

**BEFORE THE WASHINGTON
UTILITIES & TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION D/B/A/ AVISTA UTILITIES

Respondent.

DOCKETS UE-220053, UG-220054, and UE-210854 (Consolidated)

**SEBASTIAN COPPOLA
ON BEHALF OF THE
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL
PUBLIC COUNSEL UNIT**

EXHIBIT SC-19

Avista's Response to Public Counsel's Data Request No. 115, on CETA Employees

July 29, 2022

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	04/04/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	E. Andrews / S. Bonfield
REQUESTER:	Public Counsel	RESPONDER:	Shawn Bonfield
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 115	TELEPHONE:	(509) 495-2782
		EMAIL:	shawn.bonfield@avistacorp.com

SUBJECT: CETA Labor

(Pro-Forma Adjustments for CETA Labor Expense), Andrews, Exh. EMA-1T at 108:13 to 109:3.

REQUEST:

Please:

- a) Identify specifically what each of the three new employees will be doing and in which department they will be assigned.
- b) Explain why the Company cannot reorganize other employees' responsibilities so they can take on the additional work from CETA and avoid hiring new employees.

RESPONSE:

- a) The following is described in Company witness Mr. Bonfield's testimony Exh. SJB-1T beginning at 37 regarding the three new employees required as a result of the Clean Energy Transformation Act.

1. Customer Engagement Manager

Department: Community and Economic Vitality

Responsibilities include, but are not limited to, the following:

- Development of Avista's public participation strategy for ongoing and future CETA-related initiatives as well as implementation of said strategy.
- Development and facilitation of drafting the biennial CEIP updates required per WAC 480-100-640(11).
- Development and facilitation of drafting future CEIPs per WAC 480-100-640.
- Coordination of community engagement, outreach, and communication as it relates to CETA and the CEIP.
- Coordination of solution development for projects, programs, and initiatives to support the Company's CBIs outlined in the CEIP.
- Tracking and presentment of CBIs.
- Facilitation of drafting other required CETA reports due to the Commission and/or Department of Commerce.

2. CETA Analyst

Department: Power Supply Operations

Responsibilities include supporting of the following tasks and work completed by the Resource Planning team:

- Integrated Resource Plan (IRP) Workplan – due no later than 15 months prior filing of an IRP per WAC 480-100-625(2).
- Electric IRPs – due in Washington every four years on January 1st beginning in 2021 per WAC 480-100-625(1).
- Electric IRP two-year progress report – due every two years following the filing of an IRP on January 1st per WAC 480-100-625(4). For Avista, it still must develop a full IRP every two years due to filing requirements in Idaho.
- CEAP – due every four years on January 1st as part of the IRP per WAC 480-100-625(12).
- CEIP – due every four years on October 1st beginning in 2021 per WAC 480-100-640(1).
- Biennial CEIP update – due on or before November 1st of each odd-numbered year that the utility does not file a CEIP per WAC 480-100-640(11).
- CEIP Public Participation Plan – due on or before May 1st of each odd numbered year per WAC 480-100-655(2).
- Clean energy compliance report – due every four years beginning July 1, 2026 per WAC 480-100-650.
- Annual clean energy progress report – due on or before July 1st of each year beginning in 2023, other than a year in which the clean energy compliance report is due per WAC 480-100-650(3).

3. Distribution Planning Engineer

Department – System Planning

Responsibilities include, but are not limited to, the following:

- Support of the Company’s IRP as CETA added new requirements for what is included in the IRP, specifically as it relates to the inclusion of assessments of a variety of distributed energy resources.
- Support of the Company’s CEAP and CEIP as it relates to distributed energy resources.
- Support of the Company’s “10-year plan for distribution investments and an analysis of nonwires alternatives for major transmission and distribution investments” as required by RCW 19.280.100(2)(e).
- Support of the Company’s planned Distribution Planning Advisory Group, which will fulfil the requirement of RCW 19.280.100(2)(e) related to “The distribution system investment planning process should utilize a transparent approach that involves opportunities for stakeholder input and feedback.”
- Support of routine distribution planning activities.

b) As described in Company witness Mr. Bonfield’s testimony Exh SJB-1T at 38-39:

Q. Why has the Company experienced a need for incremental labor due to CETA?

A. CETA has had, and will continue to have, far reaching effects across our business. Beginning in 2021 Avista filed its first ever Clean Energy Action Plan¹ (CEAP) and Clean Energy Implementation Plan² (CEIP). The CEIP laid out proposed CBIs and the Company’s implementation plans of specific actions it will take during 2022-2025 to comply with CETA. The proposed CBIs are a result of a public participation process including all advisory groups, customers and the newly EAG. Throughout the implementation plan, the Company will continue to solicit input from these

¹ Docket UE-200301.

² Docket UE-210804.

groups on a variety of issues. There is an ongoing need to reach additional customers including “outreach and education serving vulnerable populations and highly impacted communities”³ which will require additional resources. In addition, the proposed CBIs will require ongoing analysis, tracking, and reporting internally and externally.

From a resource planning perspective, the requirements of CETA in the Company’s electric Integrated Resource Plan (IRP) and associated reporting has increased, creating the need for an additional analyst to support the work. From a system planning perspective, the focus on Distribution Planning and Distributed Energy Resources within in CETA and the Company’s CEIP has created additional work for our system planners. Finally, CETA requires broad customer outreach and engagement in developing and implementing its CEIP. This additional work has required the Company to hire a Customer Engagement Manager to help create a strategic customer outreach and engagement plan and then to implement the plan.

Regarding the Customer Engagement Manager’s responsibilities, the list of responsibilities and requirements above are all new or incremental to work that was required previously. During development of the Company’s first CEIP, Avista’s existing labor resources were utilized to develop its CEIP. However, the level of workload required for the development is not reasonable or sustainable on a long-term basis. With more experience and understanding of the requirements of CETA, the Community Engagement Manager will play a critical role in the Company’s compliance with CETA.

Regarding the CETA Analyst, CETA has required a significant increase in the analytical work performed by our Resource Planning team that supports the Company’s electric IRPs, CEAP, CEIP, and various other reporting and compliance obligations. These new requirements have increased the workload for existing employees, in addition to their current responsibilities. The new workload is not sustainable on a long-term basis. While some of the requirements listed above were required prior to the enactment of CETA, such as the IRP work plan and IRP, the requirements for what must be included in an IRP have grown substantially. This new body of work is in addition to other responsibilities the Resource Planning team has, such as, general rate case support, Energy Independence Act reporting, energy & emissions intensity reports, providing analytical support for resource acquisitions, preparing economic evaluations of electric resource alternatives, and analyzing and modeling Avista thermal, hydroelectric, and contract resources. To perform this work successfully and to manage an ever-increasing workload for existing employees, which has not been sustainable, it is critical for the Resource Planning team to hire a new CETA Analyst to manage the CETA related work.

Regarding the Distribution Planning Engineer, due to the requirements listed above, the workload within the System Planning department has increased greatly, such that the existing employees do not have the bandwidth to take on the new responsibilities.

³ WAC 480-100-655(2).