basis, as illustrated by an example in the attached excerpts from the testimony of Mr. Storro, as it relates to one of the 23 projects he testifies to - i.e., the “Noxon Unit #3 Runner Replacement” (See Attachment A to this Motion):

1. An excerpt providing a description of the Noxon Project from the direct testimony of Mr. Storro in Exhibit RLS-1T (a paper exhibit) (See page 1 of Attachment A),
2. A paper copy of a summary template prepared for each project, describing the project, its costs, and its in-service date, together with any supporting documentation. (See excerpt from Storro paper Exhibit RLS-4, appearing at pages 2-3 of the Attachment A to this Motion, describing the “Noxon Unit #3 Runner Replacement”). For Mr. Storro alone, 23 individual templates were prepared, one for each project, and compiled in his Exhibit RLS-4; and
3. A “screen-shot” of the electronic index of all other supporting documents which are otherwise included only in electronic format as part of his Exhibit RLS-5, in support of the adjustment for “Noxon Unit #3”. (See page 4 of Attachment A) This electronic

index will facilitate the review of this voluminous material, by allowing the user to navigate quickly and easily through the attached electronic documentation.<sup>4</sup>

5 Accordingly, Avista is requesting that WAC 480-07-510(1) be waived, insofar as it requires the filing and service of paper copies of the identified materials, so that Avista may file such material only in electronic format. Avista does not believe the Commission or any party will be prejudiced thereby; indeed, doing so may facilitate their review of the case. To do otherwise may unnecessarily burden the record with voluminous paper copies, and would cause Avista to expend the resources necessary to produce and serve multiple paper copies of extensive documentation.

6 If, however, at any point during the course of the general rate case, the Commission or any party desires a paper copy of any of the electronic material, Avista will be happy to furnish the same upon request. If, nevertheless, the Commission otherwise rejects this Motion, and requires additional paper copies of all such material at the outset, Avista would ask that it be given a reasonable period of time – i.e., two weeks – to compile and serve additional paper copies to supplement its rate case filing.

7 Finally, one paper copy of what is contained within the electronic exhibits has been furnished at the time of filing, for use as the official record.

### III.

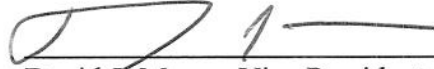
8 WHEREFORE, Avista respectfully requests a waiver of the Commission's rules to allow for the electronic filing only, of Exhibits RLS-5, RLS-5C, SJK-4, SJK-4C, SJK-6, SJK-6C, JMK-3 and JMK-3C.<sup>5</sup> A copy of this Motion has been served on all parties of record in Avista's most recent general rate case (Docket No. UE-090134/UG-09135).

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<sup>4</sup> By clicking on the hyperlink on the electronic index page, the viewer is quickly sent to the identified documentation.

<sup>5</sup> Consistent with past practice, the Company has also provided copies of its 2009 Electric IRP (Exhibit No. (RLS-2)), 2009 Natural Gas IRP (Exhibit No. (KJC-4)), and 2007 Electric IRP (Exhibit No. (RLJ-4, Section B)) in CD form only, due to their voluminous nature, and as they have been previously filed with the Commission and

RESPECTFULLY SUBMITTED this 22nd day of March, 2010.

A handwritten signature in black ink, appearing to read 'D. J. Meyer', is written over a horizontal line.

David J. Meyer, Vice President and Chief Counsel  
for Regulatory and Governmental Affairs

cc: Service List

**Attachment A**  
**to the**  
**Motion for a Waiver of Paper-Filing Requirements**

Excerpt from Testimony of Mr. Storro  
Exhibit \_\_\_\_ (RLS-1T)

**Page 1**

1 stator age. This work was completed in 2009. The costs and additional generation of this project  
2 were pro formed, and approved for recovery, in Docket No. UE-090134.

3 The upgrade work on Units 3, 2 and 4 began in 2009 and will continue into 2012. The  
4 Unit #3 upgrade, planned for completion in April 2010, is planned to increase energy efficiency  
5 by 4.15%, and boost the unit rating 7.5 MW. The costs and additional generation for Unit #3  
6 were also pro formed, and approved for recovery, in Docket No. UE-090134.

7 Unit #2 is scheduled to have a new turbine and complete mechanical overhaul between  
8 August 2010 and April 2011. This upgrade is planned to increase Unit #2 efficiency 2.42% and  
9 boost the unit rating by 7.5 MW.

10 The upgrade work at Unit #4 involves the installation of a new turbine and a complete  
11 mechanical overhaul from August 2011 through April 2012. The Unit #4 upgrade is planned to  
12 increase efficiency 1.49% and increase the unit rating by 7.5 MW.

13 The costs associated with Unit #3, which will be completed in April 2010, will total  
14 approximately \$9.3 million (system), and Unit #2, planned for completion in April 2011, will  
15 cost approximately \$9.2 million (system), as further described in Company witness Mr.  
16 DeFelice's testimony. Company witness Ms. Andrews incorporates the Washington share of  
17 these costs in her adjustments. The costs for the upgrade for Noxon Rapids Unit #4 has not been  
18 included in this case, but will be included in future rate proceedings.

19 Exhibit No. \_\_(RLS-4), pages 1-4, and electronic Exhibit No.\_\_(RLS-5), Schedules 1 and  
20 2, include supporting documentation for the 2010 Unit #3 and the 2011 Unit #2, respectively,  
21 projects described above.

