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October 31, 2023

Public Utilities Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
Salem, OR 97301-3612

RE: Docket No. UM 1753—Avista Utilities Application for Reauthorization

Filing Center:

In accordance with ORS 757.259 and OAR 860-027-0300, Avista Corporation, dba Avista Utilities (Avista or Company), hereby submits for electronic filing an Application for Reauthorization to defer certain expenses or revenues related to its Natural Gas Decoupling Mechanism.

As required by OAR 860-027-0300(3)(e) and (6), a Notice of Application and list of persons served with the Notice has been sent to all parties in the Company's latest general rate case, Docket No. UG 461. A copy of the Notice is attached as an Exhibit to the Application.

If you have any questions regarding this filing, please contact Joel Anderson at (509) 495-2811 or email joel.anderson@avistacorp.com.

Sincerely,

/s/Joe Miller

Joe Miller
Sr. Manager of Rates & Tariffs
Avista Utilities
509-495-4546
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BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

DOCKET NO. UM 1753

IN THE MATTER OF THE APPLICATION OF AVISTA UTILITIES FOR AN ORDER REAUTHORIZING DEFERRAL OF EXPENSES OR REVENUES RELATED TO THE NATURAL GAS DECOUPLING MECHANISM	)))))	APPLICATION FOR REAUTHORIZATION OF CERTAIN DEFERRAL ACCOUNTS

Avista Corporation, dba Avista Utilities (Avista or Company), pursuant to ORS 757.259 and OAR 860-027-0300(4), applies to the Public Utility Commission of Oregon (Commission) for an order reauthorizing it to utilize deferred accounting for its Natural Gas Decoupling Mechanism. The Company respectfully requests that the reauthorization become effective January 1, 2024.

In support of this Application, the Company states:

Avista provides natural gas service in southwestern and northeastern Oregon and is a public utility subject to the Commission's jurisdiction under ORS 757.005(1)(a)(A).

Avista requests that all notices, pleadings, and correspondence regarding this Application be sent to the following:

Patrick Ehrbar
Director of Regulatory Affairs
Avista Corporation
P.O. Box 3727
1411 E. Mission, MSC-27
Spokane, WA 99220-3727
(509) 495-8620
Pat.ehrbar@avistacorp.com

David J. Meyer
Vice President and Chief Counsel
for Regulatory and Governmental Affairs
Avista Corporation
P.O. Box 3727
1411 E. Mission, MSC-27
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(509) 495-4316
David.meyer@avistacorp.com

This Application is filed pursuant to ORS 757.259, which empowers the Commission to authorize the deferral of expenses or revenues of a public utility for later incorporation into rates.

BACKGROUND

Deferral of the revenue or expenses related to the Company's Natural Gas Decoupling Mechanism was most recently authorized on April 5, 2023 by Order No. 23-127 in Docket No. UM 1753. The authorization for deferred accounting treatment as described above can be authorized pursuant to ORS 757.259(2)(e). Under the Company's Natural Gas Decoupling Mechanism, decoupled revenue above or below the base level established in the General Rate Case (GRC) associated with concurrent effective rates[1] will be tracked over a 12-month period, and later rebated or surcharged to customers. This meets the requirement under ORS 757.259(2)(e), specifically "Identifiable utility expenses or revenues, the recovery or refund of which the commission finds should be deferred in order to minimize the frequency of rate changes or the fluctuation of rate levels or to match appropriately the costs borne by and benefits received by ratepayers."

Section 6 of the Partial Settlement Stipulation in Docket No. UG-288, approved by the Commission in Order No. 16-109, sets forth the agreed-upon Natural Gas Decoupling Mechanism. The Commission approved a Revenue-Per-Customer decoupling mechanism for Avista's natural gas operations. The mechanism compares actual decoupled revenues, by rate group, to allowed decoupled revenues determined on a per-customer basis, with any differences deferred for later rebate or surcharge. Below are the key components of the mechanism:

a. Decoupling Mechanism Term. The mechanism became effective on March 1, 2016, and was modified, in part, in Avista's 2019 GRC, Docket No. UG 366 (see "Interest on Deferrals" below).

b. Rate Groups. Customers are combined into two "Rate Groups":

[1] Originally established in Docket No. UG-288 (effective March 1, 2016), subsequently re-set in Docket No. UG-325 (effective October 1, 2017 and November 1, 2017), Docket No. UG-366 (effective January 15, 2020), Docket No. UG-389 (effective January 16, 2021) and Docket No. UG-433 (effective August 22, 2022)

1. Residential – Schedule 410
2. Commercial – Schedules 420, 424, 440, and 444

c. Existing Customers and New Customers. New customers, defined as new meters hooked up to Avista's distribution system, are not included in the mechanism unless those new meters were included in the test year forecast of revenues.[2] In addition, Avista tracks new customer usage for informational purposes, for a three-year period, to determine whether new customers use more or less than existing customers.

