

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION, d/b/a AVISTA UTILITIES

Respondent.

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

**ROBERT L. EARLE
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT RLE-13

Avista's Response to Public Counsel Data Request No. 276

July 3, 2024

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/01/2024
CASE NO.:	UE-240006 & UG-240007	WITNESS:	Clint Kalich
REQUESTER:	Public Counsel	RESPONDER:	Lori Hermanson
TYPE:	Data Request	DEPT:	Resource Planning
REQUEST NO.:	PC – 276	TELEPHONE:	(509) 495-4658
		EMAIL:	lori.hermanson@avistacorp.com

SUBJECT: Power Supply/Energy Recovery Mechanism (ERM)

REQUEST:

Re: Avista Response to PC-128. Slide 10 of “5 minute Analysis internal analysis and modeling 20230612” (PowerPoint).

- a. Please explain why the “ave actual,” “ave projected,” “dif,” and “% dif” values of \$41.59, \$40.63, 0.96, and 2% differ from those in workpaper “MidC Projection Model Powerdex to CAISO 5m hourly 20230531 24WAGRC.xlsx” where the values are \$41.59, \$74.62, -33.03, and -79%, respectively.
- b. Please provide all the data and models in Excel format used to obtain the result cited in the PowerPoint.
- c. With reference to subpart a., does this mean that the Borismetrics model is invalid? Please explain your answer.
- d. Please provide the file “MidC Projection Model Powerdex to CAIOS 5m hr 20230531.xlsx” referenced on slide 10 of “5 minute Analysis internal analysis and modeling 20230612” (PowerPoint).
- e. Please provide the original “daily hourly Powerdex” data in Excel format.
- f. Please explain what is meant by “Powerdex is assumed to be continuous with no missing Powerdex data.”
- g. Was the Powerdex data checked to see if there was missing data? If the answer is yes, please provide evidence that it was checked.
- h. Why is it reasonable to assume that Powerdex data is “continuous with no missing Powerdex data?”

RESPONSE:

Please see Avista’s **CONFIDENTIAL** response to data request PC-DR-276C. Please note that Avista’s response to PC-DR-276C is **Confidential per Protective Order in UTC Dockets UE-240006 and UG-240007**.

- a) The values mentioned in slide 10 are based on the input of 2021 data whereas the values in the workpaper are the resulting statistics based on the forward prices for this rate case (column E). However, it should be noted that since the values in column D are pasted in from the consultant’s initial comparison, the -33.03 difference and the -79% difference are not comparable to what the consultant shared in the slide.
- b) Avista relied on the consultant’s expertise for this work. Avista provided in work papers the models in Excel format received from the consultant.
- c) No, please see a) above
- d) See PC-DR-276C Confidential Attachment A.
- e) Please refer to the Company’s response to PC-271(d)
- f) Please refer to the Company’s response to PC-272
- g) Yes. Please refer to the Company’s response to PC-272.
- h) Please refer to the Company’s response to PC-272. The resulting “continuous with no missing Powerdex data” is shown in the models provided to Avista and provided in the work papers.