



**Avista Corp.**

1411 East Mission P.O. Box 3727  
Spokane, Washington 99220-0500  
Telephone 509-489-0500  
Toll Free 800-727-9170

**VIA ELECTRONIC FILING**

March 28, 2014

Public Utilities Commission of Oregon  
Attn: Filing Center  
550 Capital St N.E. Suite 215  
Salem, Oregon 97308-2148

RE: Avista Initial Response to Docket No. AR 578

Avista Corporation, dba Avista Utilities or (“Avista” and/or the “Company”), appreciates the opportunity to provide comments on the proposed Public Utilities Commission of Oregon (“Commission”) administrative rules relating to due dates for certain energy utility reports found within OAR 860-027-0005, -0015, -0045, and -0070.

The Company supports the Commission’s efforts to update the due dates within these rules as the data needed for the certain specified reports is not available when the reports are currently due. Regarding the proposed changes to the rules mentioned above the Company submits the following comments.

**OAR 860-027-0005 – Utilities Required to File Reports and OAR 860-027-0015 – New Construction Budget**

The current language of OAR 860-027-0005 requires utilities operating in Oregon and having gross operating revenues of \$50,000 or more per year to file a Budget of Expenditure with the commission on or before the first day of November each year.

The current language of OAR 860-027-0005 requires utilities operating in Oregon to file annually on or before December 31<sup>st</sup> each year a new Construction Budget for the current year.

Both of the reports specified in these rules are based on the approval of the Company's capital budget, which is not completed and approved by the current due dates of the reports. Because the Company has been unable to meet the required deadlines it has routinely filed for a waiver of the filing deadlines and an extension of the due date to March 31<sup>st</sup> of the following year, which it has been granted.

The proposed revisions to these rules removes the current due dates of the reports and requires the utilities to notify the Commission in writing, no later than December 1, of the date the Company plans to file its Budget of Expenditures and New Construction Budget. Rather than require the utility to provide these notifications each year, Avista recommends the Commission maintain specific due dates within the rules.

As Idaho Power pointed out in their comments filed on March 20<sup>th</sup> in this rulemaking, in 2013 six utilities requested an extension of the filing dates required in OAR 860-027-0005 and -0015. This practice by the utilities is an indicator that the current filing due dates need to be changed to a later date. Instead of the proposed revisions included in the Notice of the Proposed Rulemaking, Avista supports a due date in the rule that allows enough time to submit the reports without asking for a waiver of the due date. For this reason Avista proposes the following language:

**OAR 860-027-0005 – Utilities Required to File Reports**

Each energy utility operating within Oregon and having gross operating revenues of \$50,000 or more per annum is required to file with the Commission on or before **March 31** each year, a copy of its proposed Budget of Expenditures, on forms approved by the commissions.



**OAR 860-027-0015 – New Construction Budget**

Each energy utility operating within Oregon is required to file annually on or before **March 31** of each year, on forms approved by the Commission, information on new construction, extensions, and additions of the utility's property.

**OAR 860-027-0045 – Uniform System of Accounts for Electric Utilities**

The Company does not have any comments related to the proposed changes to this rule as it only applies to electric utilities.

**OAR 860-027-0027 – Annual Reports for Electric, Gas, Steam Heat, and Large Telecommunications Utilities**

This rule is specific to annual FERC reports the Company must file. The Company supports the proposed revisions to this rule as the financial data needed to complete the FERC reports is not typically available by April 1<sup>st</sup>. Moving the due date to May 1<sup>st</sup> should allow the Company enough time to complete the reports by the required due date.

Thank you for the opportunity to provide comments related this rulemaking. If you have any questions regarding this response please contact Shawn Bonfield at (509) 495-2782.

Sincerely,

*/s/Linda Gervais/*

Manager, Regulatory Policy  
Avista Utilities  
(509) 495-4975  
linda.gervais@avistacorp.com

