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

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,

Un

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

JLM:pjr/#8380869 Attachments

1		BEFORE THE PUBLIC	UTILITY COMMISSION
2	OF OREGON		
2	UG 325		
		1. 1.	
4	In the Matter of	n B	MOTION TO ADMIT PRE-FILED STAFF EXHIBITS
5	AVISTA CORPORA UTILITIES	TION, dba AVISTA	
6	Request for a General Rate Revision		
7		5	, ,
8	Staff of the Pu	ublic Utility Commission of	of Oregon (Staff) asks the Administrative Law
9	Judge to admit the fo	llowing pre-filed Staff Exh	nibits into the record in the above-captioned
10	docket:		
11	-		
12	Exhibit No.	Exhibit	
13	Staff Exhibit 100	Opening Testimony of M	Iarianne Gardner
14	Staff Exhibit 101	Witness Qualification St	atement of Marianne Gardner
15	Staff Exhibit 102	Uncollectibles – Associa Requests	ted Avista workpaper and responses to Staff Data
16	Staff Exhibit 103		entives – Associated Staff workpaper and Avista
17		responses to Staff Data F	Cequesis
18	Staff Exhibit 104	Property Taxes – Associ	ated Avista Responses to Staff Data Requests
19	Staff Exhibit 105	SIT, FIT and ADIT – As Data Requests	sociated Avista workpaper and responses to Staff
20 21	Staff Exhibit 106		m Consumer Price Index – All Urban Consumers y OEA (released November 16, 2016)
22	Staff Exhibit 200	Opening Testimony of M	fatthew Muldoon
23	Staff Exhibit 201	Witness Qualification St	atement of Matthew Muldoon
24	Staff Exhibit 202	Staff Peer Screening	
25	Staff Exhibit 203	Staff Three Stage DCF N	Aodeling

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Page 1 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 325) JMR//pjr/8375432

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 13	Staff Exhibit 303	Staff Illustration of Avista Gas Storage in Rate Base, Gas Storage Operating Expense and Other Gas Supply Expense
13	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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Page 2 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 325) JMR//pjr/8375432

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 6	Staff Exhibit 609	Staff's Computation of data in Avista responses to Staff Data Request Nos. 144 and 388
7	Staff Exhibit 700	Opening Testimony of Lance Kaufman
8	Staff Exhibit 701	Witness Qualification Statement of Lance Kaufman
9	Staff Exhibit 702	Avista responses to Staff Data Requests
10	Staff Exhibit 703	Avista responses to Staff Data Requests Confidential
11	Staff Exhibit 704	Staff's Affiliated Interest Adjustments
12	Staff Exhibit 705	Staff's Cost Allocation Adjustments
13	Staff Exhibit 706	Staff's IT and General Plant Adjustments
14	Staff Exhibit 707	Avista Capital Projects Business Cases
15	Staff Exhibit 708	Staff's Additional Plant Support
16	Staff Exhibit 800	Opening Testimony of Mitchell Moore
17	Staff Exhibit 801	Witness Qualification Statement of Mitchell Moore
18	Staff Exhibit 802	Staff Analysis of Bonanza Growth Project and Avista's methodology for calculating Internal Rate of Return
19 20	Staff Exhibit 803	Avista responses to Staff Data Request Nos. 245(B), 335(A), 346, 367, 432
21	Staff Exhibit 804	Avista investor presentation at BMO Capital Markets Road Show
22	Staff Exhibit 805	Avista's partial response to Staff Data Request No. 181, Attachment D
23	Staff Exhibit 806	Avista responses to Staff Data Request Nos. 185C, Attachment A, 417C, Attachment D Confidential
24	Staff Exhibit 807	Avista partial Response to Staff Data Request No. 182, Attachment AI
25	Staff Exhibit 900	Opening Testimony of Rose Anderson
26		

Page 3 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 325) JMR//pjr/8375432

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

Page 4 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 325) JMR//pjr/8375432

