

**Exh. JDW-22C
Dockets UE-240006/UG-240007
Witness: John D. Wilson
REDACTED VERSION**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

AVISTA CORPORATION,

Respondent.

**DOCKETS UE-240006 & UG-240007
(Consolidated)**

EXHIBIT TO

TESTIMONY OF

JOHN D. WILSON

**ON BEHALF OF STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

Avista's Response to Staff Data Request No. 189

July 3, 2024

CONFIDENTIAL PER PROTECTIVE ORDER

**AVISTA CORP.
RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/26/2024
CASE NO.:	UE-240006 & UG-240007	WITNESS:	Clint Kalich
REQUESTER:	UTC Staff	RESPONDER:	Lori Hermanson
TYPE:	Data Request	DEPT:	Power Supply
REQUEST NO.:	Staff – 189	TELEPHONE:	(509) 495-4658
		EMAIL:	lori.hermanson@avistacorp.com

SUBJECT: Power Supply

REQUEST:

Re: Kalich Exh. CGK-4, line 14, Exh. CGK-2CNative, tab Conf Aurora Portfolio Output and workpaper Rattlesnake Flat. According to Exh. CGK-4, “Contract purchase based on output estimated by facility, as project entered commercial service in late 2020.” The workpaper tab Aurora input appears to indicate that average historical generation by calendar date was used for modeling (636,825 MWh). Output estimated by the facility is 468,932 MWh. Exh. CGK-2CNative indicates model output for this facility of [REDACTED] MWh. Please provide detailed support for the model input for this facility and reconcile it with the supporting workpaper.

RESPONSE:

Line 14 of CGK-4 was, in error, not updated from the prior case. In the prior case, there was very limited history available so Avista relied on the manufacturer’s estimate of generation. For this case, now that actual data is available, Avista treated Rattlesnake according to our agreed upon methodology and used 3 years of actuals. Manufacturers’ estimates of generation always tend to overestimate generation from what is seen in operations. Now that enough data is available, Avista used actual data.