

EXH. JAD-9
DOCKETS UE-240006 & UG-240007
WITNESS: JIM A. DENNISON

RESPONSE TESTIMONY OF JIM A. DENNISON
ON BEHALF OF SIERRA CLUB

EXH. JAD-9
AVISTA RESPONSE TO SIERRA CLUB DATA REQUEST SC-017

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/07/2024
CASE NO.:	UE-240006 & UG-240007	WITNESS:	Josh DiLuciano
REQUESTER:	Sierra Club	RESPONDER:	Terrence Browne
TYPE:	Data Request	DEPT:	Gas Engineering
REQUEST NO.:	SC – 017	TELEPHONE:	(509) 495-8551
		EMAIL:	Terrence.browne@avistacorp.com

SUBJECT: Capital Additions

REQUEST:

Please refer to Exhibit JDD-1T at page 50, lines 20 to 22. Please identify and provide all studies, analyses, data, and other documents that Mr. DiLuciano relied upon for the conclusion that “[t]o date, no alternative has allowed us to continue providing adequate capacity for our natural gas customers.”

RESPONSE:

First, the introduction of non-pipe alternatives (NPAs) as a consideration in Avista’s gas distribution planning process began when the Commission approved the settlement stipulation in the Company’s 2022 general rate case, which went into effect on December 21, 2022. Following that approval, the Company introduced a standard for when it would consider NPAs (i.e., for reinforcements greater than \$500k) in its 2023 Natural Gas IRP that was filed on March 31, 2023. As such, it is important to note that the incorporation of NPAs in distribution planning is still relatively new and the Company has little experience with NPAs to date.

NPAs available to Avista include 1) pressure uprates, 2) targeted energy efficiency measures, and 3) electrification. Avista will always consider pressure uprates to defer or eliminate a reinforcement, however, most of Avista’s distribution systems are already operating at maximum allowable operating pressures. Targeted energy efficiency measures, which may be expensive to study to understand if they will defer the need for a potential reinforcement, take years to implement, and Avista has no control over whether customers choose to participate in energy efficiency or not. Electrification of end use customer load has similar challenges as targeted energy efficiency.

Currently there are no large reinforcement projects scheduled in the next 5 years in WA where NPAs could provide a meaningful impact. Please refer to the Non-Pipe Alternatives section in Chapter 8 Distribution Planning of Avista’s 2023 Natural Gas IRP for additional information on Avista’s approach to NPAs.