

**BEFORE THE WASHINGTON  
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION, d/b/a AVISTA UTILITIES

Respondent.

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

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

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**EXHIBIT RLE-11**

Avista's Response to Public Counsel Data Request No. 274

**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 – 274	TELEPHONE:	(509) 495-4658
		EMAIL:	lori.hermanson@avistacorp.com

**SUBJECT:** Power Supply/Energy Recovery Mechanism (ERM)

**REQUEST:**

**Re: Avista Response to PC-128. Slide 6 of “5 minute Analysis internal analysis and modeling 20230612” (PowerPoint).**

- a. Please explain why the count is 17,567 for each data file while the data from Powerdex is from 12/1/21 to 1/31/23 (p. 3), or only 10,248 hours (31 days in 2021, 365 days in 2022, and 31 days in 2023 = 427 days. 427 days \* 24 hours = 10,248 hours).
- b. Please provide the data files in Excel format used to create the table on slide 6.

**RESPONSE:**

- a) Per slide 6, the consultant describes that after the two data sets were cleaned, or matched, for consistent comparison and only included data from the same time periods between the two datasets. This resulted in a count of 17,567 data points.
- b) Avista relied on the consultant’s expertise for this work and therefore does not have access to the consultants’ spreadsheet used to create the table on slide 6.