

PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
PUBLIC MEETING DATE: October 19, 2015

REGULAR CONSENT EFFECTIVE DATE November 1, 2015

DATE: October 5, 2015

TO: Public Utility Commission

FROM:  Lisa Gorsuch

THROUGH:  Jason Eisdorfer and  Aster Adams

SUBJECT: AVISTA UTILITIES: (Docket No. UG 289/Advice No. 15-04-G) Reflects changes in the cost of purchased gas and the amortization rate for the Purchased Gas Adjustment (PGA) balancing account.

ISSUE AND STAFF RECOMMENDATION:

Should the Commission approve Avista Corporation, dba Utilities' (Avista or Company) 2015 annual Purchase Gas Adjustment (PGA) clause filings? For the following reasons, Staff recommends that the Company's proposed tariff sheets in Docket No. UG 289/Advice No. 15-04-G be approved with an effective date of November 1, 2015.

APPLICABLE LAW

Avista makes its PGA filing pursuant to ORS 757.259(2)(e), OAR 860-027-0300(4) and Commission Order No. 14-238 [Docket No. UM 1286(3)]. ORS 757.259(2)(e) and OAR 860-027-0300(4) allow the Commission to authorize deferred accounting treatment for Avista's PGA filing. The PGA mechanism was originally established by Order No. 89-1046 to minimize the frequency of gas cost-related rate changes and the fluctuation of rate levels pursuant to ORS 757.259(2)(e). Since the mechanism's creation in 1989, the Commission has issued a series orders concerning PGA filings through open-docket UM 1286.¹ Order No. 14-238 is the most recent of these orders which set out the Commission's procedures and requirements concerning the processing of PGA filings.

¹ PGA Guidelines were acknowledged by the Commission in Docket No. UM 1286, Order No. 09-248, on June 23, 2009. The guidelines in Docket No. UM 1286 have been modified three different times since they were first acknowledged by the Commission, in Order No. 10-197, in Order No. 11-196, and in Order No. 14-238.

ANALYSIS:

On July 31 and September 10, 2015, Avista submitted its annual PGA filings, which respectively comprise its initial filing (Initial 2015 PGA Filing)² and its supplemental filing (Supplemental 2015 PGA Filing).³ In aggregate, the filings are commonly referred to as the 2015 PGA filing (2015 PGA Filing). The 2015 PGA Filing comprises two parts: a forward-looking part (Projected Purchased Gas Cost for the 2015-2016 Gas Year) and a backward-looking part (True-Up of the 2014-2015 Gas Year).

The Projected Purchased Gas Cost for the 2015-2016 Gas Year projects the costs of natural gas for the upcoming gas year (i.e., 2015-2016 Gas Year)⁴ and results in the new rates set forth in Tariff Sheet 461.⁵ The True-Up of the 2014-2015 Gas Year trues up the costs of natural gas in the previous gas year (2014-2015 Gas Year)⁶ by comparing the amount collected from customers in that year with the actual costs incurred by the Company in the same year. Any over- or under-collection from customers in the 2014-2015 Gas Year, together with any over- or under-collection from previous years,⁷ is given back (in the case of over-collection) or surcharged (in the case of under-collection) to customers in the upcoming gas year. The True-Up of the 2014-2015 Gas Year results in the new rates set forth in Tariff Sheet 462.⁸

Projected Purchased Gas Cost for the 2015-2016 Gas Year (Tariff Sheet 461 or Rate Schedule 461).

The Projected Purchased Gas Cost for the 2015-2016 Gas Year comprises two rate components: 1) the commodity component rate and 2) the capacity or demand component rate. The rates for those components in \$ per therm are represented in Table 1.

² See <http://edocs.puc.state.or.us/efdocs/UAA/ug289uaa85858.pdf>

³ See <http://edocs.puc.state.or.us/efdocs/UAC/ug289uac83055.pdf>

⁴ The 2015-2016 Gas Year covers the period beginning on November 1, 2015, and ending on October 31, 2016.

⁵ Tariff Sheet 461 is titled "Purchased Gas Cost Adjustment Provision."

