

Docket UM 2277  
Stipulating Parties Exhibit 100  
Peng, Andrews, and Mullins

BEFORE THE  
PUBLIC UTILITY COMMISSION OF OREGON

JOINT TESTIMONY OF MING PENG, ELIZABETH ANDREWS, AND BRADLEY MULLINS

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**In Support of the Stipulation for  
Implementation of Depreciation Rates**

JUNE 21, 2023

1           **Q.     Please state your names and positions.**

2           A.     My name is Ming Peng. I am employed by the Public Utility Commission of  
3 Oregon (“PUC” or “Commission”) as a Senior Economist in the Accounting and Finance Section  
4 of the Rates, Safety and Utility Performance Program (RSUP) and am appearing here on behalf of  
5 the Staff of the PUC (“Staff”). My witness qualification statement is set forth in an attachment to  
6 this testimony, Exhibit 101 - Staff Peng Witness Qualification.

7           My name is Elizabeth Andrews. I am employed by Avista Corporation (“Company” or  
8 “Avista”) as Senior Manager of Revenue Requirements in the Regulatory Affairs Department. My  
9 witness qualification statement is set forth in an attachment to this testimony, Exhibit 102.

10          My name is Bradley Mullins. I am testifying on behalf of the Alliance of Western Energy  
11 Consumers (“AWEC”). I am the Principal Consultant for MW Analytics, a consulting firm that  
12 represents large customers before state regulatory commissions in the West and Intermountain  
13 West. I have testified in over 100 regulatory proceedings, including before the Oregon Public  
14 Utility Commission. I have Master of Accounting degree from the University of Utah.

15          Hereafter, Staff, the Company, and AWEC will collectively be referred to as the  
16 “Stipulating Parties.”

17          **Q.     Are there any intervening parties in this docket that did not sign the**  
18 **Stipulation?**

19          A.     No, there are not. As such, the Stipulating Parties represent all parties in this  
20 proceeding as of the date of the Stipulation.

21          **Q.     What is the purpose of your joint testimony?**

22          A.     The purpose of our joint testimony is to describe and support the Stipulation  
23 between the Parties and the Company in Docket No. UM 2277 (Docket). The Stipulation, which

1 is concurrently filed (with attachments) as Exhibit 103 to this supporting testimony, resolves all  
2 issues in this case surrounding depreciation rates on common plant (Commonly held and used  
3 plant assets) and Oregon directly assigned plant.

4 **Q. Please summarize Avista’s depreciation study proposal.**

5 A. Avista’s depreciation rates determined as a result of the study are based on the  
6 straight-line method using the average service life procedure and were applied on a remaining life  
7 basis. The calculations in the study were based on attained ages and estimated average service life  
8 and net salvage for each depreciable group of assets.

9 On February 21, 2023, pursuant to Oregon Revised Statutes (ORS) 757.140 and 757.259,  
10 and OAR 860-001-0400 and 860-027-0300(4), the Company filed a petition requesting authority  
11 to revise its book depreciation rates using the results of a study recently undertaken by the  
12 Company.<sup>1</sup> That study, according to the Company, shows that the Oregon annual depreciation  
13 expense on the Company’s books should be increased by approximately \$762,252 (Oregon share),  
14 based on the average service life rates of natural gas plant in service as of December 31, 2021.  
15 The Company had also proposed to amortize a reserve adjustment over 5 years. The annual  
16 amortization of this reserve adjustment was a reduction to depreciation expense of \$277,672.  
17 Accordingly, the Company requested authorization to revise its depreciation rates to reflect this  
18 \$484,580 net increase in book depreciation expense.

19 **Q. Please summarize Avista’s proposed timeline to implement new depreciation**  
20 **rates.**

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<sup>1</sup> Avista hired Gannett Fleming, Inc. to undertake a depreciation study of its depreciable electric, gas and common plant that was completed in 2022. The objective of this assignment was to recommend depreciation rates to be utilized by Avista for accounting and ratemaking purposes.

1           A.     The Company initially requested that the Commission make its determination on  
2 depreciation rates by August 31, 2023, to implement the Oregon direct plant depreciation rates  
3 effective January 1, 2024, to coincide with the update to customers' rates from the Company's  
4 2023 general rate case filed March 1, 2023 in Docket No. UG-461 and to implement common plant  
5 depreciation rates effective September 1, 2023, to coincide with implementation of depreciation  
6 rates in Avista's other jurisdictions. Due to timing of the changes to common plant depreciation  
7 rates with the Company's other jurisdictions, the Company also requested that for common plant,  
8 the difference between depreciation expense under current book depreciation rates and  
9 depreciation expense under the updated depreciation rates be deferred for later recovery from  
10 customers in a subsequent rate proceeding.

11           **Q.     Please summarize the procedural history of this case.**

12           A.     On March 16, 2023, Staff of the Public Utility Commission of Oregon filed a  
13 motion to establish a procedural schedule for these proceedings and forgo an initial pre-hearing  
14 conference. On March 16, 2023, a memorandum was issued directing the parties to clarify the  
15 requested effective date for the allocated and direct plant depreciation rates. On March 20, 2023,  
16 Avista filed a response clarifying that it sought an effective date of January 1, 2024, for both  
17 allocated and direct plant depreciation rates. Staff convened a case workshop on April 14, 2023,  
18 and prepared an independent analysis of the Company's depreciation rates. The Parties convened  
19 for a settlement conference on May 25, 2023, and reached an agreement as to all issues in this  
20 case. The Parties in this Docket recognized the need for sufficient time for Staff and interested  
21 Parties to complete their review of the Company's depreciation study, and for the Commission to  
22 consider the terms of a proposed Stipulation. Accordingly, the Parties entered into a Stipulation  
23 that proposes to implement new depreciation rates for accounting purposes on Oregon direct plant

1 and common plant effective January 1, 2024. A copy of that Settlement Stipulation is filed  
2 concurrently with this supporting testimony, including an attachment that shows a complete list of  
3 all Avista depreciation parameters for all utility plant accounts by location FERC account.

