

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON
UG 389**

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:

Exhibit No.	Exhibit
Staff Exhibit 100	Opening Testimony of Marianne Gardner
Staff Exhibit 101	Witness Qualification Statement of Marianne Gardner
Staff Exhibit 102	Avista Response to Staff Data Request No. 152
Staff Exhibit 200	Opening Testimony of Heather B. Cohen
Staff Exhibit 201	Witness Qualification Statement of Heather B. Cohen
Staff Exhibit 202	Avista Response to Staff Data Requests
Staff Exhibit 203	Oregon Economic & Revenue Forecast, June 2020, All Urban Consumer Price Index
Staff Exhibit 300	Opening Testimony of Bret Farrell
Staff Exhibit 301	Witness Qualification Statement of Bret Farrell
Staff Exhibit 302	Workpaper Showing Adjustment Calculations for O&M
Staff Exhibit 303	Workpaper Showing Adjustment Calculations for A&G
Staff Exhibit 304	Workpaper Showing Adjustment Calculations for Atmospheric Testing
Staff Exhibit 305	Workpaper Showing Adjustment Calculations for Rate Case Expense

1	Staff Exhibit 306	No Adjustment Summary
2	Staff Exhibit 307	Avista Response to Staff Data Request No. 215
3	Staff Exhibit 400	Opening Testimony of John L. Fox
4	Staff Exhibit 401	Witness Qualification Statement of John L. Fox
5	Staff Exhibit 402	Compare UG 366 and UG 389 Forecasted Plant Additions
6	Staff Exhibit 403	Avista Response to Staff Data Requests
7	Staff Exhibit 500	Opening Testimony of Brian Fjeldheim
8	Staff Exhibit 501	Witness Qualification Statement of Brian Fjeldheim
9	Staff Exhibit 502	Gas Storage in Rate Base – Associated Avista workpaper and Responses to Staff Data Requests
10	Staff Exhibit 503	Gas Storage Operating Expense – Associated Avista workpaper and Responses to Staff Data Requests
11	Staff Exhibit 504	Other Gas Supply Expense and Purchased Gas Expense – Associated Avista workpaper and Responses to Staff Data Requests
12	Staff Exhibit 505	IT Projects – Associated Avista workpaper and Responses to Staff Data Requests
13	Staff Exhibit 506	Other Taxes – Associated Avista workpaper and Responses to Staff Data Requests
14	Staff Exhibit 507	Insurance and Risks – Associated Avista workpaper and Responses to Staff Data Requests - <i>Confidential</i>
15	Staff Exhibit 508	D&O Insurance – Associated Avista workpaper and Responses to Staff Data Requests - <i>Confidential</i>
16	Staff Exhibit 600	Opening Testimony of Scott Gibbens
17	Staff Exhibit 601	Witness Qualification Statement of Scott Gibbens
18	Staff Exhibit 700	Opening Testimony of Kathy Zarate
19	Staff Exhibit 701	Witness Qualification Statement of Kathy Zarate
20	Staff Exhibit 702	Avista Response to Staff Data Request Nos. 186, 187
21	Staff Exhibit 703	Avista Response to Staff Data Request No. 181

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1	Staff Exhibit 704	Avista Response to Staff Data Request No. 189
2	Staff Exhibit 800	Opening Testimony of Sabrina Soldavini
3	Staff Exhibit 801	Witness Qualification Statement of Sabrina Soldavini
4	Staff Exhibit 802	Avista Response to Staff Data Requests
5	Staff Exhibit 803	NARUC Cost Allocation Guidelines
6	Staff Exhibit 804	Avista Rule 20
7	Staff Exhibit 900	Opening Testimony of Ming Peng
8	Staff Exhibit 901	Witness Qualification Statement of Ming Peng
9	Staff Exhibit 902	Avista Response to Staff Data Request Nos. 122-132
10	Staff Exhibit 1000	Opening Testimony of Paul Rossow
11	Staff Exhibit 1001	Witness Qualification Statement of Paul Rossow
12	Staff Exhibit 1002	Adjustment Summary - <i>Confidential</i>
13	Staff Exhibit 1100	Opening Testimony of Max St. Brown
14	Staff Exhibit 1101	Witness Qualification Statement of Max St. Brown
15	Staff Exhibit 1102	LRIC-influenced development of Staff's Recommended Rate Spread
16	Staff Exhibit 1200	Opening Testimony of Mitchell Moore
17	Staff Exhibit 1201	Witness Qualification Statement of Mitchell Moore
18	Staff Exhibit 1202	Avista Response to Staff Data Request No. 269
19	Staff Exhibit 1300	Testimony in Support of Partial Settlement of Matt Muldoon, Moya Enright, and Curtis Dlouhy
20	Staff Exhibit 1301	Witness Qualification Statement of Matt Muldoon
21	Staff Exhibit 1302	Witness Qualification Statement of Moya Enright
22	Staff Exhibit 1303	Witness Qualification Statement of Curtis Dlouhy
23	Staff Exhibit 1304	Capital Structure - <i>Confidential</i>
24	Staff Exhibit 1305	Cost of LT Debt Tables and Maturity Profile - <i>Confidential</i>
25	Staff Exhibit 1306	ROE Peer Screening
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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

In the Matter of)	
)	
AVISTA CORPORATION, dba)	
AVISTA UTILITIES)	DECLARATION OF
)	HEATHER B. COHEN
Request for a General Rate Revision)	
_____)	

I, Heather Cohen, 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 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 14th day of October 2020.

