

**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-9**

Avista's Response to Public Counsel Data Request No. 272

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

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

**REQUEST:**

**Re: Avista Response to PC-128. Slide 3 of “5 minute Analysis internal analysis and modeling 20230612” (PowerPoint).**

- a. Please provide historical EIM data for CAISO Node(CGAP\_CHPD\_MIDC-APND ) data at the 5 minute level of local marginal prices (LMP\_PRC ) from 2/1/2023 through 4/1/2024.
- b. Please provide Powerdex 1 hour Mid-C prices from 2/1/2023 through 4/1/2024.
- c. The PowerPoint states “Note the 2 data sets is [sic] not perfectly matched & that each data set has missing or inconsistent data that is cleaned before use.” Please provide the original data sets in Excel format, the cleaned data in Excel format, a narrative description of how the data sets were cleaned, and any code used to clean the data sets.
- d. Please reconcile the statement “Note the 2 data sets is [sic] not perfectly matched & that each data set has missing or inconsistent data that is cleaned before use” with the statement on slide 10 of the same PowerPoint that “Powerdex is assumed to be continuous with no missing Powerdex data.”
- e. Is the Powerdex data real-time, day-ahead, or something else? Please explain your answer.

**RESPONSE:**

- a) Please refer to the Company’s response to PC-271(d)
- b) Please refer to the Company’s response to PC-271(d)
- c) Avista relied on the consultant’s expertise for this effort and did not receive copies of the consultant’s work papers. The consultant described the process in the PowerPoint slides (see slides 3-4) where he describes removing data that was missing or inconsistent and used data where both datasets had data for the same time period. This process was necessary for the regression and correlations performed by the consultant.
- d) Slide 3 is referring to the two datasets EIM and Powerdex prices while slide 10 refers to the data after the process described in c) above. Using the data for the same time period for the two datasets for use in the model therefore the input data of daily hourly powerdex is continuous with no missing Powerdex data.
- e) PowerDex is the vendor who provides Avista with the hourly bilateral prices (i.e. hour ahead).