4 **Q. Did Staff and other parties independently review the depreciation study?**

5 A. Yes. Staff's review was independent and comprehensive. Staff developed a set of  
6 proposed Iowa Curves, average service lives, and net salvage rates for each of the plant accounts,  
7 based on Staff's independent analysis of information provided by Avista and information  
8 otherwise available to Staff. Staff convened a case workshop on April 14, 2023. In order to get a  
9 better collective understanding of the characteristics of the plants, in a previous study in April 2018  
10 Staff visited the Company's facilities in Spokane Washington to investigate issues relating to gas  
11 mains; distribution lines; pipeline cost of removal; and gas and electrical meters. In June 2018,  
12 Staff visited Jackson Prairie Natural Gas Storage Facility in Lewis County, Washington to  
13 investigate issues relating to storage. These visits included engineer-guided tours and facilitated  
14 discussions regarding projected life and salvage. AWEC also performed an independent and  
15 comprehensive review of the study and Avista's filing.

16 **Q. What are Staff's study method, procedure, and technique for review?**

17 A. The annual depreciation rate is the ratio of plant costs, adjusted for net salvage value, that  
18 are allocated to a one-year period in accordance with a rational and consistent plan of allocation  
19 over the average service life of the property.

20 1. Method, Procedure, and Technique for Energy Depreciation Study:

- 21 • Straight-Line Method,
- 22 • Average Service Life Procedure (ASL), and

- 1 • Remaining Life Technique.

2 The review procedures include the selection of the capital recovery parameters of  
3 retirement dispersion, average service life projections for the future, salvage, and cost of  
4 removal projections for the future.

## 5 2. Estimating Survivor Curves and Projection Lives:

6 To model non-linear survival curves to calculate industrial asset survival ratios, Staff  
7 utilized the ‘Least Square Method’ of ‘Continuous Piecewise Linear’ Functions for curve  
8 fitting purposes. The smallest sum of squared differences is considered to be the best fit  
9 and to be indicative of average life and mortality dispersion of the account.

## 10 3. Estimating Net Salvage Rates:

11 Staff utilized the moving average (MA) analyses to study historical data. A moving average  
12 is a technical indicator that smooths out net salvage trends by filtering out the ‘Noise’ from  
13 short-term salvage fluctuations. The moving averages are used to identify trend direction  
14 and to determine the proper net salvage levels.

15 4. The following terminology (examples) explain the depreciation parameters:

16 a. Survivor Curve -Projection Life: For example, IOWA “46-R1.5” (or R1.5-46)  
17 means the Right-Modal IOWA Type “Survivor Curve” with 1.5 Degree of Dispersion that  
18 has 46-year “average service life”.

19 b. Net Salvage Rates: The “gross salvage of the property retired” less the “cost of  
20 removal”. For example: A -10% of net salvage rate means the investor intends to get 110%  
21 recovered from its 100% investment (100% investment +10% net salvage = 110%). Net  
22 Salvage is a component in the revenue requirement that the utility must earn to recover the  
23 cost of providing service, as well as earn a reasonable return on its investment.

1 5. Staff's proposed adjustments were based on (1) survival statistics, (2) net salvage percent, (3)  
2 industry statistics, (4) Company's in-house engineering opinions, and (5) Staff's industry  
3 expertise.

4 **Q. How did Avista and Staff analyze Iowa Curves and Average Service Lives?**

5 A. Both Avista and Staff utilized the actuarial plant balances methodology to analyze  
6 historical retirement data to help determine Iowa curves and average service lives for each  
7 depreciation group.

8 **Q. Please discuss Staff's analysis of Iowa Curves and Average Service Lives.**

9 A. Depreciation rates are derived from two depreciation parameters: (1) the  
10 combination of Survival Curve<sup>2</sup> and Projection Life (Curve-Life), and (2) Net Salvage Rates.<sup>3</sup> The  
11 Curve-Life parameter is the combination of Survivor Curve Type with Dispersion Indicator and  
12 Projection Life. Staff utilized the actuarial retirement rate methodology to analyze historical  
13 retirement data to help determine Iowa curves and average service lives for each depreciation  
14 group by FERC Account. On May 19, 2023, based on the case schedule, Staff issued a settlement  
15 proposal that included: 1. Agenda for Settlement; 2. Adjustment Overview; 3. Reasoning for  
16 Adjustment; 4. Review Methods; and 5. Adjustment Tables.

17 Staff independently reviewed and analyzed the UM 2277 AVA depreciation case study  
18 with 242 accounts, with the plant balance as of December 31, 2021. Staff accepts most accounts  
19 of the Company's filing; Staff made 7 account adjustments to Iowa curves and 12 account

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<sup>2</sup> "Survivor curves" means a curve that shows the number of units or cost of a given group which is surviving in service at given ages. The survivor curves were developed by the Engineering Research Institute of Iowa State University. These curves are frequently referred to as "Iowa Curves."

<sup>3</sup> Net salvage is the difference between gross salvage and cost of removal. Net salvage is positive when gross salvage exceeds the cost of removal and reduces the revenue requirement. Conversely, net salvage is negative when cost of removal exceeds gross salvage and increases the revenue requirement.

1 adjustments to net salvage rates. Staff utilizes the method of least squares for curve fitting  
2 purposes. The best fit in the least-squares method minimizes the Sum of Squared Residuals (SSR).  
3 Staff evaluated Avista's asset curve-life in a statistical model, finding that Staff proposed curves  
4 are better fit for the set of observations, and have less residual (SSR).

5 Staff supports longer service life for the assets. For example, for Staff's recommendation  
6 for Account 352.00 – Storage Wells, the Stipulating Parties agreed to utilize a R2.5-65 curve that  
7 reflected all the critical factors for life expectancies for AVA's account. For Account 354 -  
8 Compressor Station Equipment, the Stipulating Parties agreed to utilize a R2-55 curve that  
9 reflected all the critical factors for life expectancies for AVA's account.

