

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION
RESPONSE TO DATA REQUEST

DATE PREPARED:	May 22, 2000	WITNESS:	Alan Buckley
CASE NO:	UE-991606	RESPONDER:	Alan Buckley
	UG-991607	TELEPHONE:	(360) 664-1306
REQUESTER:	Avista Corporation		

REQUEST NO. 133:

RE: Page 39. With regard to Mr. Buckley's statement "My adjustment reflects what I believe to be a conservative expectation of net revenues that could be achieved in an average year from trading activities consistent with acceptable risk exposure."

- (a) Please fully explain all of the reasons that Mr. Buckley believes that his adjustment is a "conservative expectation."
- (b) Please fully explain any direct experience Mr. Buckley has had in executing short-term electric commercial trading transactions in the Northwest or in developing trading strategies related to these transactions.
- (c) Please identify the amount of time (hours, days, weeks, months, etc.) Mr. Buckley has spent at the trading floors of the Northwest investor-owned utilities for 1998, 1999 and 2000. Please specifically identify the utility trading floors visited, the dates of the visits, and the amount of time spent on each respective trading floor.
- (d) During the period October 22, 1999 through May 5, 2000, did Mr. Buckley visit Avista Utilities' trading floor and discuss trading operations with Avista's personnel? If so, please specify the date or dates, the amount of time spent on the trading floor, and the individuals with whom Mr. Buckley spoke.

RESPONSE:

- (a) See the testimony of Staff witness Mr. Buckley, Exhibit T-___ (APB-T), page 38, line 16 through page 44, line 2. In addition see Staff's workpapers, included in response to Avista Data Request No. 112.
- (b) Mr. Buckley has not been employed as an energy trader. Mr. Buckley has reviewed the material provided by the Company in its direct case and in subsequent responses to data requests in this proceeding.
- (c) Mr. Buckley has not spent time on the trading floor (with the exception of a short tour of Bonneville's trading floor in early 1999) during 1998, 1999, or 2000.
- (d) No. Mr. Buckley has reviewed the material provided by the Company in its direct case and in subsequent responses to data requests in this proceeding.

WUTC

DOCKET NO. WE-991606

E. NUMBER 550

ACCEPT

W/D

REJECT