

**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-22

Schedules A–C: Public Counsel Project/Program Variance Analysis of 2022–2024
Forecasted Capital Additions vs. 2019–2021 Average

July 29, 2022

SCHEDULE A

	A	B	C	D	E	F	G	H	I	J	K	L	M	N
1	Avista Corporation													Exhibit SC-22
2	System Transfers to Plant (TTP) by Business Case (2022 Budgeted TTP vs. 2019-2021 Average)													Schedule A
3	Docket Nos. UE-220053 & UG-220054													
			Actual TTP				Forecasted TTP							
4	Business Case	Reoccurring? ^[2]	2018 Actual TTP (System)	2019 Actual TTP (System)	2020 Actual TTP (System)	2021 Actual TTP (System)	2022 Forecasted TTP (System)	2023 Forecasted TTP (System)	2024 Forecasted TTP (System)	2021 Budgeted TTP (System)	2019 - 2021 Average	Variance vs. 3-Yr	2022 Variance %	
136	Upper Falls Trash Rake Replacement	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	
137	Washington Advanced Metering Infrastructure Project	N	\$ 33,868,858	\$ 52,793,010	\$ 28,711,359	\$ 2,986,858	\$ -	\$ -	\$ -	\$ 6,815,471	\$ 28,163,742	\$ (28,163,742)		
138	Westside 230/115kV Station Brownfield Rebuild Project	N	\$ 9,559,989	\$ 650,861	\$ (634,812)	\$ 8,339,334	\$ -	\$ -	\$ 8,924,475	\$ -	\$ 2,785,128	\$ (2,785,128)		
139	Total		#####	\$ 349,095,718	\$ 369,075,898	\$ 417,630,588	\$ 449,877,418	\$ 445,376,581	\$ 435,057,163	#####	\$351,748,213	\$ 71,276,683	20%	
140	Source: PC-DR-208 Attachment A													
142	[1] Customer Experience Platform Program includes "Strategic Initiatives" TTP in 2020 & 2021.													
143	[2] For purposes of responding to this data request, the Company has defined reoccurring (programmatic in nature) as business cases that have transfers to plant occurring annually each year from 2021-2024, which is the period of TTP included in this case. In column B "Reoccurring?", "Y" = Yes, reoccurring/programmatic in nature and "N" = No, non-reoccurring (i.e. discreet).													
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146	Please note, the analysis above does not contain TTP information related to the Colstrip Units 3 & 4 business case. See Staff-DR-123 for more information.													

SCHEDULE B

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136	Upper Falls Trash Rake Replacement	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500,000	\$ -	\$ -	\$ -	\$ 1,500,000	\$ -	
137	Washington Advanced Metering Infrastructure Project	N	\$ 33,868,858	\$ 52,793,010	\$ 28,711,359	\$ 2,986,858	\$ -	\$ -	\$ -	\$ 6,815,471	\$ 28,163,742	\$ (28,163,742)		
138	Westside 230/115kV Station Brownfield Rebuild Project	N	\$ 9,559,989	\$ 650,861	\$ (634,812)	\$ 8,339,334	\$ -	\$ -	\$ 8,924,475	\$ -	\$ 2,785,128	\$ (2,785,128)		
139	Total		#####	\$ 349,095,718	\$ 369,075,898	\$ 417,630,588	\$ 449,877,418	\$ 445,376,581	\$ 435,057,163	#####	\$351,748,213	\$ 66,775,846	19%	
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SCHEDULE C