10 **Q. Please discuss Staff's analysis of net salvage rates.**

11 A. Staff analyzed the net salvage rates submitted by Avista and examined the asset  
12 retirement activities by comparing year-by-year, three-year and five-year moving averages, as well  
13 as the most recent five and ten-year averages. Staff also used information gained during visits to  
14 plant facilities to evaluate asset retirement patterns and estimate net salvage rates.

15 For the FERC 300-level accounts, both Staff and Avista utilized the statistical methods of  
16 overall averages and rolling and shrinking band analyses to study historical data to help estimate  
17 net salvage characteristics. Staff supports a lower cost of removal level to the assets. For example,  
18 for Account 376 - Mains, under Distribution Plant, the Stipulating Parties agreed to utilize a  
19 negative 17 percent net salvage rate, which reduced the removal cost, and for Account 380 -  
20 Service, under Distribution Plant, the Stipulating Parties agreed to utilize a negative 23 percent net  
21 salvage rate, which the Parties agreed appropriately reflects the critical factors for these Accounts  
22 for purposes of settlement.

23 **Q. Did independent Staff analysis suggest adjustments to Avista's proposal?**



1           A.     Yes. Staff proposed two types of adjustments. The first type of adjustment  
2 concerned Iowa curves and projected average service lives. The second type of adjustment  
3 concerned net salvage rates. Based on Staff's independent review of Avista's depreciation  
4 statistics, Staff adjusted depreciation parameters for numerous depreciation groups.

5           **Q.     Were Staff and Avista able to resolve the study differences for the plant**  
6 **accounts?**

7           A.     Yes, the differences were resolved in a settlement meeting held on May 25, 2023,  
8 which also included AWEC. The Stipulating Parties recommend that the Commission adopt the  
9 concurrently filed Stipulation in its entirety. The Stipulation and its Attachment A explain the  
10 terms agreed to by the Stipulating Parties and also provide a table that details the straight line,  
11 remaining life, and average service life group depreciation rates derived for each depreciation  
12 group.

13           **Q.     Please discuss AWEC's review of Avista's Depreciation Study?**

14           A.     AWEC's review was primarily focused on the accounts that make up the largest  
15 portion of Avista's rate base and depreciation expense. Those accounts include FERC Account  
16 No. 376 Mains, FERC Account No. 380 Services, and FERC Account No. 381 Meters.

17           **Q.     What issue did AWEC identify with respect to Avista's Depreciation Study?**

18           A.     AWEC prepared an alternative depreciation study analysis for three accounts:  
19 Account 376 Mains; Account 380 Services; and, Account 381 Meters. Based on AWEC's  
20 analysis, it supported different average lives and survivor curve assumptions for these accounts  
21 relative to the accounts included in Avista's filed depreciation study. After detailed discussion of  
22 these accounts in settlement, Parties reached an agreement to use survivor curve parameters of 57-  
23 R3 for Account 376 Mains and survivor curve parameters of 54-R3 for Account 380 Services,

1 representing a reduced depreciation expenses for both accounts. Based on certain attributes of  
2 Account 381, Meters, and explanations Avista provided in settlement, AWEC was willing to  
3 accept Avista's filed depreciation curve parameters of 35-R1 for Account 381, Meters.

4 **Q. What is the final impact on estimated depreciation expense due to settlement**  
5 **discussions?**

6 A. The net annual difference in Oregon depreciation expense when comparing the  
7 Stipulation to the depreciation study as-filed is a reduction of approximately \$678,171.

8 **Q. Could you please describe the terms of the Stipulation?**

9 A. Yes. The Stipulating Parties have agreed to an overall Oregon decrease of \$193,591  
10 in the annual depreciation expense based on the plant balances at December 31, 2021. This  
11 represents a reduction of \$678,171 to Oregon depreciation expense on plant beyond what the  
12 Company had originally filed. Stipulation UM 2277, Attachment A sets forth the detailed account-  
13 by-account annual depreciation rates agreed to as part of the Stipulation, and UM 2277,  
14 Attachment B provides the Adjustment Parameter Comparison, Attachment C provides the Dollar  
15 Impact on Depreciation Expense.

16 The agreed-upon Oregon Direct depreciation rates set forth in this Stipulation shall be  
17 effective for accounting purposes on January 1, 2024, as proposed in the Company's direct filing.  
18 The agreed-upon common depreciation rates shall be effective January 1, 2024, if agreement can  
19 be made in the Company's other Washington and Idaho jurisdictions. The Stipulating Parties  
20 agreed to no changes to the proposed depreciation rates for common plant, however, if common  
21 plant depreciation rates are proposed to be changed in either Idaho or Washington, the Company  
22 will work with the Stipulating Parties to revisit the depreciation rates for common plant. In any  
23 event, the common plant depreciation rates will be implemented when approved in all three

1 jurisdictions, with deferral of the impact to depreciation expense for the months the new  
2 depreciation rates were not implemented. The Stipulation does not provide for the adjustment of  
3 customer rates.

4 Due to timing of the changes to common plant depreciation rates with the Company's other  
5 jurisdictions, the Parties agree that if depreciation rates are not implemented on and after January  
6 1, 2024 for common plant, the difference between depreciation expense under the current book  
7 depreciation rates and depreciation expense under the updated depreciation rates for the months  
8 the depreciation rates were not implemented be deferred for later recovery from customers in a  
9 subsequent rate proceeding.

10 The Stipulating Parties agree to the reserve adjustments that the Company proposed in the  
11 filed case. To achieve a more stable accrual for certain general plant accounts in the future, the  
12 Study recommended a five-year amortization to adjust unrecovered or over-recovered reserves  
13 based on the amortization period by account. For Oregon, the reserve adjustment is a reduction to  
14 expenses of \$277,672 annually for five years.

