

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-090134

DOCKET NO. UG-090135

DOCKET NO. UG-060518

(consolidated)

REBUTTAL TESTIMONY OF

RICHARD L. STORRO

REPRESENTING AVISTA CORPORATION

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I. INTRODUCTION

Q. Please state your name, employer and business address.

A. My name is Richard L. Storro. I am employed as the Vice President of Energy Resources by Avista Corporation located at 1411 East Mission Avenue, Spokane, Washington.

Q. Have you previously provided direct testimony in this Case?

A. Yes. My testimony provided an overview of Avista’s resource planning and power operations and discussed hydro and thermal project upgrades.

Q. What is the scope of your rebuttal testimony in this proceeding?

A. Commission Staff witness Mr. Kermode, in his direct testimony at pages 27 through 41, proposes to exclude certain generation, transmission, distribution and general plant capital investment that the Company pro formed in its direct case, which will be in service by December 2009 and will be used to serve customers for rate making purposes. For generation and transmission plant additions, Staff only included projects completed during the period October 1, 2008 through June 30, 2009. These projects were selected by Staff since they were known and measurable. Company witnesses Mr. Norwood and Mr. DeFelice address these issues raised by Staff in their rebuttal testimony.

In support of Mr. Defelice’s rebuttal testimony, I will provide descriptions of the generation-related capital projects that will be completed and in-service by the end of 2009 that are included in this case. The testimony is divided into descriptions of thermal, hydro and other generation capital projects.

Q. Briefly describe your responsibilities and your duties related to the generation capital projects.

1 A. In my role as Vice President of Energy Resources, I am responsible for the
2 management of power resources for meeting the Company's projected load requirements. I
3 receive regular reports concerning customer loads, the status of currently owned and controlled
4 generation projects as well as new projects and upgrades to existing resources. My position
5 requires knowledge of the development, construction and timing of new generation projects and
6 upgrades to existing projects. This knowledge enables me to provide details about which
7 generation capital projects will be completed by the end of 2009.

8 **Q. What is the total amount that will be spent on generation capital through the**
9 **end of 2009?**

10 A. The total amount of 2009 generation capital spending will be \$21,436,000 by the
11 end of the year. This includes \$7,788,000 on thermal projects, \$9,070,000 on hydro projects and
12 \$4,578,000 on other generation capital projects. Table 1 below details the generation capital
13 projects for 2009 (system) and shows the amount that was transferred to plant-in-service through
14 June 30, 2009 and the amount that will be transferred before the end of 2009.

Table 1
2009 Generation Projects - System
(000s)

Generation:	Projects		2009 Final Costs
	Projects Completed January 1, 2009 through June 30, 2009	Completed July 1, 2009 through December 31, 2009	
Thermal - Kettle Falls Capital Projects	\$ 202	\$ 1,594	\$ 1,796
Thermal - Colstrip Capital Additions	2,942	2,966	5,908
Thermal - Other small projects	0	84	84
Hydro - Cabinet Gorge Capital Projects	226	167	393
Hydro - Little Falls Capital Projects	0	525	525
Hydro - Long Lake Capital Projects	0	597	597
Hydro - Noxon Capital Projects	741	328	1,069
Hydro - Upper Falls Capital Projects	90	2,463	2,553
Hydro - Clark Fork Implement PME Agreement	79	2,225	2,304
Hydro - Other small projects	424	1,205	1,629
Other - Northeast Combustion Turbine Projects	0	944	944
Other - CS2 Captital Projects	0	677	677
Other - CS2 LTSA	0	2,000	2,000
Other - Rathdrum CT	10	0	10
Other small generation projects	250	697	947
	\$ 4,964	\$ 16,472	\$ 21,436

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2 **Q. Are these expenditures for different generation capital projects than those**
3 **originally submitted by Company witness DeFelice?**

4 A. No, these expenditures are for the same generation capital projects that were
5 included in Mr. DeFelice's direct testimony. The project costs have been updated with actual or
6 known charges and have been reviewed to ensure that these projects will be completed by the end
7 of 2009. The planned expenditures for these projects in our original filing were \$20,737,000
8 which is very close to the current estimate of \$21,436,000.

9 **Q. Is the Company proposing to update its revenue requirement in this case**
10 **using these updated estimates?**

1 A. No. This updated information is being provided in response to testimony filed by
2 Staff and Public Counsel, to emphasize the fact that these projects will be completed in 2009, are
3 known and measureable, and the costs should be included for recovery in this case.