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2	Exhibit SC-22														
3	Schedule C														
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7	Business Case	Reoccurring?	2018 Actual TTP (System)	2019 Actual TTP (System)	2020 Actual TTP (System)	2021 Actual TTP (System)	2022 Forecasted TTP (System)	2023 Forecasted TTP (System)	2024 Forecasted TTP (System)	2021 Budgeted TTP (System)	2019 - 2021 Average	Variance vs. 17-45	2024 3-Yr	Variance %	
70	Transmission - Minor Rebuild	Y	\$ 586,929	\$ 3,971,001	\$ 1,674,541	\$ 4,331,179	\$ 3,400,375	\$ 3,343,418	\$ 3,343,419	\$ 3,343,428	\$ 3,325,574	\$ 17,845	\$ 8,500,000	101%	
71	Transmission - Performance & Capacity ⁽³⁾	Y	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,500,000	\$ -	\$ -	\$ 8,500,000	\$ 8,500,000	-42%	
72	Transmission Major Rebuild - Asset Condition	Y	\$ 7,760,684	\$ 314,005	\$ -	\$ 16,128,097	\$ 5,680,751	\$ 12,000,000	\$ 11,000,000	\$ 17,900,000	\$ 5,480,701	\$ 5,519,299	\$ 5,519,299	36%	
73	Tribal Permits & Settlements	Y	\$ 87,307	\$ 1,251,484	\$ -	\$ 43,395	\$ 259,776	\$ 249,996	\$ 249,996	\$ -	\$ 431,626	\$ (181,630)	\$ (181,630)	-42%	
74	Use Permits	Y	\$ -	\$ -	\$ 126,396	\$ 203,901	\$ 150,012	\$ 150,012	\$ 150,012	\$ 50,004	\$ 110,099	\$ 39,913	\$ 39,913	36%	
75	Wildfire Resiliency Plan	Y	\$ -	\$ -	\$ 3,206,894	\$ 18,369,323	\$ 24,544,986	\$ 27,000,000	\$ 29,000,001	\$ 17,117,355	\$ 7,192,073	\$ 21,807,928	\$ 21,807,928	303%	
76	Wood Pole Management	Y	\$ 10,999,184	\$ 10,369,759	\$ 10,275,278	\$ 14,588,071	\$ 12,999,996	\$ 12,999,996	\$ 12,999,996	\$ 15,739,332	\$ 11,744,370	\$ 1,255,626	\$ 1,255,626	11%	
77	WSDOT Control Zone Mitigation	Y	\$ -	\$ -	\$ -	\$ 408,317	\$ 749,998	\$ 1,200,005	\$ 1,399,999	\$ 999,999	\$ 136,106	\$ 1,263,893	\$ 1,263,893	929%	
78	WSDOT Franchises	Y	\$ -	\$ -	\$ 2,531,162	\$ 505	\$ 99,996	\$ 99,996	\$ 99,996	\$ 237,084	\$ 843,889	\$ (743,893)	\$ (743,893)	-88%	
79	Apprentice/Craft Training	N	\$ 136,695	\$ 1,890	\$ 43,920	\$ 45,004	\$ -	\$ -	\$ -	\$ 61,677	\$ 30,271	\$ (30,271)	\$ (30,271)	-	
80	Boulder Park Generator Replacement	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 999,998	\$ -	\$ -	\$ 999,998	\$ 999,998	-	
81	Cabinet Gorge 15 kV Bus Replacement	N	\$ -	\$ -	\$ 396,721	\$ 411,049	\$ -	\$ -	\$ -	\$ -	\$ 269,257	\$ (269,257)	\$ (269,257)	-	
82	Cabinet Gorge Dam Fishway	N	\$ -	\$ -	\$ 54,207	\$ (54,207)	\$ 63,475,101	\$ 235,000	\$ -	\$ -	\$ 0	\$ (0)	\$ (0)	(0)	
83	Cabinet Gorge HVAC Replacement	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	-	
84	Cabinet Gorge Station Service	N	\$ -	\$ -	\$ -	\$ -	\$ 7,761,859	\$ 5,152,936	\$ -	\$ -	\$ -	\$ -	\$ -	-	