15 The Stipulating Parties also agreed that the Company will file a new depreciation study  
16 within five years from the filing date of this Docket. The attachment to the Stipulation provides  
17 detail of the affected plant accounts and specified depreciation rates reflecting the \$193,591  
18 reduction to depreciation expense.

19 **Q. What other terms are included in the Stipulation?**

20 A. The Stipulation in this docket represent negotiated compromises among the Parties.  
21 Thus, the Parties have agreed that no particular party shall be deemed to have approved the facts,  
22 principles, methods, or theories employed by any other in arriving at the Stipulation, and that the  
23 terms incorporated in the Stipulation should not be viewed as precedent setting in subsequent

1 proceedings. In addition, the Parties have the right to withdraw from the Stipulation if any material  
2 part is rejected or modified by the Commission.

3 **Q. Does the Stipulation represent a complete resolution of all issues in this**  
4 **docket?**

5 A. Yes, the Stipulation represents a complete resolution of all issues.

6 **Q. Why does PUC Staff and AWEC support the proposed revisions to the**  
7 **depreciation rates?**

8 A. The final adjustment decisions were made based on the combination of the  
9 considerations of Avista's plant retirement patterns and in-house engineering opinion, the industry  
10 average, and the experience of the analysts who reviewed the data. For the stipulated position on  
11 plant asset survivor curves-projection life, the net salvage rates reflected in the depreciation rates  
12 are consistent with the results of Staff's and AWEC's thorough review and valuation of plant asset  
13 by depreciation groups. Accordingly, it is the view of all Stipulating Parties that the stipulated  
14 adjustment represents a fair and reasonable level of depreciation expenses to be included in  
15 depreciation rates.

16 **Q. What do the Parties recommend regarding the Stipulation?**

17 A. The Parties recommend that the Commission adopt the Stipulation in its entirety.

18 **Q. Does that complete your joint testimony in this proceeding?**

19 A. Yes, it does.

### WITNESS QUALIFICATIONS STATEMENT

NAME: Ming Peng (Ms.)

EMPLOYER: Public Utility Commission of Oregon

TITLE: Senior Economist  
Energy Rates, Finance and Audit Division

ADDRESS: 201 High Street SE. Suite 100  
Salem, OR. 97301

EDUCATION & TRAINING:

M.S. Applied Economics  
University of Idaho, Moscow

B.S. Statistics  
People's University of China, Beijing

C.R.R.A. Certified Rate of Return Analyst  
Society of Utility and Regulatory Financial Analysts

Depreciation studies – the Society of  
Depreciation Professionals

NARUC Annual Regulatory Studies Program  
Michigan State University, East Lansing

350+ credit hours on 30+ topics trainings in public utility industry

EXPERIENCE: 1/11/1999 – Present, Public Utility Commission of Oregon

I have been employed by the Public Utility Commission of Oregon (Commission) for 19 years since January 1999. My roles include:

Expert Witness, Case Manager, Economist, Policy Analyst,  
Econometrician, and Principal Analyst

I have testified in various formal state hearings and performed numerous analyses including economic, financial, statistical, mathematical, marketing, and policy analyses in public utility industry.

Principal Analyst & Case Manager, Settlement Lead / Negotiator for Depreciation and Ratemaking:

I have served as a Principal Analyst and Case Manager for the determination of Energy Property Depreciation Rates (Oregon Revised Statute 757.140) for past 10 years. This had a strong focus on Depreciation Rate Determination (fixed

cost allocation, and capital recovery), I was also a Principal Analyst and Case Manager for the determination of Energy Property Depreciation Rates (Oregon Revised Statute 757.140) in this time period.

In this position, I investigate, analyze and calculate “Energy Asset Retirement Cost & Impact” and “Power Plant Decommissioning Cost & Impact” on Customer Rates. I review, calculate, analyze fixed asset depreciation and propose depreciation parameters for each of FERC accounts on Generation, Transmission, Distribution, General, and Coal Mining Plants. The energy sources I have worked on are Steam/Coal, Hydraulic, Natural Gas, Wind, Solar and Geothermal.

My analyses of “Power-Plant-Shutdown” activities include the following cases:

1. PGE closes Boardman Coal-fired plant (UM 1679 & UE 215),
2. PacifiCorp closes Carbon Coal Plant in Utah (UE 246)
3. Multi-state PacifiCorp Klamath Hydro Dam Removal Cost recovery for (1) J. C. Boyle Dam, (2) Copco 1 Dam, (3) Copco 2 Dam, and (4) Iron Gate Dam removal under the ORS 757.734 – Recovery of investment in Klamath River dams in OPUC UE 219.
4. Idaho Power Valmy Coal-fired power plant Shutdown (UE 316)
5. PGE Colstrip Coal-fired power plant Shutdown (UM 1809)

I conduct case investigation and analysis on Utility’s filings, make rate adjustments, lead settlement negotiation, prepare testimony, and appear on behalf of the Commission. The energy companies I work with are: (1) PacifiCorp (serves 6 states), (2) PGE, (3) Northwest Natural Gas (NWN), (4) Idaho Power, (5) Avista Corp (Washington), and (6) Cascade Gas (CNG, Montana).

#### Lead Analyst and Case Manager on Financial Dockets:

Prior to my present position, I was a lead analyst and case manager for cost of capital for nine years. I reviewed market risks, derivatives and hedging, debt issuance and stock flotation. My analysis directly informed utility and energy policy.

I advised the Commission on over 60 financial dockets. In most cases the Commission incorporated my recommendations into final orders.

I was certified by the “Society of Utility and Regulatory Financial Analysts”, as a “Certified Rate of Return Analyst” in 2002.

#### Public Utility & Policy Analyst:

Rulemaking: I have formulated energy regulation rules for utility performance incentives and cost-of-service regulation.