d. Quarterly Reporting. Avista files, within 45 days of the end of each quarter, a report detailing the decoupling activity by month. The reporting includes information related to the deferrals by rate group, use-per-customer for existing and new customers, and other summary financial information. Avista also provides such other information as may be reasonably requested, from time to time, in the quarterly reports.

e. Annual Filings. On or before August 1 of each year, the Company will file a proposed rate adjustment (surcharge or rebate) based on the amount of deferred revenue recorded for the prior January through December time period.[3] The rate adjustment is calculated separately for each Rate Group, with the applicable surcharge or rebate recovered from each group on a uniform-cents-per-therm basis. The proposed tariff Schedule 475 included with those filings will include a rate adjustment that recovers/rebates the appropriate deferred revenue amount over a twelve-month period, effective on November 1st, to match with the annual Purchased Gas Cost

[2] The number of customers decoupled each month cannot exceed the monthly forecasted number of customers, by rate group, included in the agreed-upon 2022 forecasted customers (Docket UG-433). To the extent the number of actual customers in a given month exceed the forecasted level of customers, the Company will use the new customer revenue hookup report to determine the average decoupled revenue per new customer. The average decoupled revenue per customer would then be multiplied by the number of actual customers that exceed the monthly forecasted level of customers. That amount would then be deducted from the monthly actual decoupled revenue prior to calculating the decoupling deferral entry.

[3] For 2016, only 10 months (March 1, 2016 through December 31, 2016) were tracked, and the associated tariff revision was approved via the Commission's the Consent Agenda on October 12, 2017 (Docket UG-342/Advice No. 17-05-G).

Adjustment rate adjustment time period. The deferred revenue amount approved for recovery or rebate will be transferred to a balancing account and the revenue surcharged or rebated during the period will reduce the deferred revenue in the balancing account. After determining the amount of deferred revenue that can be recovered through a surcharge, or refunded through a rebate, by Rate Group, the proposed rates under Schedule 475 will be determined by dividing the deferred revenue to be recovered by Rate Group by the estimated therm sales for each Rate Group during the twelve-month recovery period. Any deferred revenue remaining in the balancing account at the end of the amortization period will be added to the new revenue deferrals to determine the amount of the proposed surcharge/rebate for the following year.

f. Interest on Deferrals – Interest will accrue on deferrals at the effective Modified Blended Treasury Rate.[4]

g. Interest on Amortization of Deferrals – Once a deferral balance is approved for amortization, interest will accrue at the Modified Blended Treasury Rate, similar to other Company amortizations.

DESCRIPTION OF DEFERRAL

Presently the Company uses two deferral accounts, one for the Residential Rate Group and the other for the Commercial Rate Group, to explicitly account for decoupling deferrals as required in Order No. 16-109. The Company records the deferrals in account 186 – Miscellaneous Deferred Debits. The amount approved for recovery or rebate would then be transferred into a Regulatory Asset account (FERC Account 182 – Other Regulatory Asset) or Regulatory Liability account

[4] In recognition of part a. above, all parties had the opportunity to review the decoupling mechanism during the course of the Company's General Rate Case Docket No. UG-366 which was filed March 15, 2019. Oregon Citizen's Utility Board (CUB) provided testimony proposing to change the Company's decoupling mechanism from a deferred account that accrues interest at the Company's Authorized Rate of Return, to a mechanism supported by an underlying deferral that accrues interest at the Modified Blended Treasury Rate (MBTR). Through settlement, the parties agreed to modify the mechanism to accrue interest on the deferrals at the effective MBTR. This modification became effective January 15, 2020 with the rates approved by Order No. 19-331.

(FERC Account 254 – Other Regulatory Liability) for amortization. On the income statement, the Company will record both the deferred revenue and the amortization of the deferred revenue through Account 495 (Other Gas Revenue), in separate sub-accounts.

The amount subject to deferral for the Natural Gas Decoupling Mechanism will be dependent upon the difference between the actual, after-the-fact, therm sales, compared with the therm sales used in the rate case to establish base rates. This difference in therm sales can be caused by conservation, weather, and changes in the economy.

The amount of the rate increase resulting from the decoupling adjustment will be subject to an annual incremental limit of 3%, i.e., the annual increase in the surcharge cannot exceed 3% of billed revenues for each rate group, each year, with unrecovered balances carried forward to future years for recovery. The incremental surcharge (percentage) increase is determined by subtracting the annual revenue amount recovered by the present surcharge rate from deferred revenue to be recovered through the proposed surcharge rate and dividing that net amount by the total "normalized" revenue by Rate Group for the most recent January through December period. The normalized revenue is determined by multiplying the weather-corrected usage for the period by the present billing rates in effect. If the incremental surcharge exceeds a 3% rate increase, only a 3% increase is implemented and any additional deferred revenue will remain in the deferred revenue account, and could be recovered the following year, subject to the 3% limitation. The 3% limitation is not applicable if the Company is in a rebate position.

