

ELLEN F. ROSENBLUM  
Attorney General



FREDERICK M. BOSS  
Deputy Attorney General

DEPARTMENT OF JUSTICE  
GENERAL COUNSEL DIVISION

July 20, 2017

Public Utility Commission of Oregon  
Attn: Filing Center  
201 High Street SE, Suite 100  
Salem, OR 97301-1166  
[PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

**Re: UG 325 – Motion to Admit Pre-Filed Staff Exhibits**

Commission Staff hereby submits for filing the Motion to Admit Pre-Filed Staff Exhibits and supporting declarations of Staff witnesses. In addition, Marianne Gardner's Declaration is also filed in support of Avista's Motion to Admit Joint Testimony in Support of Settlement Stipulation filed on June 29, 2017.

Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Riemenschneider".

Johanna M. Riemenschneider  
Sr. Assistant Attorney General  
Business Activities Section

JLM:pjr/#8380869  
Attachments

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 325**

In the Matter of  
AVISTA CORPORATION, dba AVISTA  
UTILITIES  
Request for a General Rate Revision

MOTION TO ADMIT PRE-FILED STAFF  
EXHIBITS

Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law Judge to admit the following pre-filed Staff Exhibits into the record in the above-captioned docket:

<b>Exhibit No.</b>	<b>Exhibit</b>
Staff Exhibit 100	Opening Testimony of Marianne Gardner
Staff Exhibit 101	Witness Qualification Statement of Marianne Gardner
Staff Exhibit 102	Uncollectibles – Associated Avista workpaper and responses to Staff Data Requests
Staff Exhibit 103	Wages, Salaries and Incentives – Associated Staff workpaper and Avista responses to Staff Data Requests
Staff Exhibit 104	Property Taxes – Associated Avista Responses to Staff Data Requests
Staff Exhibit 105	SIT, FIT and ADIT – Associated Avista workpaper and responses to Staff Data Requests
Staff Exhibit 106	Escalation – Excerpt from Consumer Price Index – All Urban Consumers for the U.S., published by OEA (released November 16, 2016)
Staff Exhibit 200	Opening Testimony of Matthew Muldoon
Staff Exhibit 201	Witness Qualification Statement of Matthew Muldoon
Staff Exhibit 202	Staff Peer Screening
Staff Exhibit 203	Staff Three Stage DCF Modeling

1	Staff Exhibit 204	Staff's Treasury Inflation Protected Securities (TIPS) Analysis
2	Staff Exhibit 205	Staff GDP Analysis with U.S. Bureau of Economic Analysis (BEA) Data
3	Staff Exhibit 206	Staff CAPM Modeling
4	Staff Exhibit 207	Cost of Long-term Debt Table and Maturity Profile - Confidential
5	Staff Exhibit 208	Merger and Acquisition Trends
6	Staff Exhibit 209	Value Line (VL) Gas and Water Utility Profiles
7	Staff Exhibit 210	Security Market Trends – News that Investors are Seeing
8	Staff Exhibit 211	Pension and Post-Retirement Medical Expenses -- Confidential
9	Staff Exhibit 300	Opening Testimony of Lisa Gorsuch
10	Staff Exhibit 301	Witness Qualification Statement of Lisa Gorsuch
11	Staff Exhibit 302	Avista responses to Staff Data Request Nos. 255, 256, portion of 257
12	Staff Exhibit 303	Staff Illustration of Avista Gas Storage in Rate Base, Gas Storage Operating Expense and Other Gas Supply Expense
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14	Staff Exhibit 400	Opening Testimony of Judy Johnson
15	Staff Exhibit 401	Witness Qualification Statement of Judy Johnson
16	Staff Exhibit 402	Cost of D&O Liability Insurance - Confidential
17	Staff Exhibit 403	Avista response to Staff Data Request No. 68
18	Staff Exhibit 500	Opening Testimony of Ming Peng
19	Staff Exhibit 501	Witness Qualification Statement of Ming Peng
20	Staff Exhibit 502	Avista response to Staff Data Request No. 122
21	Staff Exhibit 600	Opening Testimony of Max St. Brown
22	Staff Exhibit 601	Witness Qualification Statement of Max St. Brown
23	Staff Exhibit 602	Staff's LRIC Study Adjustments
24	Staff Exhibit 603	Description of Akaike Information Criterion
25	Staff Exhibit 604	Page 658 from textbook, Principles of Forecasting

