

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON  
UG 461**

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 Matt Muldoon
Staff Exhibit 101	Written Public Comments
Staff Exhibit 200	Opening Testimony of Itayi Chipanera
Staff Exhibit 201	Witness Qualification Statement of Itayi Chipanera
Staff Exhibit 300	Opening Testimony of Michelle Scala
Staff Exhibit 301	Witness Qualification Statement of Michelle Scala
Staff Exhibit 302	Avista Responses to Staff Data Requests
Staff Exhibit 400	Opening Testimony of Bret Stevens
Staff Exhibit 401	Witness Qualification Statement of Bret Stevens
Staff Exhibit 402	Company Responses to Staff Data Requests
Staff Exhibit 403	Staff Work Paper
Staff Exhibit 500	Opening Testimony of Madison Bolton
Staff Exhibit 501	Witness Qualification Statement of Madison Bolton

1	Staff Exhibit 502	Avista Responses to Staff Data Requests
2	Staff Exhibit 503	Avista Response to Staff Data Request 288
3	Staff Exhibit 504	Staff Analysis of CPP Compliance Cost, Line Extension Cost
4	Staff Exhibit 600	Opening Testimony of Bret Farrell
5	Staff Exhibit 601	Witness Qualification Statement of Bret Farrell
6	Staff Exhibit 602	Avista Response to Staff Data Request 211
7	Staff Exhibit 700	Opening Testimony of Julie Jent
8	Staff Exhibit 701	Witness Qualification Statement of Julie Jent
9	Staff Exhibit 702	Avista Response to Staff Data Request 93
10	Staff Exhibit 703	Staff <i>Confidential</i> Wage and Salary Model
11	Staff Exhibit 800	Opening Testimony of Luz Mondragon
12	Staff Exhibit 801	Witness Qualification Statement of Luz Mondragon
13	Staff Exhibit 802	Avista Responses to Staff Data Requests
14	Staff Exhibit 900	Opening Testimony of Mitchell Moore
15	Staff Exhibit 901	Witness Qualification Statement of Mitchell Moore
16	Staff Exhibit 1000	Opening Testimony of Ming Peng
17	Staff Exhibit 1001	Witness Qualification Statement of Ming Peng
18	Staff Exhibit 1002	Avista Responses to Staff Data Requests
19	Staff Exhibit 1100	Opening Testimony of Kathy Zarate
20	Staff Exhibit 1101	Witness Qualification Statement of Kathy Zarate
21	Staff Exhibit 1102	Avista Responses to Staff Data Requests
22	Staff Exhibit 1200	Opening Testimony of August Ankum and Warren R. Fischer
23	Staff Exhibit 1201	Witness Qualification Statement of August Ankum
24	Staff Exhibit 1202	Witness Qualification Statement of Warren R. Fischer
25	Staff Exhibit 1203	Avista Responses to Staff Data Requests
26		

1	Staff Exhibit 1204	Staff Adjustments to Avista Allocations by FERC Account
2	Staff Exhibit 1205	Revisions to Avista's Supplemental Capital Additions Analysis
3	Staff Exhibit 1300	Opening Testimony of Melissa Nottingham, Scott Shearer, Bret Stevens
4	Staff Exhibit 1301	Witness Qualification Statement of Melissa Nottingham
5	Staff Exhibit 1302	Witness Qualification Statement of Scott Shearer
6	Staff Exhibit 1400	Opening Testimony of Bret Stevens and Robert Young
7	Staff Exhibit 1401	Witness Qualification Statement of Robert Young
8	Staff Exhibit 1402	Staff Revenue Requirement Adjustment Calculation
9	Staff Exhibit 1403	Avista Responses to Staff Data Requests

10           This Motion to Admit Pre-Filed Staff Exhibits is supported by Declarations of Staff  
11 witnesses August Ankum, Madison Bolton, Itayi Chipanera, Bret Farrell, Warren R. Fischer,  
12 Julie Jent, Luz Mondragon, Mitchell Moore, Matt Muldoon, Melissa Nottingham, Ming Peng,  
13 Michelle Scala, Scott Shearer, Bret Stevens, Robert Young, and Kathy Zarate. In each  
14 declaration, these witnesses attest to the truthfulness of their testimony. The Declarations are  
15 attached to this motion.