Energy Utility Merger & Acquisition: I have testified in formal state hearings involving utility mergers & acquisitions. I conducted Acquisition

Premiums & Credit Risk Analysis and testified on behalf of the Commission in MidAmerican Energy Company's application to purchase PacifiCorp. I also reviewed Scottish Power's earlier purchase of PacifiCorp, and PGE's emergence from Enron, after the Enron bankruptcy.

Integrated Resource Planning (IRP, Least Cost Planning): I provided comments on "Boardman to Hemingway Transmission Line Project (B2H, a 500-kV power line from NE Oregon to SW Idaho)" to the Commission for the decision-making that including cost and benefit list, pros and cons list, alternatives, and the legal risks.

Clean Energy – Dollar Impact on Customer Rates: I have analyzed and calculated the rate impact and comparative advantage of clean energy.

General Ratemaking: I have forecasted electric generation fuel prices, determined costs and benefits of property sales, and forecasted loads. My weather normalizations have been used in both rate cases and in integrated resource planning.

Survey Sampling Design: Results of my statistical sampling and procurement design are incorporated into my revenue requirement testimony in Commission Docket No. UM 1288.

Auditing: I audited energy utility cost of capital and finance component in operation audits. My "Interest Rate and Late Payment Charge" Survey and Analysis are published annually for the State of Oregon (UM 779).

Survey for Market Competition & Economic Policy: I conducted and wrote the report on Telecommunications "Market Competition and Economic Policy Survey Analysis" for House Bill 2577. This report has been published on the OPUC web annually for 15 years.

#### Mentor in the ICER - International Confederation of Energy Regulators

I was selected to act as a mentor in the ICER (International Confederation of Energy Regulators) Women in Energy (ICER WIE) pilot mentoring program. My "Mentoring Topics" focus on Incentive Regulation; Rate and Economic Impacts of "Cost-of-Service" regulation in the U.S. and "Price-Cap Performance Based Regulation" in Europe; Cost of Capital, Energy Demand and Price Forecasting Modeling; Least Cost Planning; and Regulatory Policy, and Renewable Energy issues within regulated rate structures.

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2277

In the Matter of )  
 )  
AVISTA CORPORATION, dba )  
AVISTA UTILITIES, )  
 )  
Petition Requesting )  
Authority to Revise Its Book Depreciation )  
Rates and Deferred Accounting )

**EXHIBIT AVISTA/101**

**QUALIFICATIONS OF ELIZABETH M. ANDREWS**

**JUNE 22, 2023**



**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS**

A. Elizabeth M. Andrews. My business address is 1411 E. Mission Avenue, Spokane, WA 99202.

**Q. PLEASE STATE YOUR OCCUPATION.**

A. I am employed by Avista Corporation as Senior Manager of Revenue Requirements in the Regulatory Affairs Department.

**Q. PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND WORK EXPERIENCE.**

A. I am a 1990 graduate of Eastern Washington University with a Bachelor of Arts Degree in Business Administration, majoring in Accounting. That same year, I passed the November Certified Public Accountant exam, earning my CPA License in August 1991. I worked for Lemaster & Daniels, CPAs from 1990 to 1993, before joining the Company in August 1993. I served in various positions within the sections of the Finance Department, including General Ledger Accountant and Systems Support Analyst until 2000. In 2000, I was hired into the State and Federal Regulation Department, now Regulatory Affairs, as a Regulatory Analyst until my promotion to Manager of Revenue Requirements in early 2007, and later promotion to Senior Manager of Revenue Requirements. I have also attended several utility accounting, ratemaking and leadership courses.

**Q. HAVE YOU EVER TESTIFIED BEFORE A REGULATORY BODY?**

A. Yes. I have sponsored testimony on revenue requirements in Oregon, Washington and Idaho as a part of the Company's general rate case proceedings.

**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

UM 2277

In the Matter of	)	
	)	
AVISTA CORPORATION, dba	)	STIPULATED AGREEMENT
AVISTA UTILITIES,	)	
	)	
Petition Requesting	)	
Authority to Revise Its Book Depreciation	)	
<u>Rates and Deferred Accounting</u>	)	

This Stipulation is entered into for the purpose of implementing Avista Corporation’s (Avista or the Company) book depreciation rates for Oregon direct plant effective January 1, 2024, and for common plant that is allocated to Oregon coincident with the change in depreciation rates of common plant in Washington and Idaho jurisdictions. The Company initially requested an implementation date of September 1, 2023, for common plant with deferral of the depreciation expense difference between expense calculated using the current depreciation rates and the updated depreciation rates. The Stipulating Parties agreed to no changes to the proposed depreciation rates for common plant; however, if common plant depreciation rates are proposed to be changed in either Idaho or Washington, the Company will work with the Stipulating Parties to revisit the depreciation rates for common plant. In any event, the common plant depreciation rates will be implemented when approved in all three jurisdictions, with deferral of the impact to depreciation expense for the months the new depreciation rates were not implemented.

## **PARTIES**

The Parties to this Stipulation are Avista, the Staff of the Public Utility Commission of Oregon (Staff), and the Alliance of Western Energy Consumers (AWEC), (collectively the “Stipulating Parties”), representing all parties to this proceeding as of the date of this Stipulation.

## **BACKGROUND**

1. On February 21, 2023, Avista filed a petition requesting authority to revise its book depreciation rates and a proposal for deferral of the effects of changes in depreciation rates once those rates are approved by the Commission, pursuant to OAR 860-027-0350, which requires each energy utility to file with the Commission an updated depreciation study at least once every five years, and ORS 757.140, which requires each public utility to carry a proper and adequate depreciation account, and to conform its depreciation accounts to the rates so ascertained and determined by the Commission. The Commission may make changes in such rates of depreciation from time to time as the Commission may find necessary.