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1	Staff Exhibit 605	Plots of Staff's load forecast outputs
2	Staff Exhibit 606	Staff's Load Forecasting Model formulas
3	Staff Exhibit 607	Workpaper for Staff's sales and transportation revenue adjustment corresponding to Staff's load forecasting adjustment
4	Staff Exhibit 608	Avista responses to Staff Data Request Nos. 165 and 336
5	Staff Exhibit 609	Staff's Computation of data in Avista responses to Staff Data Request Nos. 144 and 388
6	Staff Exhibit 700	Opening Testimony of Lance Kaufman
7	Staff Exhibit 701	Witness Qualification Statement of Lance Kaufman
8	Staff Exhibit 702	Avista responses to Staff Data Requests
9	Staff Exhibit 703	Avista responses to Staff Data Requests -- Confidential
10	Staff Exhibit 704	Staff's Affiliated Interest Adjustments
11	Staff Exhibit 705	Staff's Cost Allocation Adjustments
12	Staff Exhibit 706	Staff's IT and General Plant Adjustments
13	Staff Exhibit 707	Avista Capital Projects Business Cases
14	Staff Exhibit 708	Staff's Additional Plant Support
15	Staff Exhibit 800	Opening Testimony of Mitchell Moore
16	Staff Exhibit 801	Witness Qualification Statement of Mitchell Moore
17	Staff Exhibit 802	Staff Analysis of Bonanza Growth Project and Avista's methodology for calculating Internal Rate of Return
18	Staff Exhibit 803	Avista responses to Staff Data Request Nos. 245(B), 335(A), 346, 367, 432
19	Staff Exhibit 804	Avista investor presentation at BMO Capital Markets Road Show
20	Staff Exhibit 805	Avista's partial response to Staff Data Request No. 181, Attachment D
21	Staff Exhibit 806	Avista responses to Staff Data Request Nos. 185C, Attachment A, 417C, Attachment D -- Confidential
22	Staff Exhibit 807	Avista partial Response to Staff Data Request No. 182, Attachment AI
23	Staff Exhibit 900	Opening Testimony of Rose Anderson
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1	Staff Exhibit 901	Witness Qualification Statement of Rose Anderson
2	Staff Exhibit 902	Avista response to Staff Data Request No. 104
3	Staff Exhibit 903	Avista partial response to Staff Data Request No. 214
4	Staff Exhibit 904	Avista response to Staff Data Request No. 263
5	Staff Exhibit 905	Avista response to Staff Data Request No. 379
6	Staff Exhibit 906	Avista response to Staff Data Request No. 262
7	Staff Exhibit 907	Revenue requirement model filed in Avista's workpaper
8	Staff Exhibit 908	Avista response to Staff Data Request No. 144
9	Staff Exhibit 909	Avista's Rule No. 20
10	Staff Exhibit 910	Avista Response to Staff Data Request No. 393
11	Staff Exhibit 1000	Opening Testimony of Abdoulaye Barry
12	Staff Exhibit 1001	Witness Qualification Statement of Abdoulaye Barry
13	Staff Exhibit 1002	Avista responses to Staff Data Request Nos. 350, 369, 371. 389, and 390
14	Staff Exhibit 1100	Opening Testimony of Scott Gibbens
15	Staff Exhibit 1101	Witness Qualification Statement of Scott Gibbens
16	Staff Exhibit 1102	Staff references and workpaper
17	Staff Exhibit 1103	Avista partial response to Staff Data Request No. 363 -- Confidential
18	Staff Exhibit 1104	Avista response to Staff Data Request No. 384
19	Staff Exhibit 1105	Staff workpaper - Confidential
20	Staff Exhibit 1200	Opening Testimony of Geoffrey Ihle
21	Staff Exhibit 1201	Witness Qualification Statement of Geoffrey Ihle
22	Staff Exhibit 1202	Avista response to Staff Data Request No. 172 -- Confidential
23	Staff Exhibit 1203	Avista response to Staff Data Request No. 173 -- Confidential
24	Staff Exhibit 1204	Avista response to Staff Data Request No. 341
25	Staff Exhibit 1300	Opening Testimony of Phil Boyle
26	Staff Exhibit 1301	Witness Qualification Statement of Phil Boyle





BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of )  
AVISTA CORPORATION, dba AVISTA )  
UTILITIES )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
ROSE ANDERSON

I, Rose Anderson, state the following, under penalty of perjury in the State of Oregon:

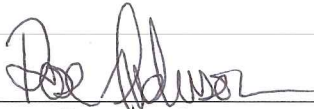
1. I am a Utility Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 900 and Staff Exhibit 901 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 10<sup>th</sup> day of July 2017.

  
\_\_\_\_\_  
Rose Anderson

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of )  
AVISTA CORPORATION, dba AVISTA )  
UTILITIES )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
PHIL BOYLE

I, Phil Boyle, state the following, under penalty of perjury in the State of Oregon:

1. I am the Program Manager of the Consumer Services Section for the Public Utility Commission of Oregon Staff ("Staff").

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1300 and Staff Exhibit 1301 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 10<sup>th</sup> day of July 2017.

  
\_\_\_\_\_  
Phil Boyle



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of	)	
	)	
AVISTA CORPORATION, dba AVISTA	)	
UTILITIES	)	DECLARATION OF
	)	MARIANNE GARDNER
Request for a General Rate Revision	)	
_____	)	

I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Revenue Requirement Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy – Rates, Finance and Audit Division.

2. On behalf of Staff, I sponsored the pre-filed joint testimony submitted for use in this docket in support of the Stipulation entitled Joint Testimony/Gardner, et.al. (Exhibit Joint Testimony/100) and attached Exhibit 101 (containing a copy of the Settlement Stipulation).

3. I drafted testimony on behalf of Staff that was pre-filed for use in this docket as Staff Exhibit 100, along with Staff Exhibit 101 (witness qualification statement).

4. I have reviewed and adopt the testimony drafted by Staff witness Abdoulaye Barry, pre-filed for use in this docket as Staff Exhibit 1000.

5. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 11 day of July 2017.

  
 \_\_\_\_\_  
 Marianne Gardner

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of )  
AVISTA CORPORATION, dba AVISTA )  
UTILITIES )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
SCOTT GIBBENS

I, Scott Gibbens, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1100 and Staff Exhibit 1101 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 7<sup>th</sup> day of July 2017.

  
\_\_\_\_\_  
Scott Gibbens

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of )  
 )  
AVISTA CORPORATION, dba AVISTA )  
UTILITIES )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
LISA GORSUCH

I, Lisa Gorsuch, state the following, under penalty of perjury in the State of Oregon:


1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff (“Staff”). I work in the Energy Resources and Planning Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 300 and Staff Exhibit 301 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 6 day of July 2017.