4 **II. THERMAL GENERATION CAPITAL PROJECT DESCRIPTIONS**

5 **Q. What is the total amount of capital spending on thermal generation assets**
6 **and briefly describe the projects?**

7 A. Total capital spending for thermal generation capital projects through the end of
8 2009 is \$7,788,000 (system). The projects include work at Kettle Falls Generation Station
9 (\$1,796,000), Colstrip (\$5,908,000) and other small thermal projects (\$84,000).

10 **Q. Please describe the capital projects that are being done at the Kettle Falls**
11 **Generation Station in 2009.**

12 A. Several capital projects are being completed at the Kettle Falls Generating Station
13 to maintain plant reliability. The primary capital project being completed in 2009 is the
14 replacement of the original steam turbine control system. Several other smaller projects are also
15 being done including the replacing portions of the fuel handling and ash removal systems, and a
16 continuation of a project to replace the traveling grate in the boiler. The total cost of these
17 projects in 2009 is \$1,796,000.

18 **Q. What capital projects are being completed at Colstrip in 2009?**

19 A. The \$5,908,000 of Colstrip capital projects for 2009 include several major
20 emission control projects for Units 3 and 4. Boiler modifications are being made to reduce
21 mercury emissions on both units in order to comply with Montana state mercury emissions
22 control laws which go in to effect on January 1, 2010. Low NOx burners are being installed on

1 Unit 4 to comply with Montana DEQ requirements. The NO_x burner modifications were
2 previously installed on Unit 3. Major capital work and a regularly scheduled overhaul are also
3 being done on Unit 4 in 2009. The capital projects on Unit 4 include cooling tower fill
4 replacement, low pressure turbine overhaul, an air pre-heater overhaul, a generator rewind kit,
5 and several smaller capital projects that will be completed during the scheduled outage.

6 **III. HYDRO GENERATION CAPITAL PROJECT DESCRIPTIONS**

7 **Q. What is the total amount of capital spending on hydro generation assets and**
8 **briefly describe the projects?**

9 A. Capital spending for hydro generation assets in 2009 will be \$9,070,000 (system).
10 This includes projects for the Clark Fork and Spokane River Hydroelectric Projects.

11 **Q. What capital projects are being completed on the Clark Fork facility?**

12 A. There will be \$393,000 of capital projects complete in 2009 at the Cabinet Gorge
13 Hydroelectric Project. The capital projects include the replacement of a discharge ring on Unit
14 #1 and replacement of the Generator Step Up Transformers to accommodate the increased power
15 from turbine improvements. The 2009 capital spending at the Noxon Rapids Hydroelectric
16 Project will be \$1,069,000. These expenditures are for the completion of the upgrade to Unit #1.
17 The upgrade includes replacement of the stator core and stator windings, installation of a new
18 high efficiency turbine runner, and a complete mechanical overhaul on Unit #1. There are
19 several projects that are part of the protection, mitigation and enhancement (PME) plan that will
20 be completed in 2009 at a cost of \$2,304,000. These projects were agreed to as part of the Clark
21 Fork Settlement Agreement and FERC license received in 2001.

22 **Q. What capital projects are being completed on the Spokane River Projects?**

1 A. The roof will be replaced at Little Falls at a cost of \$525,000. The scroll case
2 drain system will be replaced at Long Lake and dam safety monitoring systems for the forebay,
3 tailrace, and sump will be installed at a total cost of \$597,000. There will be \$2,553,000 in
4 capital spending at Upper Falls in 2009. The old plant controls will be replaced and all new
5 equipment from the Post Street Substation will be relocated to the Upper Falls plant. New
6 equipment will also be installed to modernize Little Falls, enhance the protection schemes and
7 automate the plant from the Generation Control Center.

8 There are several other small hydro capital projects that will be completed on the
9 Spokane River Projects by the end of 2009 at a cost of \$1,629,000. The capital projects include
10 the beginning of a system station sump control and monitoring systems to facilitate license
11 conditions along with other small projects. Please refer to the workpapers of Mr. DeFelice for a
12 detailed listing of these other small projects.

13 **IV. OTHER GENERATION CAPITAL PROJECT DESCRIPTIONS**

14 **Q. What is the total amount of capital spending in 2009 on other generation**
15 **assets and briefly describe those projects?**

16 A. There is an additional \$4,578,000 (system) of other generation capital spending
17 that will be completed by the end of 2009. These projects include \$944,000 at the Northeast
18 Combustion turbine, \$2,677,000 for Coyote Springs 2, and \$957,000 on other small capital
19 projects.

20 **Q. Please describe the other generation capital projects that will be completed in**
21 **2009.**

1 **Q. Does this conclude your rebuttal testimony?**

2 **A. Yes it does.**