

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION, Complainant, v. AVISTA CORPORATION d/b/a AVISTA UTILITIES, Respondent.	DOCKETS UE-220053 and UG-220054 (<i>consolidated</i>)
Avista Electric Reliability Plan	DOCKET UE-210854 MOTION TO CONSOLIDATE PROCEEDINGS

I. INTRODUCTION

I Avista Corporation d/b/a Avista Utilities (“Avista” or “Company”) filed a general rate case (GRC) with the Washington Utilities and Transportation Commission (Commission) on January 21, 2022, which has been docketed in UE-220053 and UG-220054. On November 11, 2021, Avista filed an update to its Electric Service Reliability Reporting Plan in Docket UE-210854. The November 2021 filing contains matters that are related to the GRC and can be addressed most efficiently by consolidating the reliability filing into the GRC. None of the other parties to the GRC oppose this motion to consolidate so long as granting the motion does not result in a modification to the procedural schedule. Staff believes the Electric Reliability Plan matter can be efficiently integrated into the GRC, and Staff does not seek any change to the procedural schedule.

II. RELIEF REQUESTED

2 Staff respectfully requests that the Commission consolidate Docket UE-210854 with
Dockets UE-220053 and UG-220054.

III. STATEMENT OF FACTS

3 WAC 480-100-393 requires electric utilities subject to Commission jurisdiction to
have a plan on file for monitoring and reporting electric service reliability information. The
rule further requires utilities to file any modification to the plan before the modification is
implemented. Avista's November 2021 filing in Docket UE-210854 is a proposed
modification to Avista's existing electric reliability plan.

4 In Avista's pending GRC, the Company testifies to the numerous issues it already
reports on to the Commission and lists electric reliability reporting pursuant to the electric
reliability plan as one of those issues.¹ In addition, Avista proposes performance measures
for its proposed multiyear rate plan (MYRP), which include electric reliability measures.²

IV. STATEMENT OF ISSUES

5 Should the Commission consolidate Avista's Electric Reliability Plan filing with
Avista's GRC?

V. EVIDENCE RELIED UPON

6 Commission Staff relies on the materials on file in Docket UE-210854 and in
consolidated Dockets UE-220053 and UG-220054.

¹ See Ehrbar, Exh. PDE-1T at 18 - 19:15.

² Ehrbar, Exh. PDE-1T at 30:1 - 31:16; Vermillion, Exh. DPV-1T at 16:2-30.

VI. ARGUMENT

7 The Commission may consolidate proceedings in which “the facts or principles of law are related.”³ Where proceedings share related facts or principles of law, the Commission considers whether consolidation would promote judicial economy and would not unduly delay the resolution of one or all of the proceedings.⁴

8 Avista’s proposed modification to its electric reliability plan is related to the facts in the GRC through Avista’s testimony on both electric reliability reporting and the electric reliability measures that Avista proposes in conjunction with its MYRP performance measures. Consolidation would promote judicial economy because the issues in both matters can most efficiently be considered together. While consolidation could result in a delay in resolution of the reliability plan filing, any delay is not undue in light of the significant benefit to considering the two matters together.

9 As part of the consideration of Avista’s proposed MYRP performance measures, parties will need to consider which electric reliability measures should be used and how they should be tracked and reported. This is intrinsically related to the reliability plan filing, which addresses the process of electric reliability reporting. In its testimony in the GRC, Staff plans to examine options for streamlining reporting in conjunction with reviewing performance measures. The most efficient way for Staff to integrate electric reliability reporting into this inquiry would be to consolidate the reliability reporting proceeding with the GRC.

³ WAC 480-07-320.

⁴ *Wash. Utils. & Transp. Comm’n v. Puget Sound Energy*, Dockets UE-111048 & UG-111049 (Consolidated) & UG-110723, Order 04, 4, ¶ 8 (Sept. 7, 2011).

VII. CONCLUSION

10 For the reasons discussed above, Staff requests that the Commission grant its motion and consolidate Docket UE-210854 with Dockets UE-220053 and UG-220054.

DATED this 16th day of May, 2022.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General

/s/ Jennifer Cameron-Rulkowski, WSBA No. 33734
Assistant Attorney General
Office of the Attorney General
Utilities and Transportation Division
P.O. Box 40128
Olympia, WA 98504-0128
(360) 664-1186
jennifer.cameron-rulkowski@utc.wa.gov