  
\_\_\_\_\_  
Lisa Gorsuch



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON



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UG 325

In the Matter of )  
AVISTA CORPORATION, dba AVISTA )  
UTILITIES )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
GEOFFREY IHLE

I, Geoffrey Ihle, state the following, under penalty of perjury in the State of Oregon:

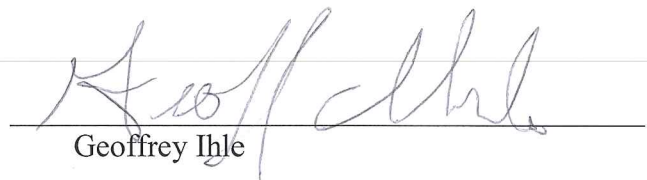
1. I am a Senior Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Resources and Planning Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1200 and Staff Exhibit 1201 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 07 day of July 2017.

  
\_\_\_\_\_  
Geoffrey Ihle

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of	)	
	)	
AVISTA CORPORATION, dba AVISTA	)	
UTILITIES	)	DECLARATION OF
	)	LANCE KAUFMAN
Request for a General Rate Revision	)	
_____	)	

I, Lance Kaufman, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 700 and Staff Exhibit 701 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 19 day of July 2017.




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Lance Kaufman

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of )  
AVISTA CORPORATION, dba AVISTA )  
UTILITIES )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
MITCHELL MOORE

I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:

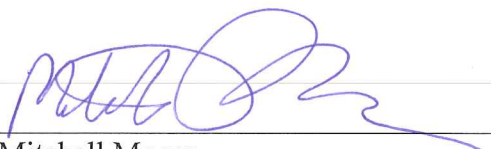
1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 800 and Staff Exhibit 801 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 7 day of July 2017.

  
\_\_\_\_\_  
Mitchell Moore



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of )  
AVISTA CORPORATION, dba AVISTA )  
UTILITIES )  
Request for a General Rate Revision )  
\_\_\_\_\_ )

DECLARATION OF  
MATTHEW J. MULDOON

I, Matthew (Matt) J. Muldoon, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy – Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed testimony submitted for use in this docket as Staff Exhibit 200 and Staff Exhibit 201 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 6 day of July 2017.

  
Matthew (Matt) J. Muldoon

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of	)	
	)	
AVISTA CORPORATION, dba AVISTA	)	
UTILITIES	)	DECLARATION OF
	)	MING PENG
Request for a General Rate Revision	)	
_____	)	

I, Ming Peng, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 500 and Staff Exhibit 501 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 6th day of July 2017.

  
 \_\_\_\_\_  
 Ming Peng

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of	)	
	)	
AVISTA CORPORATION, dba AVISTA	)	
UTILITIES	)	DECLARATION OF
	)	MAX ST. BROWN
Request for a General Rate Revision	)	
_____	)	

I, Max St. Brown, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Utility Economist for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 600 and Staff Exhibit 601 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony and witness qualification statement are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 6 day of July 2017.



Max St. Brown



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 325

In the Matter of	)	
	)	
AVISTA CORPORATION, dba AVISTA	)	
UTILITIES	)	DECLARATION OF
	)	KATHY ZARATE
Request for a General Rate Revision	)	
_____	)	

I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:

1. I am a Utility Analyst for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.

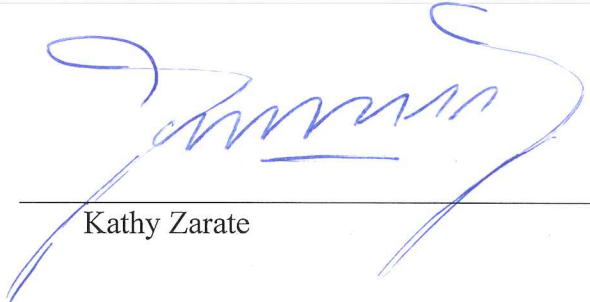
2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1400 and Staff Exhibit 1401 (witness qualification statement).

3. I have reviewed and also adopt testimony drafted by Staff witness Judy Johnson, pre-filed as Staff Exhibit 400.

4. To the best of my knowledge, my pre-filed testimony, witness qualification statement and the pre-filed testimony of Judy Johnson are true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this \_\_\_\_ day of July 2017.




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Kathy Zarate