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## AVISTA CORP. RESPONSE TO REQUEST FOR INFORMATION

JURISDICTION: WASHINGTON

DATE PREPARED:

8/25/2009

CASE NO:

UE-090134 & UG-090135

WITNESS:

Jon Powell

REQUESTER: TYPE:

Public Counsel

RESPONDER:

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REQUEST NO.:

Data Request PC - 506

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## **REQUEST:**

RE: Avista's Response to Public Counsel's Data Request No. 283, Attachment A and Mr. Hirschkorn's Exhibit No. (BJH-2) "Titus Evaluation Report," Tables H3-A and H3-B (2006).

- a. Please clarify whether the row labeled "Windows" in the "Residential Projects" section of Tables H3-A and H3-B is intended to refer only to Avista's window replacement program, or to all windows programs, including Energy Star windows for new construction.
- b. Please provide an explanation for the following discrepancy between Avista's reported results of its windows program in 2006:
  - Mr. Hirschkorn's Exhibit No. \_\_\_ (BJH-2) ("Titus Report") at Table i. H3-B (Idaho), p. 55, shows Avista estimated savings of 21,387 therms for Idaho residential windows program.
  - ii. Avista's Response to the Public Counsel data request referenced above. at lines 2951, 3915, 3916, 16278, and 16952, shows a total of 16,582 therms as Avista reported savings from all windows programs in Idaho in 2006.
- Please identify each of the Residential DSM programs included in the category shown as "Other Res Sampled" in Tables H3-A and H3-B.
- Please provide an explanation for the following discrepancy between Avista's reported results of its windows program in 2006:
  - iii. Mr. Hirschkorn's Exhibit No. \_\_\_ (BJH-2) ("Titus Report") at Table H3-A (Washington), p. 54, shows Avista estimated savings of 66,135 therms for Washington residential windows program.
  - Avista's Response to the Public Counsel Data Request referenced iv. above, at lines 3478, 16480, and 18442, shows a total of 47,655 therms as Avista reported savings from all windows programs in Washington in 2006.

## **RESPONSE:**

- a) The row labeled "Windows" refers to all residential window programs including home improvement and new construction.
- b) The 21,387 therms claimed in Table H3-B was the correct amount for 2006 Idaho residential windows (both home improvement and new construction). We claimed 1,844 therms for RR7 (new-E/W facing), 1,209 therms for RR8 (new-N facing), 767 therms for RR9 (new-S facing),

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9,498 therms for RRC (E/W facing), 4,100 therms for RRD (N facing) and 3,969 therms for RRE (S facing). On the attachment for PC-283, we included a query of residential programs by state which included measure types RR7, RRC and RRD totaling 15,442 therms. In March 2008, the Company went from tracking window savings by specific side (direction – E/W, N, S) to a blended savings amount based on weighted average of all sides of the house. It looks like in pulling the 2006 data in response to PC-283, we failed to include individual savings for measure types RR8, RR9 and RRE. Please see "PC\_DR\_506-Attachment A.xls" for additional information on these missed measure types.

- c) "Other Res Sampled" for 2006 based on Research Into Action's appendix appears to include Energy Star homes and water heaters.
- d) The 66,135 therms claimed in Table H3-A was the correct amount for 2006 Washington residential windows (both home improvement and new construction). We claimed 3,767 therms for RR7 (new-E/W facing), 1,850 therms for RR8 (new-N facing), 1,693 therms for RR9 (new-S facing), 29,191 therms for RRC (E/W facing), 14,697 therms for RRD (N facing) and 14,937 therms for RRE (S facing). On the attachment for PC-283, we included a query of residential programs by state which included measure types RR7, RRC and RRD totaling 47,655 therms. In March 2008, the Company went from tracking window savings by specific side (direction E/W, N, S) to a blended savings amount based on weighted average of all sides of the house. It looks like in pulling the 2006 data in response to PC-283, we failed to include individual savings for measure types RR8, RR9 and RRE. Please see "PC\_DR\_506-Attachment A.xls" for additional information on these missed measure types.

Due to the voluminous nature of PC\_DR\_506-Attachment A.xls, it is being provided in electronic format only.