16           DATED this 30<sup>th</sup> day of August 2023.

17   Respectfully submitted,

18   ELLEN F. ROSENBLUM  
19   Attorney General

20   /s/ *Johanna M. Riemenschneider*

21   \_\_\_\_\_  
22   Johanna M. Riemenschneider, #990083  
23   Senior Assistant Attorney General  
24   Of Attorneys for Staff of the Public Utility  
25   Commission of Oregon  
26

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

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

DECLARATION OF  
AUGUST ANKUM

I, August Ankum, Ph.D, state the following, under penalty of perjury in the State of Oregon:

1. In this proceeding, I am a consultant for the Public Utility Commission of Oregon Staff (“Staff”). I am the Chief Economist and founding partner in QSI Consulting, Inc.

2. On behalf of Staff, I co-drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1200, 1204 and 1205 and I drafted Staff Exhibit 1201 (witness qualifications 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 22nd day of August 2023.

\_\_\_\_\_  
August Ankum, Ph.D.

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	MADISON BOLTON
Request for a General Rate Revision	)	
_____	)	

I, Madison Bolton, 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 work as a Senior Energy and Policy Analyst in the Utility Strategy and Integration Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 500, Staff Exhibit 501 (witness qualifications Statement) and Staff Exhibit 504 (analysis of CPP Compliance Costs and Line Extension Costs).

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 6th day of August 2023.



Madison Bolton

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	ITAYI CHIPANERA
Request for a General Rate Revision	)	
_____	)	

I, Itayi Chipanera, 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 work as a Senior Financial Analyst in the Accounting and Finance Section of the Rates, Safety, and Utility Performance Program.

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 qualifications 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 07 day of August 2023.



\_\_\_\_\_

Itayi Chipanera

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

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 employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Utility and Energy Analyst in the Utility Strategy and Integration 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 qualifications 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 August 2023.



Bret Farrell

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

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

DECLARATION OF  
WARREN R. FISCHER

I, Warren R. Fischer, CPA, CGMA, state the following, under penalty of perjury in the State of Oregon:

1. In this proceeding, I am a consultant for the Public Utility Commission of Oregon Staff (“Staff”). I am the Chief Financial Officer and a partner in QSI Consulting, Inc.

2. On behalf of Staff, I co-drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibits 1200, 1204 and 1205, and I drafted Staff Exhibit 1202 (witness qualifications 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 7th day of August 2023.



Warren R. Fischer, CPA, CGMA



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	JULIE JENT
Request for a General Rate Revision	)	
_____	)	

I, Julie Jent, 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 work as a Senior Utility Analyst in the Energy Cost Section of the Rates, Safety, and Utility Performance Program, formerly the 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, Staff Exhibit 701 (witness qualifications statement) and Staff Exhibit 703 (staff workpaper).

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 7 day of August 2023.

  
 \_\_\_\_\_  
 Julie Jent

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	LUZ MONDRAGON
Request for a General Rate Revision	)	
_____	)	

I, Luz Mondragon, 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 work as a Senior Financial Analyst in the Accounting and Finance Section of the Rates, Safety, and Utility Performance Program.

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 qualifications 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 7th day of August 2023.

*Luz Mondragon*  
 \_\_\_\_\_  
 Luz Mondragon

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	MITCHELL MOORE
Request for a General Rate Revision	)	
_____	)	

I, Mitchell Moore, 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 work as a Senior Utility Analyst in the Accounting and Finance Section of the Rates, Safety, and Utility Performance Program, formerly the 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 qualifications 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 \_22\_ day of August 2023.