PROPOSED ACCOUNTING

In this Reauthorization application, the Company proposes to continue to use two deferral accounts to explicitly account for the Residential group and Commercial group decoupling deferrals. Avista would continue to record the deferrals in account 186 – Miscellaneous Deferred Debits. The amount approved for recovery or rebate would then be transferred into a Regulatory Asset account (FERC Account 182 – Other Regulatory Asset) or Regulatory Liability account (FERC Account 254 – Other Regulatory Liability) for amortization. On the income statement, the Company will record both the deferred revenue and the amortization of the deferred revenue through Account 495 (Other Gas Revenue), in separate sub-accounts.

Interest on the deferred balances will be accrued based on the 2023 Modified Blended Treasury Rate (MBTR) during the 2023 deferral period, then the 2024 MBTR pending Commission approval for recovery. Once the deferral is approved for recovery and associated amortization, interest will continue to accrue at the 2024 MBTR until the amortization period is complete, similar to the Company's other amortization accounts.

CURRENT DEFERRAL AND AMORTIZATION BALANCES

As of June 30, 2023,[5] the outstanding balances for the Company's Natural Gas Decoupling Mechanism balancing accounts are:

Account 186328, Regulatory Liability Decoupling Deferral (Residential Group)	2023 Deferrals	($2,031,661.03)
Account 182329, Regulatory Asset Decoupling Deferral Prior Year (Residential Group)	2022 Deferrals	$644,884.96
Account 182328, Regulatory Asset Decoupling Deferral Approved for Recovery (Residential Group)	2021 Deferrals	$215,760.41
Sub-total Residential Group Balance 06/30/2023		($1,171,015.66)
Account 186338, Regulatory Liability Decoupling Deferral (Commercial Group)	2023 Deferrals	($3,341,451.28)
Account 182339, Regulatory Liability Decoupling Deferral Prior Year (Commercial Group)	2022 Deferrals	($222,760.18)
Account 182338, Regulatory Asset Decoupling Deferral Approved for Recovery (Commercial Group)	2021 Deferrals	$196,181.83
Sub-total Commercial Group Balance 06/30/2023		($3,368,029.63)
Total Decoupling Mechanism Balances at 06/30/2023		($4,539,045.29)

[5] See page 3 of the Q2 2023 Natural Gas Decoupling Mechanism Quarterly Report (Docket No. RG 78 (23)).

WHEREFORE, Avista Utilities respectfully requests that the Commission reauthorize the Company to defer the revenue related to the Natural Gas Decoupling Mechanism for the 12-month period, January 1, 2024 through December 31, 2024. The Company is not proposing an adjustment to customer's retail rates through this Application. Pursuant to OAR 800-027-0300(3)(e)(6), a copy of the Notice of Application and list of persons served with the Notice is attached to this Application as Exhibit A.

DATED this 31st day of October 2023.

Respectfully submitted,

Avista Utilities

By: ______*/s/ David Meyer*_________________

David J. Meyer, Vice President and Chief
Counsel for Regulatory and Governmental Affairs

Docket No. UM 1753

NOTICE OF APPLICATION FOR REAUTHORIZATION OF CERTAIN DEFERRAL ACCOUNTS

October 31, 2023

To All Parties Who Participated in UG 461:

Please be advised that on October 31, 2023, Avista Corporation, dba Avista Utilities ("Avista" or "Company"), applied to the Public Utility Commission of Oregon ("Commission") for an order reauthorizing the Company to utilize deferred accounting for its Natural Gas Decoupling Mechanism. This filing has been made pursuant to ORS 757.259 and OAR 860-027-0300(4).

This Notice is being provided to all parties that participated in Avista's most recent general rate case, Docket No. UG 461, to inform them that an Application for Reauthorization has been filed. Parties wanting more information or who wish to obtain a copy of the filing can access the Application on the Commission website, or by contacting either of the following:

Avista Utilities
Attn: Patrick Ehrbar
P.O. Box 3727
1411 E. Mission, MSC-27
Spokane, WA 99220-3727
(509) 495-8620

Public Utility Commission of Oregon
Attn: Filing Center
201 High Street SE, Suite 100
PO Box 1088
Salem, OR 97301-1088
(509) 373-0886

Any person may submit to the Commission written comments on this matter by November 22, 2023. Approval of Avista's Application will not authorize a change in the Company's rates, but will permit the Commission to consider allowing such deferred amounts in rates in a subsequent proceeding.

DATED this 31st day of October 2023.

By: ____*/s/David Meyer*___________

David J. Meyer, Vice President and Chief Counsel for Regulatory and Governmental Affairs