

Before the  
Washington Utilities and Transportation Commission

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Washington Utilities and Transportation Commission

vs.

Avista Corporation

Docket Nos. UE-991606 / UG-991607

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Northwest Energy Coalition Data Request to Spokane Neighborhood Action Programs (SNAP):

**Request #6:** Reference page 35, lines 4 - 11 of Colton testimony. Please explain what is meant by "minimum" cost offsets and indicate whether the "minimum" is or is not likely.

**Response:** The statement about "minimum" offsets was based on the assumption stated in the testimony that the offsets were generated exactly proportionate to the number of low-income customers in the service territory. ("Assuming, however, that low-income consumers contribute to costs in direct proportion to their numbers (i.e., since 26% of all customers live at or below 150% of Poverty Level, 26% of all collection costs are attributable to customers living at or below 150% of Poverty.") As indicated in SNAP response to NVEC Data Request #4, however, both Census and HUD data reveal that low-income customers are "more likely" --not "as likely"-- to be in payment-trouble than the average customer.

WUTC		
DOCKET NO.	UE-991606	
EXHIBIT #	743	
ADMIT	W/D	REJECT
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