2. The objective of this Study was to recommend depreciation rates to be utilized by Avista for accounting and ratemaking purposes. Further, sound accounting practice dictates periodic updates to depreciation rates to recognize additions to investment in plant assets and to reflect changes in asset characteristics, technology, salvage, removal costs, life span estimates and other factors that impact depreciation rate calculations. The depreciation rates approved by the Commission in 2019 were developed from a study based on depreciable plant balances as of December 31, 2016. Similar to these preceding studies, the annual accrual rates proposed in this filing were primarily calculated in accordance with the straight-line method of depreciation, using

the average service life procedures and the remaining life basis, based on estimates which reflect considerations of historical evidence and expected future conditions.

3. In this depreciation study, depreciation rates were derived from two depreciation parameters: (1) the combination of Survival Curve<sup>1</sup> and Projection Life (Curve-Life), and (2) Net Salvage Rates.<sup>2</sup> The Curve-Life parameter is the combination of Survivor Curve Type with Dispersion Indicator and Projection Life.

4. The Company requested authorization to revise its book depreciation rates consistent with the results of a depreciation study recently undertaken by the Company.<sup>3</sup> That study showed that the annual depreciation expense recorded on the Company's books should be increased by approximately \$762,252 (Oregon share) based on the average service life rates of natural gas plant in service as of December 31, 2021, that is directly assigned and allocated to Oregon.<sup>4</sup>

5. National Association of Regulatory Utility Commissioners (NARUC) in Depreciation Expense And Its Effect On The Utility's Financial Performance - Revenue Requirements<sup>5</sup>, states: "Depreciation has a profound effect on the revenue requirement of a utility, and for many utilities, depreciation expense represents a large percentage of total operating expenses. In addition, deferred income taxes, rate base, and cost of capital are all affected by the depreciation practices of a utility." The Company requested that the Commission make its determination on depreciation rates by August 31, 2023, to implement the Oregon direct plant

<sup>1</sup> "Survivor curves" means a curve that shows the number of units or cost of a given group which is surviving in service at given ages. The survivor curves were developed by the Engineering Research Institute of Iowa State University. These curves are frequently referred to as "Iowa Curves."

<sup>2</sup> Net salvage is the difference between gross salvage and cost of removal. Net salvage is positive when gross salvage exceeds the cost of removal and reduces the revenue requirement. Conversely, net salvage is negative when cost of removal exceeds gross salvage and increases the revenue requirement.

<sup>3</sup> Avista hired Gannett Fleming, Inc. to undertake a depreciation study of its depreciable electric, gas and common plant in service. The study was completed in 2022. The objective of this assignment was to recommend depreciation rates to be utilized by Avista for accounting and ratemaking purposes.

<sup>4</sup> The Company had also proposed to amortize a reserve adjustment over 5 years. The annual amortization of this reserve adjustment was a reduction to depreciation expense of \$277,672.

<sup>5</sup> NARUC, Public Utility Depreciation Practices, p.195 (1996).

depreciation rates effective January 1, 2024, to coincide with the update to customers' rates from the Company's 2023 general rate case filed March 1, 2023 in Docket No. UG-461. Due to timing of the changes to common plant depreciations rates with the Company's other jurisdictions, the Company also requested for common plant that the difference between depreciation expense under current book depreciation rates and depreciation expense under the updated depreciation rates, be deferred for later recovery from customers in a subsequent rate proceeding.

6. Avista is a utility that also provides service to electric and natural gas customers in eastern Washington and northern Idaho, in addition to its natural gas customers in Oregon. The Company also filed depreciation studies in its other jurisdictions under Docket Nos. UE-230123 and UG-230130 in Washington and Docket Nos. AVU-E-23-02 and AVU-G-23-02 in Idaho. These cases are still being reviewed in those jurisdictions.

7. The Stipulating Parties recognized the need for sufficient time for Staff and interested Parties to complete their review of the Company's depreciation study, and for the Commission to consider this Stipulation. This Stipulation provides for implementation of new Oregon direct plant depreciation rates for accounting purposes effective January 1, 2024, and for common plant to become effective when Washington's and Idaho's common plant depreciation rates become effective.

8. Approval of this Stipulation would provide for the opportunity to simultaneously implement new depreciation rates for accounting purposes for common plant in all three jurisdictions in which Avista serves: Oregon, Washington, and Idaho. Allowing Oregon common depreciation rate changes to be effective for accounting purposes at the same time as the other two jurisdictions will synchronize the timing of the Company's common depreciation accounting changes for the three states and alleviate the administrative burden.

9. On May 25, 2023, a settlement conference was held and attended by the Stipulating Parties. At that settlement conference, the Stipulating Parties reached agreement on revisions to the Company's book depreciation rates. The Company requested a \$762,252 depreciation increase, Parties settled at an \$84,081 depreciation increase, a reduction of \$678,171 from that proposed by the Company. If ultimately approved by the Commission, such rates would constitute depreciation rates, which would be effective for accounting purposes on January 1, 2024, for Oregon direct plant.

### **AGREEMENT**

10. This Stipulation resolves all issues regarding the changes to the Company's depreciation rates proposed in the Depreciation Study.

11. The Stipulating Parties agree that this Stipulation provides for the implementation of updated depreciation rates for accounting purposes only and does not provide for adjustments to customer rates. As noted above, Avista used the depreciation rates proposed in the Study in the current general rate case before this Commission. Avista agrees to update the depreciation rates agreed to in this Stipulation, if approved by the Commission, as the basis for its depreciation rates in the Company's current general rate case proceeding before this Commission and will ultimately be included in customer's rates through that proceeding.

