

Exhibit No. ____ (DJR-3)
Docket UE-110876/UG-110877
Witness: Deborah J. Reynolds

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

**AVISTA CORPORATION d/b/a AVISTA
UTILITIES,**

Respondent.

**DOCKET UE-110876
DOCKET UG-110877**

(Consolidated)

**EXHIBIT TO
RESPONSE TESTIMONY OF**

Deborah J. Reynolds

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*NWEC Cover Letter and Data Requests 2-4
Dated September 1, 2011*

February 24, 2012

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the WUTC vs. Avista

Docket Nos. UE-110876 & UG-110877

NW ENERGY COALITION REQUEST NO. 2

- (a) For each customer class, how much of the Company's proposed revenue requirement represents distribution and customer fixed costs, transmission fixed costs, and generation fixed costs, respectively?
- (b) For each customer class, under the Company's proposal, how much of those fixed costs would be recovered from: (1) volumetric energy charges; (2) demand charges; and (3) fixed charges, respectively?
- (c) How would the numbers above change if monthly customer charges were maintained at existing levels?

In responding to the above data request, please define "fixed costs" as the company's revenue requirement excluding production costs, which "are those that vary more or less directly with energy consumption in the short run," including "fuel", "purchased power", and "transmission by others'." [Definitions from: Regulatory Assistance Project, *Revenue Regulation and Decoupling* (June 2011), p. 4].

NW ENERGY COALITION REQUEST NO. 3

Please provide the Company's actual and normalized retail electricity sales by customer class in Washington in each of the last twenty years.

NW ENERGY COALITION REQUEST NO. 4

Please provide the number of customers by customer class served by the company in Washington in each of the last twenty years.