⁶ The 2014-2015 Gas Year covers the period beginning on November 1, 2014, and ending on October 31, 2015. However, per page 10 of Appendix A to Order No. 14-238 in Docket No. UM1286 (See: <http://apps.puc.state.or.us/orders/2014ords/14-238.pdf>), all deferrals to be amortized into rates will be based on June deferral balances plus interest for July-October, and the deferrals that occur after June will be carried forward to the next PGA period.

⁷ Any over-collection or under-collection from previous years is the result of the fact that actual volumetric sales of natural gas will always be different from forecasted volumetric sales. Since amortizations are intended to be recovered in volumetric forecasted sales, a remaining balance will always be present.

⁸ Tariff Sheet 462 is titled "Gas Cost Rate Adjustment."

Table 1: Projected Purchased Gas Cost for 2015-2016
 (in \$/Therm or as noted otherwise)

Item		Current Rate 2014-2015 Gas Year	Proposed Rate 2015-2016 Gas Year	Change
Commodity	(A)	0.41155	0.27342	-0.13813
Demand	(B)	0.20914	0.19906	-0.01008
Total Gas Cost	(C = A+B)	0.62069 ⁹	0.47248 ¹⁰	-0.14821

Regarding the commodity component, the primary reason for the 13.8 cents per therm rate decrease of this component is that the winter of 2014-2015 resulted in an increase in natural gas supply coupled with an overall reduction in customer demand. The winter of 2014-2015 was significantly warmer than normal, leading to lower customer demand, which led to reduced wholesale natural gas prices in the winter and spring. The downward pressure on wholesale prices has continued even after the winter period due to the abundance of natural gas in storage and continued high natural gas production levels.

As for the demand component,^{11, 12} the Company is proposing only a slight rate decrease of approximately 0.1 cents per therm. The new rates for TransCanada-Gas Transmission Northwest, which will go into effect January 1, 2016, were included in the Company's filing.¹³

Avista's 2014 PGA Filing meets the PGA Filing Guidelines and the Natural Gas Portfolio Guidelines.¹⁴ Avista has demonstrated its adherence to these guidelines with regard to

⁹ See the Supplemental Eight Revision Sheet 461 issued on September 12, 2014, "Rate" section (See http://www.avistautilities.com/services/energypricing/or/curgas/Documents/OR_461.pdf approved by the Public Utility Commission of Oregon in Order No. 14-373 of Docket No. UG 267 at <http://edocs.puc.state.or.us/efdocs/UBA/ug267uba11711.pdf>).

¹⁰ See the Supplemental Ninth Revision Sheet 461 attached to Avista's Supplemental 2015 PGA Filing, "Rate" section, at <http://edocs.puc.state.or.us/efdocs/UAC/ug289uac83055.pdf>.

¹¹ Demand costs reflect the cost of pipeline transportation to the Company's system, as well as fixed costs associated with natural gas storage.

¹² Schedule 440 Interruptible Customers is the rate schedule to which this rate does not apply. Interruptible customers are customers under the Interruptible Natural Gas Schedule 440. This rate schedule is applicable to commercial and industrial customers who are subject to interruptions in capacity and supply. By choosing to be interruptible, the Company does not secure firm interstate pipeline capacity for these customers. As a result, customers served on this rate schedule do not pay transportation or demand charges.

¹³ See page 3 of 6 of Avista's Initial 2015 PGA Filing at: <http://edocs.puc.state.or.us/efdocs/UAA/ug289uaa85858.pdf>.

¹⁴ The "PGA Filing Guidelines" and "Natural Gas Portfolio Development" were acknowledged by the Commission in Order No. 09-248 and corrected in Order No. 09-263. Modifications to these guidelines were acknowledged by the Commission in Order No. 10-197, Order No. 11-196, and Order No. 14-238 in Docket No. UM 1286.

natural gas supplies and financial hedges.¹⁵ Staff's conclusions were supported by the Company's responses to multiple information requests.