Heather Cohen

 HEATHER B. COHEN

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

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

I, Moya Enright, 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 jointly drafted the pre-filed Staff testimony in support of the Partial Stipulation submitted for use in this docket as Staff Exhibit 1300 and drafted Staff Exhibit 1302 (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 16th day of October 2020.

/s/ Moya Enright
MOYA ENRIGHT

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

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

DECLARATION OF
CURTIS DLOUHY

I, Curtis Dlouhy, 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 jointly drafted the pre-filed Staff testimony in support of the Partial Stipulation submitted for use in this docket as Staff Exhibit 1300 and drafted Staff Exhibit 1303 (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 _14_ day of October 2020.

Curtis Dlouhy

CURTIS DLOUHY

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 389

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

DECLARATION OF
BRIAN FJELDHEIM

I, Brian Fjeldheim, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Financial 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 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 15th day of October 2020.

/s/ Brian Fjeldheim
BRIAN FJELDHEIM

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

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

I, Bret Farrell, state the following, under penalty of perjury in the State of Oregon:

1. I am a Utility and Energy Analyst 2 for the Public Utility Commission of Oregon Staff ("Staff"). I work in the Universal Service and Regulatory Analysis 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 22nd day of October 2020.



BRET FARRELL

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

In the Matter of)	
)	
AVISTA CORPORATION, dba)	
AVISTA UTILITIES)	DECLARATION OF
)	JOHN L. FOX
Request for a General Rate Revision)	
_____)	

I, John L. Fox, state the following, under penalty of perjury in the State of Oregon:

1. I am a Financial 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 400 and Staff Exhibit 401 (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 14th day of October 2020.



 JOHN L. FOX

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 389

In the Matter of)

AVISTA CORPORATION dba)

AVISTA UTILITIES,)

Request for a General Rate Revision.)

DECLARATION OF
MARIANNE GARDNER

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

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I have most recently worked as the Program Manager 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 100 and Staff Exhibit 101 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony is 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 15th day of September 2020.

/s/ Marianne Gardner

MARIANNE GARDNER

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

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

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 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 14th day of October 2020.

Scott Gibbens

 SCOTT GIBBENS

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 389

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

DECLARATION OF
MATTHEW J. MULDOON

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

1. I am the Economic Analysis Manager for the Public Utility Commission of Oregon Staff (“Staff”) in the Energy Rates, Finance and Audit Division.

2. On behalf of Staff, I jointly drafted the pre-filed Staff testimony in support of the Partial Stipulation 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 14 day of October 2020.

Matthew J. Muldoon
MATTHEW J. MULDOON

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

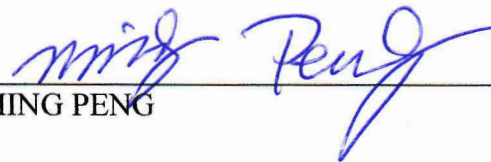
In the Matter of)	
)	
AVISTA CORPORATION, dba)	
AVISTA UTILITIES)	DECLARATION OF
)	MING PENG
Request for a General Rate Revision)	
_____)	

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

1. I am a Senior Econometrician 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 14th day of October 2020.



MING PENG

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 389

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

DECLARATION OF
PAUL ROSSOW

I, Paul Rossow, 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 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 1000 and Staff Exhibit 1001 (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 14th day of October 2020.

Paul Rossow /s/
PAUL ROSSOW

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

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

I, Sabrina Soldavini, state the following, under penalty of perjury in the State of Oregon:

1. I am a Senior Regulatory 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 14th day of October 2020.

Sabrina Soldavini

 SABRINNA SOLDAVINI

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 389

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

DECLARATION OF
MAX ST. BROWN

I, Max St. Brown, 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 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 20th day of October 2020.

_____/s/ Max St. Brown_____
MAX ST. BROWN

1
2 BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

3 UG 389

4 In the Matter of)
5)
6 AVISTA CORPORATION, dba)
AVISTA UTILITIES) DECLARATION OF
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 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 I hereby declare that the above statement is true to the best of my knowledge and
18 belief, and that I understand it is made for use as evidence in court and is subject to
penalty for perjury.

19 SIGNED this _14___ day of October 2020.

20
21 /s/____Kathy Zarate_____
KATHY ZARATE