

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

AVISTA CORPORATION d/b/a  
AVISTA UTILITIES,

Respondent.

DOCKETS UE-170485/UG-170486  
(*Consolidated*)

COMMISSION STAFF'S RESPONSE  
TO AVISTA'S MOTION FOR LEAVE  
TO SUBMIT SUPPLEMENTAL  
TESTIMONY

**I. INTRODUCTION**

1 Pursuant to WAC 480-07-375(4), Staff of the Washington Utilities and  
Transportation Commission (Commission) files this response to Avista Corporation's  
Motion for Leave to Submit Supplemental Testimony addressing certain power supply  
issues. Commission Staff (Staff) supports granting Avista's motion, but Staff cannot, at this  
time, endorse Avista's position that the procedural schedule need not be adjusted.

**II. DISCUSSION**

2 On August 11, 2017, Avista filed its motion along with supplemental power cost  
testimony through Mr. Clint Kalich. Avista's filing is responsive to Staff's concerns that  
Avista made numerous changes to both the dispatch model's inputs and to the parameters of  
the model itself, which were not identified or explained in the Company's initial filing. Staff  
welcomes Avista's willingness to supplement the record on power costs and looks forward  
to thoroughly reviewing and analyzing Mr. Kalich's supplemental testimony and  
workpapers.

3 As the company's motion indicates, Staff provided Avista with those issues that Staff  
was able to identify as lacking sufficient explanation and support in Avista's initial filing.  
Staff by no means views the issues it raised as an exclusive or final listing of all of the issues

relating to power costs that may require additional explanation and support. Given the number of changes to how power costs were modeled, there may well be other issues. Staff has made its position clear to Avista, as can be seen in the attached email, which is Staff's response to the Avista email that is attached to Avista's motion.<sup>1</sup>

4 As Staff has just begun its review of the new evidence, Staff is not in a position to agree that the current procedural schedule will be sufficient to facilitate review of Avista's power cost case. Otherwise, however, Staff supports Avista's motion as a productive way to move forward in this case.

Dated this 16<sup>th</sup> day of August 2017.

Respectfully submitted,

ROBERT W. FERGUSON  
Attorney General

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<sup>1</sup> Attachment to Declaration of Jennifer Cameron-Rulkowski.  
STAFF'S RESPONSE TO AVISTA'S  
MOTION FOR LEAVE TO SUBMIT  
SUPPLEMENTAL TESTIMONY - 2