True-Up of the 2014-2015 Gas Year (Tariff Sheet 462 or Rate Schedule 462)

Table 2: *True-Up of the 2014-2015 Gas Year*¹⁶
 (in \$/Therm or as noted otherwise)

Item		Current Rate	Proposed Rate	Change
Commodity Amortization	(D)	0.05099	-0.04927	-0.10026
Demand Amortization	(E)	-0.05226	0.02078	0.07304
Total Amortization	(F=D+E)	-0.00127 ¹⁷	-0.02849 ¹⁸	-0.02722

As for the commodity amortization, the new rebate rate of \$0.04927 per therm reflects a refund of approximately \$3.92 million, which comprises approximately \$5.16 million¹⁹ of over-collections in the period from November 2014 to June 2015 and approximately \$1.24 million²⁰ of under-collections from prior years. The \$5.16 million figure is after accounting for the commodity cost variance sharing between the Company and customers as required by Order No. 08-504 in Docket No. UM 1286.²¹ For the reasons

¹⁵ Accepted "best practices" for the purchase of natural gas supply by local distribution companies (LDCs) is portfolio construction that balances the objectives of reliability, cost, and price volatility using the tools of diversity, flexibility and balance. The "Natural Gas Portfolio Development Guidelines" (Portfolio Guidelines) implement these "best practices" for Oregon LDCs. The Portfolio Guidelines require gas utilities to include certain information related to their gas supply portfolio with their annual PGA filing. This information allows the Commission to determine the prudence of the utility's costs. Staff's analysis of and conclusions regarding Avista's natural gas supply portfolio and related purchasing strategies and actions are based on the Portfolio Guidelines.

¹⁶ Positive numbers represent surcharges; negative numbers or numbers in parentheses represent refunds.

¹⁷ See the Supplemental Fourth Revision Sheet 462 issued on September 12, 2014, "Rate" section, approved by the Public Utility Commission of Oregon in Order No. 14-373 of Docket No. UG 267 at: http://www.avistautilities.com/services/energypricing/or/curgas/Documents/OR_462.pdf.

¹⁸ See Fifth Revision Sheet 462 attached to Avista's Initial 2015 PGA Filing, "Rate" section, <http://edocs.puc.state.or.us/efdocs/UAA/ug289uaa85858.pdf>. Also see the Supplemental Fifth Revision Sheet 462 attached to Avista's Supplemental 2015 PGA Filing, <http://edocs.puc.state.or.us/efdocs/UAC/ug289uac83055.pdf>.

¹⁹ See page 6 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing (i.e., row "2" Column "i").

²⁰ See page 6 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing (i.e., row "1" Column "i").

²¹ For the 2014-2015 Gas Year, the Company elected a 90/10 variance sharing on July 25, 2014. See <http://edocs.puc.state.or.us/efdocs/HAD/um1286had17120.pdf>.

mentioned previously in this memo,²² actual wholesale natural gas prices were lower than the level approved in the Company's 2014 PGA.

As for the Demand Amortization portion, the Company is currently refunding \$0.052 per therm to customers (except Rate Schedule 440).²³ The Company proposes to increase the amount to be charged to customers to \$0.021 per therm. The new surcharge rate reflects the surcharge of \$1.575 million, which comprises approximately \$1.95 million²⁴ of an under-collection in the period from November 2014 to June 2015 and an under-collection of \$0.375 million²⁵ from previous years. The new surcharge rate is primarily the result of a reclassification of variable demand charges that had been inadvertently recorded in error in by Avista in the Commodity Deferral account. The demand deferral would have been relatively unchanged if not for this reclassification.

Pursuant to ORS 757.259 and OAR 860-027-0300, the annual average rate impact of the amortizations authorized under the statutes may not exceed three percent of the natural gas utility's gross revenues for the preceding calendar year unless the Commission finds that allowing a higher amortization rate is reasonable under the circumstances. As shown on Attachment C of this public meeting memo, the resulting annual average rate impact from the PGA amortization and two other filings²⁶ is -0.3 percent²⁷ and falls within the requirements of the statute.

²² See the "commodity" discussion part of this memo.