12. The Stipulating Parties have agreed to book depreciation rates on directly assigned (Oregon) plant effective January 1, 2024, and common plant when effective in all three jurisdictions. The Parties to this Agreement have agreed to the depreciation rates, as shown in Attachment A - System Summary to this Stipulation. That attachment provides detail of all plant accounts reviewed in the Study, which has been updated for changes agreed to by the Stipulating Parties in Oregon, with Summary of Estimated Survivor Curve, Net Salvage Percent, Original

Cost, Book Depreciation Reserve and Calculated Annual Depreciation Accruals Related To Electric, Gas and Common Plant as of December 31, 2021. The Company has also provided the data used to calculate the depreciation rates as originally filed and as settled in Attachment B - Adjustment Parameter Comparison for plant assigned or allocated to Oregon and Attachment C - Dollar Impact on Depreciation Expense.

13. The Stipulating Parties agree to the reserve adjustments that the Company proposed in the filed case. To achieve a more stable accrual for certain general plant accounts in the future, the Study recommended a five-year amortization to adjust unrecovered or over-recovered reserves based on the amortization period by account. For Oregon, the reserve adjustment is a reduction to expenses of \$277,672 annually for five years. The result of the agreed-upon depreciation/amortization rates is an overall decrease of approximately \$193,591 to depreciation expense based upon plant balances at December 31, 2021.

14. The Stipulating Parties agree, as required by OAR 860-027-0350, the Company will file a new depreciation study within five years of the original filing date in this application.

15. The Stipulating Parties agree that this Stipulation is in the public interest and results in an overall fair, just and reasonable outcome.

16. The Stipulating Parties agree this Stipulation represents a compromise in the positions of the Parties. By entering into this Stipulation, no Party shall be deemed to have approved, admitted, or consented to the facts, principles, methods, or theories employed by any other Party in arriving at the terms of this Stipulation other than as specifically identified in this Stipulation. No Party shall be deemed to have agreed that any provision of this Stipulation is appropriate for resolving the issues in any other proceeding.

17. The Stipulating Parties agree that, consistent with OAR 860-001-0350(3), conduct, statements, and documents disclosed in the negotiation of this Stipulation shall not be admissible as evidence in this or any other proceeding unless independently discoverable or offered for other purposes allowed under ORS 40.190.

18. This Stipulation sets forth the entire agreement between the Stipulating Parties and supersedes any and all prior communications, understandings, or agreements, oral or written, between the Parties pertaining to the subject matter of this Stipulation.

19. This Stipulation will be offered into the record in this proceeding as evidence pursuant to OAR 860-001-0350(7). The Stipulating Parties agree to support this Stipulation throughout this proceeding and any appeal. The Stipulating Parties further agree to provide witnesses to sponsor this Stipulation in testimony, briefing and at the hearing, or, in a Party's discretion, to provide a representative at the hearing authorized to respond to the Commission's questions on the Party's position as may be appropriate.

20. If this Stipulation is challenged, the Stipulating Parties reserve the right to cross-examine witnesses and put on such case as they deem appropriate to respond fully to the issues presented, including the right to raise issues that are incorporated in the settlement embodied in this Stipulation. Notwithstanding this reservation of rights, the Stipulating Parties agree that they will continue to support the Commission's adoption of the terms of this Stipulation.

21. The Stipulating Parties have negotiated this Stipulation, including its attachments, as an integrated document. If the Commission rejects all or any material part of this Stipulation or imposes additional material conditions in approving the Stipulation, any Party disadvantaged by such action shall have the right to withdraw from this Stipulation, pursue their rights under OAR 860-001-0350(9), and/or seek reconsideration or appeal of the Commission's order in



accordance with OAR 860-001-0720. However, prior to withdrawal, the Party shall engage in good faith negotiation with the other Stipulating Parties. No Party withdrawing from this Stipulation shall be bound to any position, commitment, or condition of this Stipulation. In the event any Party withdraws from the Stipulation, then no part of the Stipulation may be offered or admitted into evidence in any proceeding. This Stipulation may be executed in counterparts and each signed counterpart shall constitute an original document. The Stipulating Parties further agree that any electronic signature of a Party is valid and binding to the same extent as an original signature.

22. This Stipulation may not be modified or amended except by written agreement among all Parties who have executed it.

This Stipulation is entered into by each Party on the date entered below such Party's signature.

DATED this 21<sup>st</sup> day of June 2023

AVISTA CORPORATION

STAFF OF THE PUBLIC UTILITY  
COMMISSION OF OREGON

*Patrick Ehrbar for*  
By: David Meyer  
Date: June 21, 2023

By: \_\_\_\_\_  
Date: \_\_\_\_\_

ALLIANCE OF WESTERN ENERGY  
CONSUMERS

By: \_\_\_\_\_  
Date: \_\_\_\_\_

accordance with OAR 860-001-0720. However, prior to withdrawal, the Party shall engage in good faith negotiation with the other Stipulating Parties. No Party withdrawing from this Stipulation shall be bound to any position, commitment, or condition of this Stipulation. In the event any Party withdraws from the Stipulation, then no part of the Stipulation may be offered or admitted into evidence in any proceeding. This Stipulation may be executed in counterparts and each signed counterpart shall constitute an original document. The Stipulating Parties further agree that any electronic signature of a Party is valid and binding to the same extent as an original signature.

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DATED this \_\_\_\_\_ day of June 2023

AVISTA CORPORATION

STAFF OF THE PUBLIC UTILITY  
COMMISSION OF OREGON

By: \_\_\_\_\_

By: Johanna Riemenschneider

Date: \_\_\_\_\_

Date: June 20, 2023

ALLIANCE OF WESTERN ENERGY  
CONSUMERS

By: \_\_\_\_\_

Date: \_\_\_\_\_

accordance with OAR 860-001-0720. However, prior to withdrawal, the Party shall engage in good faith negotiation with the other Stipulating Parties. No Party withdrawing from this Stipulation shall be bound to any position, commitment, or condition of this Stipulation. In the event any Party withdraws from the Stipulation, then no part of the Stipulation may be offered or admitted into evidence in any proceeding. This Stipulation may be executed in counterparts and each signed counterpart shall constitute an original document. The Stipulating Parties further agree that any electronic signature of a Party is valid and binding to the same extent as an original signature.