1	Staff Exhibit 1302	Avista responses to Staff	Data Request Nos. 220 and 224 – Confidential
2	Staff Exhibit 1303	Staff's graph on adoption	rates
3	Staff Exhibit 1304	Staff's comparison graph	on adoption rates of other utilities
4	Staff Exhibit 1305	Staff's graph with calcula	tion of payment transactions Confidential
5	Staff Exhibit 1306	Avista response to Staff I	Data Request No. 226
6	Staff Exhibit 1307	Avista response to Staff I	Data Request No. 329
7	Staff Exhibit 1308	Avista response to Staff I	Data Request No. 375
8	Staff Exhibit 1400	Opening Testimony of Ka	athy Zarate
9	Staff Exhibit 1401	Witness Qualification Sta	tement of Kathy Zarate
10	Staff Exhibit 1402	Avista responses to Staff	Data Request Nos. 167, 204, 205, 206, and 207
11	Staff Exhibit 1403	Avista response to Staff I	Data Request No. 340
12	This Motion t	o Admit Pre-Filed Staff Fx	hibits is supported by Declarations of Staff
13			Gardner, Scott Gibbens, Lisa Gorsuch, Geoffrey
14		· ·	Muldoon, Ming Peng, Max St. Brown, and
15			eir testimony. The Declarations are attached to
16	this motion.		
17		20^{10} day of July 2017.	
18		<u></u> any ereany _ere	Respectfully submitted,
19			ELLEN F. ROSENBLUM Attorney General
20			
21			John Kust
22			Johanna M. Riemenschneider, #990083 Senior Assistant Attorney General
23			Of Attorneys for Staff of the Public Utility Commission of Oregon
24			Commission of Oregon
25			
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Page	5 - MOTION TO A JMR//pjr/8375432	DMIT PRE-FILED STAFE	F TESTIMONY (UG 325)
	and a second sec		

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3 4	In the Matter of)
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6 7) ROSE ANDERSON ())
8	
9	I, Rose Anderson, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Utility Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 900 and Staff Exhibit 901 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16 17 18 19	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.
20	SIGNED this 10^{+-} day of July 2017.
21	for Aburer
22	Rose Anderson
23	
24	
25	
26	
Page	1 - UG 325 - DECLARATION OF ROSE ANDERSON JLM/pjr/8368049
	Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4520 / Fax: (503) 378-3784

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3 4	In the Matter of
5	AVISTA CORPORATION, dba AVISTA UTILITIES) DECLARATION OF) PHIL BOYLE
6 7	Request for a General Rate Revision)
8	
9	I, Phil Boyle, state the following, under penalty of perjury in the State of Oregon:
10	1. I am the Program Manager of the Consumer Services Section for the Public
11	Utility Commission of Oregon Staff ("Staff").
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 1300 and Staff Exhibit 1301 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16 17 18	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.
19	
20	SIGNED this 10 th day of July 2017.
21	Phil Boyle
22	
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Page	1 - UG 325 - DECLARATION OF PHIL BOYLE JLM/pjr/8368170

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	
4	In the Matter of))
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6) MARIANNE GARDNER Request for a General Rate Revision)
7	
8	
9	I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Revenue Requirement Analyst for the Public Utility Commission of
11	Oregon Staff ("Staff"). I work in the Energy – Rates, Finance and Audit Division.
12	2. On behalf of Staff, I sponsored the pre-filed joint testimony submitted for use in
13	this docket in support of the Stipulation entitled Joint Testimony/Gardner, et.al. (Exhibit Joint
14	Testimony/100) and attached Exhibit 101 (containing a copy of the Settlement Stipulation).
15	3. I drafted testimony on behalf of Staff that was pre-filed for use in this docket as
16	Staff Exhibit 100, along with Staff Exhibit 101 (witness qualification statement).
17	4. I have reviewed and adopt the testimony drafted by Staff witness Abdoulaye
18	Barry, pre-filed for use in this docket as Staff Exhibit 1000.
19	5. To the best of my knowledge, my pre-filed testimony and witness qualification
20	statement are true and accurate.
21	
22	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
23	penalty for perjury.
24	SIGNED this $//$ day of July 2017.
25	Marianne Gardner Marianne Gardner
26	Marianne Gardner
Page	1 - UG 325 DECLARATION OF MARIANNE GARDNER JLM/pjr//8362787

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	In the Matter of)
4))
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6) SCOTT GIBBENS Request for a General Rate Revision)
7)
8	
9	I, Scott Gibbens, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 1100 and Staff Exhibit 1101 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17 18	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.
19	7th 2
20	SIGNED this $\underline{+}$ day of July 2017.
21	South Cilkana
22	Scott Gibbens
23	
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Page	1 - UG 325 - DECLARATION OF SCOTT GIBBENS JLM/pjr/8368127

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	In the Matter of)
4)
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6	Request for a General Rate Revision) LISA GORSUCH
7 8	
9	I, Lisa Gorsuch, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Resources and Planning Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 300 and Staff Exhibit 301 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17 18	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.
19	Forme? For?.
20	SIGNED this 6 day of July 2017.
21	gisa Lorsuch
22	Lisa Gorsuch
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Page	1 - UG 325 - DECLARATION OF LISA GORSUCH JLM/pjr//863732