²³ Schedule 440 refers to Interruptible Service Customer. This rate schedule is applicable to commercial and industrial customers who are subject to interruptions in capacity and supply. By choosing to be interruptible, the Company does not secure firm interstate pipeline capacity for these customers. As a result, customers served on this rate schedule do not pay transportation or demand charges.

²⁴ See page 6 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing (i.e., row "7" Column "i").

²⁵ See page 6 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing (i.e., row "6" Column "i").

²⁶ Docket No. UG 291/Advice No. 15-06-G Amortization of DSM and Margin Recovery, and Docket No. UG 290/Advice No. 15-05-G Amortization of Intervenor Funding

²⁷ The exact figure shown in Attachment C of this public meeting memo is -0.3023 percent.

Table 3: Overall Revenue and Rate Impact
 (in \$ or as noted otherwise)

Schedule	Description	Total Revenues at Current Rates ^{28, 29}	Revenue Decrease ³⁰	Change (%) ³¹
410	Residential	64,704,680	-8,131,332	-12.57
420	General	29,883,409	-4,449,578	-14.89
424	Large General	3,367,059	-731,933	-21.74
440	Interruptible	2,223,720	-919,357	-41.34
444	Seasonal	212,084	-44,890	-21.17
456	Int. Transportation	3,211,359	-57,895	-1.80
	Overall	103,883,929 ³²	-14,334,984	-13.80

This 2015 PGA Filing reflects a revenue decrease of \$14.6 million,³³ or approximately 14.07³⁴ percent effective November 1, 2015, due to gas costs (Purchased Gas Cost Adjustment Provision; Schedule 461) and amortization of previous deferrals (Gas Cost Rate Adjustment; Schedule 462). Combining the impact of this filing with the two other regulatory filings filed on July 31, 2015 (i.e., Schedule 476, Intervenor Funding Schedule, Advice No. 15-05-G; and Schedule 478, DSM Cost Recovery, Advice No. 15-06-G), results in a revenue decrease of \$14.3 million,³⁵ or -13.80 percent,³⁶ as represented in Table 3 above.³⁷

²⁸ See column "Present Annual Revenue" of page 20 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing.

²⁹ "Total Revenues" include the revenues from: 1) base rates, 2) gas revenues (Purchased Gas Cost Adjustment Provision; Schedule 461), 3) amortizations (Gas Cost Rate Adjustment; Schedule 462), 4) intervenor funding (Intervenor Funding Grants – Oregon; Rate Schedule 476), and 5) low income assistance (Residential Low Income Rate Assistance Program – Oregon; Schedule 493).

³⁰ See column "Total Incremental Change in Revenue" of Attachment A of this public meeting memo.

³¹ See column "Total Change – Proposed Annual Change" of page 20 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing.

³² The total of \$103,883,929 does not equal the sum of the figures above this number, because it includes revenues of \$281,618 from Special Contracts. See page 20 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing (i.e., row "Special Contracts" Column "Present Annual Revenue").

³³ \$14.6 million is the difference *between* the revenues at proposed rates *and* the revenues at current rates only for gas revenues (Purchased Gas Cost Adjustment Provision; Schedule 461) and amortizations (Gas Cost Rate Adjustment; Schedule 462). See Attachment B of this public meeting memo.

³⁴ See page 20 of 29 in Avista's workpapers filed with its Supplemental 2014 PGA Filing (i.e., row "Total Annual Revenues." Column "PGA Only - Proposed Annual Change").

³⁵ See Attachment A of the Company's Supplemental 2015 PGA Filing, row "Total," column "Total Incremental Change in revenue".

³⁶ See page 20 of 29 in Avista's workpapers filed with its Supplemental 2015 PGA Filing (i.e., row "Total Annual Revenues." Column "Proposed Annual Change").

With these changes, effective November 1, 2015, the monthly bill of a residential customer using an average of 46 therms per month will decrease by \$7.86, or -12.6 percent, from \$62.47 to \$54.61.³⁸

PROPOSED COMMISSION MOTION:

Avista's application requesting gas cost changes for commodity and transportation, as proposed in Docket No. UG 289, be allowed to go into effect on November 1, 2015, along with the associated tariff sheets related to Advice No. 15-04-G.