85	Cabinet Gorge Stop Log Replacement	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,200,000	\$ -	\$ -	\$ -	\$ -	\$ -	-	
86	Cabinet Gorge Unit 3 Protection & Control Upgrade	N	\$ -	\$ -	\$ -	\$ 3,073,449	\$ -	\$ -	\$ -	\$ 2,818,081	\$ 1,024,483	\$ (1,024,483)	\$ (1,024,483)	-	
87	Cabinet Gorge Unit 4 Protection & Control Upgrade	N	\$ -	\$ -	\$ -	\$ -	\$ 750,000	\$ -	\$ -	\$ 2,831,852	\$ -	\$ -	\$ -	-	
88	Cabinet Gorge Unwatering Pumps	N	\$ -	\$ -	\$ -	\$ -	\$ 395,000	\$ 395,016	\$ -	\$ -	\$ -	\$ -	\$ -	-	
89	Central 24 HR Operations Facility	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,598,545	\$ -	\$ -	\$ 4,598,545	\$ 4,598,545	-	
90	Control and Safety Network Infrastructure	N	\$ -	\$ -	\$ -	\$ -	\$ 1,324,039	\$ 1,282,468	\$ 1,485,787	\$ -	\$ -	\$ 1,485,787	\$ 1,485,787	-	
91	Coyote Springs LTSA	N	\$ -	\$ 44,858	\$ -	\$ 15,898,972	\$ -	\$ -	\$ -	\$ -	\$ 5,314,610	\$ (5,314,610)	\$ (5,314,610)	-	
92	CS2 Single Phase Transformer	N	\$ -	\$ -	\$ 2,847,790	\$ 17,052,904	\$ -	\$ -	\$ -	\$ 18,800,848	\$ 6,633,565	\$ (6,633,565)	\$ (6,633,565)	-	
93	Distribution Transformer Change Out Program	N	\$ 2,064,151	\$ 995,659	\$ 170,931	\$ 107,443	\$ -	\$ -	\$ -	\$ 399,996	\$ 424,678	\$ (424,678)	\$ (424,678)	-	
94	Energy Delivery Operational Efficiency & Shared Services	N	\$ 1,973,649	\$ 5,187,210	\$ 3,300,317	\$ 648,749	\$ -	\$ -	\$ -	\$ 388,925	\$ 3,045,425	\$ (3,045,425)	\$ (3,045,425)	-	
95	Energy Imbalance Market	N	\$ -	\$ -	\$ 2,832,327	\$ 10,584,930	\$ 12,016,376	\$ -	\$ -	\$ 9,576,711	\$ 4,472,419	\$ (4,472,419)	\$ (4,472,419)	-	
96	Energy Imbalance Market Modernization & Operational Efficiency	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 499,974	\$ 585,791	\$ -	\$ -	\$ 585,791	\$ 585,791	-	
97	Enterprise Data Science	N	\$ -	\$ 1,437,251	\$ 1,299,169	\$ 21,497	\$ -	\$ -	\$ -	\$ -	\$ 919,306	\$ (919,306)	\$ (919,306)	-	
98	Enterprise Network Infrastructure	N	\$ -	\$ -	\$ -	\$ -	\$ 2,235,285	\$ 2,341,928	\$ 1,544,361	\$ -	\$ -	\$ 1,544,361	\$ 1,544,361	-	
99	Gas Airway Heights HP Reinforcement	N	\$ -	\$ -	\$ -	\$ -	\$ 9,634,502	\$ -	\$ -	\$ 2,999,743	\$ -	\$ -	\$ -	-	
100	Gas Cheney HP Reinforcement	N	\$ -	\$ 3,048,353	\$ 4,944,134	\$ 2,834,650	\$ -	\$ -	\$ -	\$ 3,099,608	\$ 3,609,046	\$ (3,609,046)	\$ (3,609,046)	-	
101	Gas HP Pipeline Remediation Program	N	\$ 4,952	\$ 0	\$ -	\$ 702,918	\$ 599,998	\$ -	\$ -	\$ 699,752	\$ 234,306	\$ (234,306)	\$ (234,306)	-	
102	Gas Operator Qualification Compliance	N	\$ -	\$ 248,710	\$ 34,123	\$ 28,045	\$ -	\$ -	\$ -	\$ 65,074	\$ 103,626	\$ (103,626)	\$ (103,626)	-	
