

**Puget Sound Energy COVID-19 Cost Deferral Petition
Dockets UE-200780 and UG-200781**

**Avista Corporation COVID-19 Cost Deferral Petition
Dockets UE-200407 and UG-200408**

**Pacific Power & Light Company COVID-19 Cost Deferral Petition
Docket UE-200234**

**Cascade Natural Gas Corporation COVID-19 Cost Deferral Petition
Docket UG-200479**

**NW Natural COVID-19 Cost Deferral Petition
Docket UG-200264**

**DECLARATION OF LISA W. GAFKEN
IN SUPPORT OF JOINT RESPONSE OF
THE OFFICE OF THE WASHINGTON ATTORNEY GENERAL
PUBLIC COUNSEL UNIT
AND
THE ENERGY PROJECT**

**Exhibit No. 3:
Utilities' Responses to Public Counsel and The Energy Project's
Informal Data Request No. 23**

**Puget Sound Energy's Responses to Public Counsel and The
Energy Project's Informal Data Request No. 23**

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-200780 and UG-200781
Puget Sound Energy
Petition for Order Authorizing Accounting Cost Associated With COVID-19**

PUBLIC COUNSEL & THE ENERGY PROJECT INFORMAL DATA REQUEST NO. 023:

Please state whether the Company is seeking approval to defer for later recovery any lost revenues due to customer load reductions. Also, if the Company is seeking approval to defer for later recovery any lost revenue, please state with specificity the revenues included in the Company's request.

Response:

Puget Sound Energy ("PSE") is not seeking recovery of any lost revenues due to customer load reductions. Revenues PSE believes are eligible for deferral include:

- Late Payment Fees (Recorded in FERC 450, Electric and FERC 487, Gas) – Please see PSE's Response to WUTC Staff Informal Data Request No. 007 for further discussion on Late Payment Fees.
- Disconnection and Reconnection Fees (Recorded in FERC 451, Electric and FERC 487, Gas) – Please see PSE's Response to WUTC Staff Informal Data Request No. 007 for further discussion on Disconnect and Reconnect Fees.

**Avista's Responses to Public Counsel and
The Energy Project's Informal Data Request No. 23**

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	09/23/2020
CASE NO.:	UE-200407 & UG-200408	WITNESS:	N/A
REQUESTER:	PC/TEP	RESPONDER:	Pat Ehrbar
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC/TEP - 23	TELEPHONE:	(509) 495-8620
		EMAIL:	pat.ehrbar@avistacorp.com

REQUEST:

Please state whether the Company is seeking approval to defer for later recovery any lost revenues due to customer load reductions. Also, if the Company is seeking approval to defer for later recovery any lost revenue, please state with specificity the revenues included in the Company's request.

RESPONSE:

No, the Company is not otherwise seeking to defer lost revenue due to customer load reductions for the schedules that are not already applicable to the Company's decoupling mechanisms.

**PacifiCorp's Responses to Public Counsel and
The Energy Project's Informal Data Request No. 23**

PC-TEP Data Request 23

Please state whether the Company is seeking approval to defer for later recovery any lost revenues due to customer load reductions. Also, if the Company is seeking approval to defer for later recovery any lost revenue, please state with specificity the revenues included in the Company's request.

Response to PC-TEP Data Request 23

No, the Company is not seeking approval to defer any lost revenues due to customer load reductions as part of its COVID deferral request.

PREPARER: Shelley McCoy

SPONSOR: To Be Determined

**Cascade's Responses to Public Counsel and
The Energy Project's Informal Data Request No. 23**

Washington Utilities and Transportation Commission
v.
Cascade Natural Gas Corporation
Public Counsel/The Energy Project Data Request
UG-200479

Request No. 23

Date prepared: 09/23/2020

Preparer: Mike Parvinen

Contact: Christopher Mickelson

Email: Christopher.Mickelson@cngc.com

Telephone: 509-734-4549

PC/TEP-23 Please state whether the Company is seeking approval to defer for later recovery any lost revenues due to customer load reductions. Also, if the Company is seeking approval to defer for later recovery any lost revenue, please state with specificity the revenues included in the Company's request.

Response:

The Company is not seeking approval to defer lost revenue from any customer class not included in its Decoupling Mechanism. The Company is not seeking any modification to its Decoupling Mechanism to account for other potential lost revenues or load reductions.

**NW Natural's Responses to Public Counsel and
The Energy Project's Informal Data Request No. 23**



Rates & Regulatory Affairs
UG-200264
COVID-19 Accounting Order Petition
Data Request Response

Date of Response: September 25, 2020
Responder: Jorge Moncayo
Telephone: 503-610-7513
Email: Jorge.moncayo@nwnatural.com
Witness: Will update when known

Request No.: UG-200264 PC TEP IR 23

Please state whether the Company is seeking approval to defer for later recovery any lost revenues due to customer load reductions. Also, if the Company is seeking approval to defer for later recovery any lost revenue, please state with specificity the revenues included in the Company's request.

Response:

While the Company is expecting significant detrimental impact from customer load reduction, NW Natural is not seeking approval to defer lost revenues due to customer load reductions.

The Company, however, is seeking to defer for later recovery lost revenue approved in the last rate cases, related to a) late payment fee revenue; b) field collection charge revenue; and c) delinquent reconnection fees. Please see UG-200264 PC TEP IR 3 for details.