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	
4	In the Matter of)
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6	Request for a General Rate Revision) GEOFFREY IHLE
7)
8	
9	I, Geoffrey Ihle, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Resources and Planning Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 1200 and Staff Exhibit 1201 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17 18	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.
19	penaity for perjury.
20	SIGNED this <u>07</u> day of July 2017.
21	K18/CM
22	Geoffrey Ihle
23	
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25	
26	
Page	1 - UG 325 - DECLARATION OF GEOFFREY IHLE JLM/pjr/8368147

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3 4	In the Matter of)
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6 7	Request for a General Rate Revision) LANCE KAUFMAN
8	
9	I, Lance Kaufman, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 700 and Staff Exhibit 701 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17 18	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.
19	Permit for Perjony.
20	SIGNED this day of July 2017.
21	Lance Kaufman
22	
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Page	1 - UG 325 - DECLARATION OF LANCE KAUFMAN JLM/pjr/8367732

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3 4	In the Matter of)
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6 7	Request for a General Rate Revision) MITCHELL MOORE))
8	
9	I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 800 and Staff Exhibit 801 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17 18	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.
19	penaity for perjury.
20	SIGNED this $\frac{7}{100}$ day of July 2017.
21	Mitchell Moore
22	witchen widdle
23	
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Page	1 - UG 325 - DECLARATION OF MITCHELL MOORE JLM/pjr/8367993

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	
4	In the Matter of)
5	AVISTA CORPORATION, dba AVISTA)UTILITIES)DECLARATION OF
6) MATTHEW J. MULDOON Request for a General Rate Revision)
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9	I, Matthew (Matt) J. Muldoon, state the following, under penalty of perjury in the State of
10	Oregon:
11	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
12	("Staff"). I work in the Energy – Rates, Finance and Audit Division.
13	2. On behalf of Staff, I drafted the pre-filed testimony submitted for use in this
14	docket as Staff Exhibit 200 and Staff Exhibit 201 (witness qualification statement).
15	3. To the best of my knowledge, my pre-filed testimony and witness qualification
16	statement are true and accurate.
17	
18	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
19	penalty for perjury.
20	
21	SIGNED this 6 day of July 2017.
22	Matthew Matt) J. Muldoon
23	Wiattliew (Wiatt) Wuiddon
24	
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26	
Page	1 - UG 325 - DECLARATION OF MATTHEW MULDOON JLM/pjr//863589
	Department of Justice

1162 Court Street NE Salem, OR 97301-4096 (503) 947-4520 / Fax: (503) 378-3784

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	In the Matter of)
4 5 6	AVISTA CORPORATION, dba AVISTA UTILITIES) DECLARATION OF) MING PENG
7	Request for a General Rate Revision)
8	
9	I, Ming Peng, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 500 and Staff Exhibit 501 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16 17 18	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.
19 20	SIGNED this 6 day of July 2017.
20	mit Pert
21	Ming Peng
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Page	1 - UG 325 - DECLARATION OF MING PENG JLM/pjr//8367337

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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	In the Matter of
4)
5	AVISTA CORPORATION, dba AVISTA)UTILITIES)DECLARATION OF
6) MAX ST. BROWN Request for a General Rate Revision)
7	
8	
9	I, Max St. Brown, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Utility Economist for the Public Utility Commission of Oregon
11	Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 600 and Staff Exhibit 601 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	I haraby dealars that the above statement is true to the best of my knowledge and
17	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
18	penalty for perjury.
19	SIGNED this 6 day of July 2017.
20	Mox It Burn
21	Max St. Brown
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Page	JLM/pjr//8367642
	Department of Justice

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 325
3	
4	In the Matter of)
5	AVISTA CORPORATION, dba AVISTA) UTILITIES) DECLARATION OF
6 7	Request for a General Rate Revision) KATHY ZARATE))
8	
9	I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Utility Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 1400 and Staff Exhibit 1401 (witness qualification statement).
14	3. I have reviewed and also adopt testimony drafted by Staff witness Judy Johnson,
15	pre-filed as Staff Exhibit 400.
16	4. To the best of my knowledge, my pre-filed testimony, witness qualification
17	statement and the pre-filed testimony of Judy Johnson are true and accurate.
18	
19	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
20	penalty for perjury.
21	
22	SIGNED this day of July 2017.
23	Vothy Zoroto
24	Kathy Zarate
25	
26	
Page	1 - UG 325 - DECLARATION OF KATHY ZARATE JLM/pjr//8363757
	Department of Justice 1162 Court Street NE Salem, OR 97301-4096 (503) 947-4520 / Fax: (503) 378-3784