103	Gas Overbuilt Pipe Replacement Program	N	\$ 85,263	\$ 755,731	\$ 206,215	\$ 158,171	\$ -	\$ -	\$ -	\$ 459,747	\$ 373,372	\$ (373,372)	\$ (373,372)	-	
104	Gas Pullman HP Reinforcement Project	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,400,004	\$ -	\$ -	\$ 2,400,004	\$ 2,400,004	-	
105	Generation Masonry Building Rehabilitation	N	\$ -	\$ -	\$ -	\$ -	\$ 493,993	\$ 493,995	\$ -	\$ -	\$ 493,990	\$ 493,990	\$ 493,990	-	
106	Generation Protection Upgrades	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 587,500	\$ -	\$ -	\$ 587,500	\$ 587,500	-	
107	High Voltage Protection (HVP) Refresh	N	\$ 163,122	\$ 291,477	\$ -	\$ -	\$ 226,712	\$ 336,542	\$ 190,320	\$ 358,075	\$ 97,159	\$ (97,159)	\$ (97,159)	96%	
108	Hydro Safety Minor Blanket	N	\$ 242,972	\$ -	\$ -	\$ 40,951	\$ -	\$ -	\$ -	\$ 50,004	\$ 13,650	\$ (13,650)	\$ (13,650)	-	
109	KF Fuel Yard Equipment Replacement	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 30,367,127	\$ -	\$ -	\$ -	\$ -	\$ -	-	
110	Little Falls Plant Upgrade	N	\$ 7,892,001	\$ 8,953,839	\$ 231,373	\$ 1,430,408	\$ -	\$ -	\$ -	\$ 1,450,889	\$ 3,538,540	\$ (3,538,540)	\$ (3,538,540)	-	
111	Long Lake Plant Upgrade	N	\$ 3,488,539	\$ 733,802	\$ 211,786	\$ 1,274,252	\$ -	\$ -	\$ 19,541,000	\$ 1,330,925	\$ 739,947	\$ 18,801,053	\$ 18,801,053	2541%	
112	Meter Minor Blanket	N	\$ 257,742	\$ 198,169	\$ 245,518	\$ 254,473	\$ -	\$ -	\$ -	\$ 249,996	\$ 232,720	\$ (232,720)	\$ (232,720)	-	
113	Monroe Street Abandoned Penstock Stabilization	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 899,992	\$ -	\$ -	\$ -	\$ -	\$ -	-	
114	N Lewiston Autotransformer - Failed Plant	N	\$ -	\$ -	\$ -	\$ -	\$ 5,554,506	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	
115	Network Backbone	N	\$ -	\$ -	\$ -	\$ -	\$ 188,444	\$ 3,879,878	\$ 3,686,842	\$ -	\$ -	\$ 3,686,842	\$ 3,686,842	-	
116	Nine Mile HED Battery Building	N	\$ -	\$ -	\$ -	\$ -	\$ 800,001	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	
117	Nine Mile Powerhouse Crane Rehab	N	\$ -	\$ -	\$ -	\$ -	\$ 1,699,988	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-	
118	Nine Mile Units 3 & 4 Control Upgrade	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,000,000	\$ 1,999,999	\$ -	\$ -	\$ 1,999,999	\$ 1,999,999	-	
119	Noxon Rapids HVAC	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,250,002	\$ -	\$ -	\$ 1,250,002	\$ 1,250,002	-	
120	Oil Storage Improvements	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,762,827	\$ -	\$ -	\$ -	\$ -	\$ -	-	
121	Outage Management System & Advanced Distribution Management System	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10,000,000	\$ 15,000,000	\$ -	\$ -	\$ 15,000,000	\$ 15,000,000	-	
