

July 25, 2014

Public Utility Commission of Oregon Attention: Filing Center 3930 Fairview Industrial Drive SE Salem, OR 97302

RE: Docket No: UM 1497

Pursuant to ORS 757.259 and OAR 860-027-300(4), Avista Utilities submits an original and three (3) copies of its Application for Reauthorization to utilize deferred accounting for Purchase Gas Cost differences.

Avista seeks, with this application, to receive reauthorization of these deferrals for the twelve month period beginning November 1, 2014 and ending October 31, 2015.

Please direct any questions regarding this order request to Patrick Ehrbar at (509) 495-8620 or Ryan Finesilver at (509) 495-4873.

Sincerely,

David J. Meyer, Esq., Vice President and Chief Counsel

for Regulatory and Governmental Affairs

Enclosure

Cc: Certificate of Service

## CERTIFICATE OF SERVICE

W Bob Jenks

Catriona McCracken

Nadine Hanhan

I HEREBY CERTIFY that I have this day served Avista Corporation's Application for an Order Reauthorizing Deferral Accounting for the Company's Purchase Gas Cost differences upon the parties listed below by mailing a copy thereof, postage prepaid and/or by electronic mail.

- W Chad Stokes Tommy A. Brooks Cable Huston Benedict Haagensen & Lloyd, LLP 1001 SW 5th, Suite 2000 Portland, OR 97204-1136
  - Citizens' Utilities Board 610 SW Broadway, Suite 400 Portland, OR 97205-3404 cstokes@cablehuston.com Bob@OregonCUB.org tbrooks@cablehuston.com dockets@oregoncub.org Nadine@oregonCUB.org catriona@OregonCUB.org
- W Keith Kueny Community Action Partnership of Oregon PO Box 7964 Salem, OR 97303 keith@caporegon.org
- W Ed Finklea **Executive Director** Northwest Industrial Gas Users 326 Fifth St. Lake Oswego, OR 97034 efinklea@nwigu.org
- W Deborah Garcia Public Utility Commission 3930 Fairview Industrial Drive SE Salem, OR 97302 deborah.garcia@state.or.us
- W Jason W. Jones Assistant Attorney General 1162 Court St. NE Salem, OR 97301-4096 jason.w.jones@state.or.us

I declare under penalty of perjury that the foregoing is true and correct.

Dated at Spokang, Washington this 25<sup>th</sup> day of July 2014.

Patrick Ehrbar

Manager, Rates and Tariffs

1	BEFORE THE PUBLIC UTILITY COMMISSION	
2	OF OREGON	
3	Docket No: UM 1497	
4 5 6 7 8 9	IN THE MATTER OF THE APPLICATION OF AVISTA UTILITIES FOR AN ORDER REAUTHORIZING DEFERRAL OF CERTAIN COSTS RELATED TO PURCHASED GAS COSTS DIFFERENCES  ) NOTICE OF APPLICATION ) FOR REAUTHORIZATION ) OF CERTAIN DEFERRAL ) ACCOUNTS	
10	Avista Utilities ("Avista" or "Company") pursuant to ORS 757.259 and OAR 860-027-	
11	0300(4) applies to the Public Utility Commission of Oregon ("Commission") for an order	
12	reauthorizing it to utilize deferred accounting for Purchased Gas Cost differences. The	
13	Company respectfully requests that the reauthorization become effective November 1, 2014.	
14	In support of this Application, the Company states:	
15	Avista provides natural gas service in southwestern and northeastern Oregon and is a	
16	public utility subject to the Commission's jurisdiction under ORS 757.005(1)(a)(A).	
17	Avista requests that all notices, pleadings and correspondence regarding this filing be	
8	sent to the following:	
19 20 21 22 23 24 25 26	Patrick Ehrbar Manager, Rates and Tariffs Avista Corporation P.O. Box 3727 1411 E. Mission, MSC-27 Spokane, WA 99220-3727 (509) 495-8620  David J. Meyer, Esq. Vice President and Chief Counsel for Regulatory and Governmental Affairs P.O. Box 3727 1411 E. Mission, MSC-27 Spokane, WA 99220-3727 (509) 495-4316	
28	This Application is filed pursuant to ORS 757.259, which empowers the Commission	
29	to authorize the deferral of expenses or revenues of a public utility for later incorporation into	
30	rates	

BACKGROUND
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Deferral of Purchased Gas Cost differences was previously authorized, effective November 1, 2013 by Order No. 13-357.

## **DESCRIPTION OF EXPENSES**

Currently the Company accumulates Purchased Gas Cost differences in two sub-accounts of FERC account number 191, namely account number 191909 and account number 191910. Account number 191909 is used to record the commodity portion of Purchased Gas Cost differences and account number 191910 is used to record the demand portion. After the Commission determines these costs were prudently incurred, these differences are included in the Company's annual Purchased Gas Cost Adjustment (PGA) filing for refund or surcharge to customers.

Due to the volatility of the price of natural gas purchased and transported for customer use, the associated costs are difficult to establish with any degree of certainty. This volatility makes the use of deferred accounting extremely important.

It is appropriate that deferred accounting be reauthorized for the Purchased Gas Cost differences for the same reasons that originally established the PGA mechanism. Namely, deferred accounting minimizes both the frequency of rate changes and the fluctuation of rate levels pursuant to subsection (2)(C) of ORS 757.259.

## PROPOSED ACCOUNTING

The commodity portion of Purchased Gas Cost differences includes the actual cost of purchasing natural gas, the variable cost of transporting the gas from the supply basins to the

1	citygate, the benefits received from storage optimization, off-system sales and other	
2	miscellaneous costs or benefits. These costs are compared with the actual commodity costs	
3	collected from customers, with 90% of the difference recorded monthly to account number	
4	191909.	
5	The demand portion of the Purchased Gas Cost differences includes fixed pipeline costs,	
6	capacity releases and miscellaneous pipeline related refunds or surcharges. These costs are	
7	compared with the actual demand costs collected from customers and the difference is recorded	
8	monthly to account number 191910.	
9	Interest is calculated on the average net balance and included in the deferral accounts.	
10	CURRENT DEFERRAL BALANCES	
11	As of June 30, 2014, the outstanding balances for the Purchased Gas Cost deferral	
12	accounts are:	
13 14	Account 191909, Commodity Deferrals \$ 3,487,902 Account 191910, Demand Deferrals \$ 2,183,433>	
15 16	Total \$1,304,469	
17 18	Avista seeks with this application to receive reauthorization of the use of sub-accounts of	
19	FERC Account No. 191 to account for the Company's Purchased Gas Cost differences for the	
20	12 month period, November 1, 2014 through October 31, 2015.	
21	This Application will have no effect on Company revenue or customer rates. A copy of	
22	the Company's reauthorization request has been provided to all of the parties in Avista's last	
23	general rate case, pursuant to OAR 860-027-0300(6), as shown on the Certificate of Service.	
24	WHEREFORE, Avista Utilities respectfully requests that the Commission reauthorize the	
25	Company to defer the costs described in this Application.	
26	DATED this 25th day of July 2014.	

1	Respectfully submitted,
2	Avista Utilities
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4	
5	By:
6 7	David J. Meyer, Esq., Vice President and Chief Counsel for Regulatory and Governmental Affairs