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

3TIER Environmental Forecast Group Advocates for the West Alaska Housing Finance Corporation Alliance to Save Energy Alternative Energy Resources Organization American Rivers The Apollo Alliance Audubon Washington Bonneville Environmental Foundation 'a Motivation Program ty Board of Oregon

.uand City 6. Clackamas County Weatherization

Climate Solutions The Climate Trust

Community Action Partnership of Oregon Community Action Partnership Assoc. of Idaho

Conservation Services Group David Suzuki Foundation Earth and Spirit Council Earth Ministry **Ecos Consulting Ecological Design Center** 

**Emerald People's Utility District** The Energy Project Energy Trust of Oregon, Inc.

eFormative Options, LLC

enXco Development Corporation Environment Oregon

**Environment Washington** Eugene Water & Electric Board

Friends of the Earth Golden Eagle Audubon Society Grasslands Renewable Energy

Horizon Wind Energy Home Performace Washington

Housing and Comm. Services Agency of Lane Co. Human Resources Council, District XI berdrola Renewables

daho Conservation League daho Rivers United daho Rural Council daho Wildlife Federation

nterfaith Network for Earth Concerns Cootenai Environmental Alliance

aborers International Union of North America, NW Region .eague of Women Voters - ID, OR & WA **Vietrocenter YMCA** 

**Vissoula Urban Demonstration Project** Montana Audubon

Viontana Environmental Information Center Montana Public Interest Research Group Montana Renewable Energy Association

ver Action out Unlimited Moontown Foundation

The Mountaineers Aultnomah County Weatherization National Center for Appropriate Technology

Vatural Resources Defense Council New Buildings Institute Northern Plains Resource Council Northwest Energy Efficiency Council

Vorthwest Renewable Energy Institute Northwest Solar Center

W Natural IW SEED

Divmpic Community Action Programs )pportunities Industrialization Center of WA

Opportunity Council )regon Action

)regon Energy Coordinators Association )regon Environmental Council )reaon HEAT

acific Energy Innovation Association 'acific NW Regional Council of Carpenters acific Rivers Council

he Policy Institute 'ortland Energy Conservation inc. 'ortland General Electric

uget Sound Alliance for Retired Americans

uget Sound Energy

lenewable Northwest Project liver Network almon for All

ave Our Wild Salmon eattle Audubon Society eattle City Light

ierra Club ierra Club, BC and MT Chapters

nake River Alliance olar Oregon

outh Central Community Action Partnership, Inc outheast Idaho Community Action Agency outhern Alliance for Clean Energy

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rout Unlimited Inion Of Concerned Scientists Inited Steelworkers of America, District 11 VA CTED - Housing Division Vashington CAN! vashington Environmental Council

Vashington State University Energy Program Yorking for Equality And Economic Liberation World Institute for a Sustainable Humanity Jorld Steward



NW Energy Coalition

ATTY GENERAL

RECEIVED

September 1, 2011

#### SENT VIA E-MAIL & U S MAIL

To: Avista

Re:

NW Energy Coalition Data Request No. 2-4, in the Matter of the WUTC

vs Avista, UE-110876 & UG-110877

Please respond to the attached Data Requests in the above-captioned matter. Please provide each response on a separate piece of paper, repeating the request at the top of the page on which the request begins.

Please indicate the date the response was prepared and the name and phone number of the individual who prepared the response and the witness who can be cross-examined on it.

Where a document or other information is requested, the request refers to information and/or documents held by the company or its contractor/consultant. If the company's response to any request is that the requested documents are too voluminous to produce, or that the document is only available for review at your offices, please provide an index of all of the relevant documents, a description of each document, and the number of pages of each document.

These requests are continuing in nature. If, subsequent to the response, additional information becomes available which is within the purview of the request, the response should be supplemented.

Thank you for your assistance.

Danielle Dixon

Sincerely

Senior Policy Associate

Service List (First Class Mail & Email) cc:

Please only send the responses electronically to reduce paper waste!

# 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.