122	Payment Card Industry Compliance (PCI)	N	\$ -	\$ 617,112	\$ 847,201	\$ 597,249	\$ -	\$ -	\$ -	\$ -	\$ 687,187	\$ (687,187)	\$ (687,187)	-	
123	Post Falls Landing and Crane Pad Development	N	\$ -	\$ -	\$ -	\$ 3,292,267	\$ -	\$ -	\$ -	\$ 3,307,656	\$ 1,097,422	\$ (1,097,422)	\$ (1,097,422)	-	
124	Post Falls North Channel Spillway Rehabilitation	N	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 18,499,999	\$ -	\$ -	\$ 18,499,999	\$ 18,499,999	-	
125	Primary URD Cable Replacement	N	\$ 637,472	\$ 813,805	\$ 164,230	\$ 35,655	\$ -	\$ -	\$ -	\$ -	\$ 337,897	\$ (337,897)	\$ (337,897)	-	
126	Protection System Upgrade for PRC-002	N	\$ -	\$ 1,165,241	\$ 0	\$ 7,121,962	\$ 80,000	\$ 11,879,164	\$ -	\$ -	\$ 2,762,401	\$ (2,762,401)	\$ (2,762,401)	-	
127	Saddle Mountain 230/115kV Station (New) Integration Project Phase 1	N	\$ 2,554,495	\$ 8,943,952	\$ 28,852,361	\$ 3,490,919	\$ -	\$ -	\$ -	\$ -	\$ 13,762,411	\$ (13,762,411)	\$ (13,762,411)	-	
128	Saddle Mountain 230/115kV Station (New) Integration Project Phase 2	N	\$ -	\$ -	\$ 1,110,656	\$ 11,210,582	\$ 19,962,533	\$ -	\$ -	\$ 11,805,060	\$ 4,107,079	\$ (4,107,079)	\$ (4,107,079)	-	
129	Spokane Smart Circuit	N	\$ (2,909)	\$ -	\$ -	\$ 550,569	\$ -	\$ -	\$ -	\$ -	\$ 183,523	\$ (183,523)	\$ (183,523)	-	
130	Spokane Valley Transmission Reinforcement Project	N	\$ -	\$ (110)	\$ -	\$ 13,683,430	\$ 2,000,000	\$ -	\$ -	\$ 13,525,820	\$ 4,561,107	\$ (4,561,107)	\$ (4,561,107)	-	
131	Strategic Initiatives	N	\$ 1,056,725	\$ 775,452	\$ 10,417,329	\$ 6,265,315	\$ 2,522,399	\$ -	\$ -	\$ 2,000,000	\$ 5,819,365	\$ (5,819,365)	\$ (5,819,365)	-	
132	Technology Refresh to Sustain Business Process	N	\$ 8,687,848	\$ 3,713,767	\$ (2,616)	\$ 812,952	\$ -	\$ -	\$ -	\$ 562,670	\$ 1,508,035	\$ (1,508,035)	\$ (1,508,035)	-	
133	Telematics 2025	N	\$ -	\$ -	\$ -	\$ 651,009	\$ 438,347	\$ 808,250	\$ -	\$ 1,100,000	\$ 217,003	\$ (217,003)	\$ (217,003)	-	
134	Transmission Construction - Compliance	N	\$ 10,845,388	\$ 5,883,218	\$ 9,539,913	\$ 2,189,745	\$ 2,111,069	\$ 1,550,000	\$ -	\$ 2,100,825	\$ 5,870,959	\$ (5,870,959)	\$ (5,870,959)	-	
135	Transmission NERC Low-Risk Priority Lines Mitigation	N	\$ 774,519	\$ 744,660	\$ 5,027,589	\$ 327	\$ 2,554,255	\$ 2,499,984	\$ -	\$ 1,023,452	\$ 1,924,192	\$ (1,924,192)	\$ (1,924,192)	-	

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139	Total		#####	\$ 349,095,718	\$ 369,075,898	\$ 417,630,588	\$ 449,877,418	\$ 445,376,581	\$ 435,057,163	#####	\$351,748,213	\$ 56,456,428	16%	
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