22 **Q. Can you please provide a brief description of the other generation-related**  
23 **capital projects that are included in this case?**

**Attachment A  
to the  
Motion for a Waiver of Paper-Filing Requirements**

Pages 1-2 of Exhibit \_\_\_\_ (RLS-4) of Mr. Storro

**Pages 2-3**



**AVISTA UTILITIES  
2010 CAPITAL PROJECTS**

**ER No.: 4138 (See also, Exhibit No.\_\_(RLS-5), Schedule 1, for additional supporting documentation):**

**ER Name: Noxon Unit# 3 Runner Replacement**

**Pro Forma Amount: \$9,265,371**

**Expended to date: \$5,762,262**

**2010 Transfer to Plant Date: April 2010**

**Project Description:**

The Company is in the middle of a multi-year program to upgrade the Noxon Rapids generating units which are currently using 1950's era technology. The upgrades on these four units are expected to improve efficiency by adding an additional 30 MW of capacity and approximately 6 aMW of energy to the Noxon Rapids project, as well as improve reliability. Illustration No. 4 below summarizes the timing and additional capacity and efficiency gains of these upgrades.

**Noxon Rapids Upgrades**

<b>Noxon Rapids Unit #</b>	<b>Schedule of Completion</b>	<b>Additional Capacity</b>	<b>Additional Efficiency</b>
1	April 2009	7.5 MW	4.16%
3	April 2010	7.5 MW	4.15%
2	April 2011	7.5 MW	2.42%
4	April 2012	7.5 MW	1.49%

The Unit #1 work consisted of the replacement of the stator core, rewinding the stator, installing a new turbine and performing a complete mechanical overhaul. This upgrade increased the Unit's energy efficiency by 4.16%, and increased the unit rating by 7.5 MW. The upgrade also fixed several reliability concerns for the Unit including mechanical vibration and stator age. This work was completed in 2009. The costs and additional generation of this project were pro formed, and approved for recovery, in Docket No. UE-090134.

The upgrade work on Units 3, 2 and 4 began in 2009 and will continue into 2012. **The Unit #3 upgrade, planned for completion in April 2010, is planned to increase energy efficiency by 4.15%, and boost the unit rating 7.5 MW. The costs and additional generation for Unit #3 were also pro formed, and approved for recovery, in Docket No. UE-090134.**

Unit #2 is scheduled to have a new turbine and complete mechanical overhaul between August 2010 and April 2011. This upgrade is planned to increase Unit #2 efficiency 2.42% and boost the unit rating by 7.5 MW.

The upgrade work at Unit #4 involves the installation of a new turbine and a complete mechanical overhaul from August 2011 through April 2012. The Unit #4 upgrade is planned to increase efficiency 1.49% and increase the unit rating by 7.5 MW.

**AVISTA UTILITIES  
2010 CAPITAL PROJECTS**

The costs associated with Unit #3, which will be completed in April 2010, will total approximately \$9.3 million (system), and Unit #2, planned for completion in April 2011, will cost approximately \$9.2 million (system), as further described in Company witness Mr. DeFelice's testimony. Company witness Ms. Andrews incorporates the Washington share of these costs in her adjustments. The costs for the upgrade for Noxon Rapids Unit #4 has not been included in this case, but will be included in future rate proceedings.

**Offsets:**

This generation plant investment is included in the power cost calculation (Aurora model) and included in the production property adjustment, which adjusts rate year costs to match test year loads. There are no other identifiable O&M cost reductions for 2010 investments.

**Timeline:**

Start Date: July 2009

End Date: April 2010

See attached timeline at page 76.

**Attachment Index (See Exhibit No.\_\_(RLS-5), Schedule 1, for additional supporting documentation, as listed below):**

• ER Historical Cost Detail	pg. 3
• Capital Project Request (CPR) Forms, including all attachments	pg. 4 - 6
• Application for Renewable Energy Production Tax Credit Certification	pg. 7 - 38
• FERC – Order Certifying Incremental Hydropower Generation for Production Tax Credit (Noxon Rapids HED Unit #1) – Issued 01/04/10	pg. 39 - 40
• FERC – Errata Notice for Order Certifying Incremental Hydropower Generation for Production Tax Credit (Noxon Rapids HED Unit #1	pg. 41
• Economic Studies	pg. 43 - 73
• Project Costs	pg. 74 - 75
• Detailed Timeline	pg. 76
• Contracts	pg. 77 - 115
• Purchase Orders	pg. 116 - 128
• Other Information	pg. 129 - 183

**Note:**

During the course of Avista's pending general rate case, updated information will be available for audit.

**Attachment A**  
**to the**  
**Motion for a Waiver of Paper-Filing Requirements**

Screen Shot of Index Page of Electronic Exhibit No. \_\_\_\_ (RLS-5)  
of Mr. Storro, containing supporting electronic documentation

Adobe Acrobat Standard - [Exhibit No.\_\_(RLS-5).pdf]

File Edit View Document Comments Tools Advanced Window Help

Search Create PDF Comment & Markup Send for Review Secure Sign Note Tool Text Edits Stamp Tool Show

Select 118% Help Callout Tool Cloud Tool Arrow Tool Dimensioning Tool

Exhibit No.\_\_(RLS-5), Schedule 1

**AVISTA UTILITIES  
2010 CAPITAL PROJECTS**

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1 of 1266