\_\_\_/s/ Mitchell Moore\_\_\_\_\_

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	MATT MULDOON
Request for a General Rate Revision	)	
_____	)	

I, Matt Muldoon, 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 work as a Manager in the Accounting and Finance Section of the Rates, Safety, and Utility Performance Program.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 100. I am also a supporting witness for the joint testimony that pre-filed in support of the first and second stipulations, Exhibits Stipulating Parties/100, Stipulating Parties/102 (witness qualification statement) and Stipulating Parties/200.

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 21st day of August 2023.



\_\_\_\_\_  
Matt Muldoon

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	MELISSA NOTTINGHAM
Request for a General Rate Revision	)	
_____	)	

I, Melissa Nottingham, 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 work as the Manager in the Consumer Services Section of the Public Utility Commission.

2. On behalf of Staff, I co-drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1300, and drafted Staff Exhibit 1301 (witness qualifications 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 7 day of August 2023.

*Melissa Nottingham*

Melissa Nottingham

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

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 employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Economist in the Accounting and Finance Section of the Rates, Safety, and Utility Performance Program, formerly the 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 1000 and Staff Exhibit 1001 (witness qualifications 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 7th day of August 2023.



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

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	MICHELLE SCALA
Request for a General Rate Revision	)	
_____	)	

I, Michelle Scala, 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 work as the Energy Justice Program Manager in the Strategy and Integration 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 qualifications 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 07<sup>th</sup> day of August 2023.

Michelle Scala /s/

\_\_\_\_\_  
Michelle Scala

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

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

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

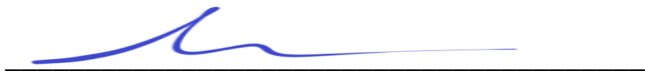
1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Utility Analyst in the Rates and Telecommunications Section of the Rates, Safety, and Utility Performance Program.

2. On behalf of Staff, I co-drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1300, and I drafted Staff Exhibit 1302 (witness qualifications 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 \_\_8th\_\_ day of August 2023.




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Scott Shearer



BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

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

DECLARATION OF  
BRET STEVENS

I, Bret Stevens, Ph.D, state the following, under penalty of perjury in the State of Oregon:

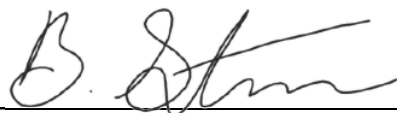
1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Economist in the Rates and Telecommunications Section of the Rates, Safety, and Utility Performance Program.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 400, Staff Exhibit 401 (witness qualifications statement) and Staff Exhibit 403 (staff workpapers). I also co-drafted Staff Exhibit 1300 and Staff Exhibits 1400 and 1402.

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 21 day of August 2023.



\_\_\_\_\_  
Bret Stevens, Ph.D

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

In the Matter of	)	
	)	
AVISTA CORPORATION dba	)	
AVISTA UTILITIES	)	DECLARATION OF
	)	ROBERT YOUNG
Request for a General Rate Revision	)	
_____	)	

I, Robert Young, state the following, under penalty of perjury in the State of Oregon:

1. In this proceeding, I am a consultant for the Public Utility Commission of Oregon Staff (“Staff”). I am the Managing Director at Economists.com, a consulting firm in Portland, Oregon.

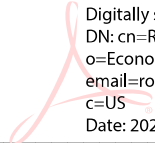
2. On behalf of Staff, I co-drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1400 and 1402 and I drafted Staff Exhibit 1401 (witness qualifications statement).

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 22 day of August 2023.

**Robert  
Young**



Digitally signed by Robert Young  
DN: cn=Robert Young,  
o=Economists.com, ou,  
email=robert@economists.com,  
c=US  
Date: 2023.08.22 12:37:19 -07'00'

Robert Young

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UG 461

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 employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Utility Economist in the Rates, Safety, and Utility Performance Program, formerly 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 qualifications 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 7 day of August 2023.

KATHY ZARATE  
Kathy Zarate