Avista 2015 PGA

³⁷ The amounts shown in Table 3 include base rates, while the amounts shown in Attachments A and B to this memo are incremental changes without base rates.

³⁸ See Attachment D of this public meeting memo.

Avista Corporation

2015 PGA

Incremental Revenue Change by Customer Rate Schedule

Attachment A

Adjustment Schedule No. & Description		Gas Cost & Adjustment Schedule Revenue at Current ¹	Gas Cost & Adjustment Revenue at Proposed	Total Incremental Change in Revenue	% Contribution to Total Incremental Change
410	Residential	\$ 30,399,580	\$ 22,268,248	\$ (8,131,332)	56.72%
420	Small Commercial & Industrial	\$ 16,564,027	\$ 12,114,449	\$ (4,449,578)	31.04%
424	Large Commercial & Industrial	\$ 2,724,697	\$ 1,992,764	\$ (731,933)	5.11%
440	Interruptible for Large Commercial and Industrial	\$ 1,777,298	\$ 857,941	\$ (919,357)	6.41%
444	Seasonal	\$ 167,104	\$ 122,214	\$ (44,890)	0.31%
456	Transportation	\$ 49,782	\$ (8,113)	\$ (57,895)	0.40%
Total		\$ 51,682,488	\$ 37,347,503	\$ (14,334,984)	100.00%
Note:					

¹ Revenue at "Current" does not reflect current revenues, but rather what the revenues would be if existing rates continued to be in effect during the upcoming year (i.e. current rates times forecasted therms). There will be small differences with the Advice filings.

Avista Corporation

2015 PGA

Incremental Revenue Change by Adjustment Schedule

Attachment B

Customer Rate Schedule	Description	Gas Cost & Adjustment Schedule Total Revenue at Current ¹	Gas Cost & Adjustment Schedule Total Revenue at Proposed	Total Incremental Change in Revenue	Incremental Percentage Change by Rate	Percent Contribution to Total Incremental Change
461	Purchase Gas Adjustment	\$ 50,062,509	\$ 37,955,742	\$ (12,106,769)	-24.2%	84.46%
462	Purchase Gas Cost Amortization	\$ 96,150	\$ (2,414,289)	\$ (2,510,439)	-2611.0%	17.51%
476	Intervenor Funding	\$ 126,336	\$ 78,130	\$ (48,206)	-38.2%	0.34%
478	Demand Side Management	\$ 1,397,493	\$ 1,727,923	\$ 330,430	23.6%	-2.31%
				\$ -		
		\$ 51,682,488	\$ 37,347,506	\$ (14,334,984)		100.00%
Notes:						
¹ Revenue at "Current" does not reflect current revenues, but rather what the revenues would be if existing rates continued to be in effect during the upcoming year (i.e. current rates times forecasted therns). There will be small differences with the Advice filings.						

Avista Corporation

2015 PGA

Three Percent Test

Attachment C

	Surcharge	Credit	
<i>(includes revenue conversion)</i>			
Prior Period Gas Cost Deferral True-Up	\$ (2,414,646)	\$ -	-1.2008%
Non-Gas Cost Amortization			
Invervenor Funding	\$ 78,780	\$ -	0.0392%
Demand Side Management	\$ 1,728,006	\$ -	0.8593%
Total	\$ (607,860)	\$ -	-0.3023%
Total Proposed Amortization			
(Surcharge Less Credits)			\$ (607,860)
Less intervenor Funding ¹			\$ (78,780)
Net Proposed Amortization			
(subject to the 3% test)			\$ (686,641)
Utility Gross Revenue 2014²			\$ 201,089,425
3% of Utility Gross Revenue			\$ 6,032,683
Allowed Amortization			\$ (686,641)
Allowed Amortization as % of Gross Revenues			0.0000%
¹ Intervenor Funding is excluded from the result of the 3% test pursuant to ORS 757.259(4).			
² Unadjusted general revenues as shown in the most recent Results of Operations.			

