

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

**AARON TAM  
ON BEHALF OF THE  
WASHINGTON STATE OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL UNIT**

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**EXHIBIT AT-16**

Avista's Response to Public Counsel Data Request No. 211

July 29, 2022

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/17/2022
CASE NO.:	UE-220053 & UG-220054	WITNESS:	Justin Baldwin-Bonney
REQUESTER:	Public Counsel	RESPONDER:	K. Schultz / T. Benjamin
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 211	TELEPHONE:	(509) 495-2482
		EMAIL:	kaylene.schultz@avistacorp.com

**SUBJECT: Capital Additions 2021, TY1 and TY2**

**REQUEST:**

**RE: Capital Additions 2021, TY1 and TY2, Justin A. Baldwin-Bonney, Exh JBB-3 at 5–7.**

For each project or program that repeats annually in the amount of \$1.0 million or greater in 2022–2024, please provide the following information in Excel:

- a. Expand the schedules to include historical amounts spent in each year 2019 through 2021.
- b. Provide the average amount spent for the three years 2019–2021.
- c. Explain any increase of 10 percent or greater between each forecasted year and the 3-year average, and provide the amount related to each reason for the variance.
- d. Provide the basis for each annual forecasted amount.
- e. Provide the number of units, quantities, or other data supporting the capital additions for each year 2019 through 2024. Provide the basis for each annual forecast of units, quantities or other supporting data

**RESPONSE:**

- a. Please see PC-DR-208 Attachment A for transfers-to-plant (TTP) on a system basis by Business Case as contained in Exh. JBB-3 for the period of 2018-2024 (actuals for 2018-2021, forecasted for 2022-2024). The Colstrip 3 & 4 Capital Projects Business Case is not included in this analysis. Please see Staff-DR-123 for more information regarding Colstrip.
- b. The average of TTP for the three years 2019-2021 can be derived by Public Counsel from the data provided in PC-DR-208 Attachment A. Please note, the Company bases its determination of rate base included in this case off TTP (when the Business Case is or intended to be in-service and used and useful), rather than spend.
- c. As noted in part b above, calculating the variance on a dollar and percent basis between each forecasted year and the 3-year average of 2019-2021 on a system basis can be done by Public Counsel by using the data as provided in PC-DR-208 Attachment A. If more particular information on variances is requested for a specific Business Case or set of Business Cases among the list of Business Cases (134 Business Cases in total over the period 2021-2024) in PC-DR-208 Attachment A for the years provided, please advise.
- d. For an overview of the Company’s capital planning process – from the need/requirement for a capital investment through the approval of the capital (in aggregate) by the Company’s Board of Directors, please see Mr. Ehrbar’s direct testimony, Exh. PDE-1T, Section II. Capital Budgeting & Expenditures, beginning on page 2.

To the extent available, the basis for the capital investment, either on an annual or total cost basis, is typically included in the Business Case. Please note, the Business Case generally includes spend, and as mentioned in part b. above, the Company uses TTP as the basis for determining rate recovery.

Please see the associated Business Case located in one of the following: Exh. JRT-4, Exh. HLR-2, Exh. JMK-2, Exh. KEM-2, Exh. SJK-2, and Exh. DRH-4. Mr. Baldwin-Bonney's Exh. JBB-3 provides a listing of the Business Cases by name and includes a reference to the capital witness's testimony that sponsors the Business Case. Please also refer to Staff-DR-121 Attachment A for references, including page numbers, to the related testimony and Business Case exhibits by Business Case included in this case.

- e. Please refer to the Business Case for supporting documentation. Refer to part d. above for cross-references of the capital witness and where to locate the individual Business Cases for TTP occurring in years 2021-2024. For Business Cases that support capital additions for 2018-2020 (actual TTP that was deemed prudent and in-service, per Final Order 08 / 05), please see PC-DR-208 Attachments B-F that were previously provided in Dockets UE-200900, UG-200901 and UE-200894 (*consolidated*).