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DATED this \_\_\_\_\_ day of June 2023

AVISTA CORPORATION

STAFF OF THE PUBLIC UTILITY  
COMMISSION OF OREGON

By: \_\_\_\_\_

By: \_\_\_\_\_

Date: \_\_\_\_\_

Date: \_\_\_\_\_

ALLIANCE OF WESTERN ENERGY  
CONSUMERS

By: Chad Stokes  \_\_\_\_\_

Date: 6/21/2023 \_\_\_\_\_

UM 2277  
Settlement Depreciation Summary

Attachment A

AVISTA CORPORATION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC, GAS AND COMMON PLANT AS OF DECEMBER 31, 2021

DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)		
							AMOUNT (8)	RATE (9)=(8)/(5)			
<b>ELECTRIC PLANT</b>											
<b>STEAM PRODUCTION PLANT</b>											
310.30	REMOVING OTHER PROPERTY KETTLE FALLS	12-2038	SQUARE	*	0	138,174.50	125,750	12,424	731	0.53	17.0
310.40	EASEMENTS, PERMITS KETTLE FALLS	12-2038	SQUARE	*	0	289,111.15	13,891	275,220	16,190	5.60	17.0
311.00	STRUCTURES AND IMPROVEMENTS KETTLE FALLS	12-2038	75-S1.5	*	(5)	25,288,272.19	20,848,866	5,703,820	348,470	1.38	16.4
	COLSTRIP 3 AND COMMON - IDAHO	12-2027	75-S1.5	*	(3)	20,152,736.08	17,033,081	3,724,237	628,559	3.12	5.9
	COLSTRIP 3 AND COMMON - WASHINGTON	12-2025	75-S1.5	*	(3)	38,012,944.07	33,399,934	5,753,398	1,449,596	3.81	4.0
	COLSTRIP 4 - IDAHO	12-2027	75-S1.5	*	(4)	18,776,415.30	16,470,119	3,057,353	516,203	2.75	5.9
	COLSTRIP 4 - WASHINGTON	12-2025	75-S1.5	*	(4)	35,416,973.94	31,014,115	5,819,538	1,467,440	4.14	4.0
	TOTAL ACCOUNT 311.00					137,647,341.58	118,766,116	24,058,346	4,410,268	3.20	
311.10	STRUCTURES AND IMPROVEMENTS - LANDFILL KETTLE FALLS	12-2038	55-S3	*	0	3,648,851.16	3,038,704	610,147	38,406	1.05	15.9
312.00	BOILER PLANT EQUIPMENT KETTLE FALLS	12-2038	55-R1	*	(5)	46,801,695.60	30,014,114	19,127,656	1,228,371	2.62	15.6
	COLSTRIP 3 AND COMMON - IDAHO	12-2027	55-R1	*	(3)	30,424,801.13	24,656,421	6,681,124	1,145,757	3.77	5.8
	COLSTRIP 3 AND COMMON - WASHINGTON	12-2025	55-R1	*	(3)	55,960,862.78	48,277,491	9,362,198	2,382,606	4.26	3.9
	COLSTRIP 4 - IDAHO	12-2027	55-R1	*	(4)	21,565,585.25	15,930,270	6,497,938	1,110,174	5.15	5.9
	COLSTRIP 4 - WASHINGTON	12-2025	55-R1	*	(4)	39,391,891.53	29,725,202	11,242,365	2,857,319	7.25	3.9
	TOTAL ACCOUNT 312.00					194,144,826.29	148,603,498	52,911,281	8,724,227	4.49	
313.00	ENGINES AND ENGINE-DRIVEN GENERATORS COLSTRIP 3 AND COMMON - IDAHO	12-2027	50-R2.5	*	(3)	175,460.65	12,394	168,331	28,150	16.04	6.0
	COLSTRIP 3 AND COMMON - WASHINGTON	12-2025	50-R2.5	*	(3)	333,122.65	37,119	305,997	76,692	23.02	4.0
	COLSTRIP 4 - IDAHO	12-2027	50-R2.5	*	(4)	11,394.29	7,824	4,026	673	5.91	6.0
	COLSTRIP 4 - WASHINGTON	12-2025	50-R2.5	*	(4)	21,082.72	26,479	(4,553)	0	-	-
	TOTAL ACCOUNT 313.00					541,060.31	83,816	473,801	105,515	19.50	
314.00	TURBOGENERATORS KETTLE FALLS	12-2038	37-R0.5	*	(5)	18,632,088.90	12,184,298	7,379,396	519,785	2.79	14.2
	COLSTRIP 3 AND COMMON - IDAHO	12-2027	37-R0.5	*	(3)	8,330,808.18	6,553,849	2,026,883	357,021	4.29	5.7
	COLSTRIP 3 AND COMMON - WASHINGTON	12-2025	37-R0.5	*	(3)	15,714,353.74	11,703,630	4,482,154	1,166,375	7.42	3.8
	COLSTRIP 4 - IDAHO	12-2027	37-R0.5	*	(4)	6,018,100.91	3,693,446	2,565,379	451,000	7.49	5.7
	COLSTRIP 4 - WASHINGTON	12-2025	37-R0.5	*	(4)	11,361,051.53	6,781,484	5,034,010	1,304,756	11.48	3.9
	TOTAL ACCOUNT 314.00					60,056,403.26	40,916,707	21,487,822	3,798,937	6.33	
315.00	ACCESSORY ELECTRIC EQUIPMENT KETTLE FALLS	12-2038	50-S1	*	(5)	12,596,049.01	7,191,500	6,034,352	393,987	3.13	15.3
	COLSTRIP 3 AND COMMON - IDAHO	12-2027	50-S1	*	(3)	3,875,940.31	2,994,762	997,457	171,477	4.42	5.8
	COLSTRIP 3 AND COMMON - WASHINGTON	12-2025	50-S1	*	(3)	7,383,244.12	5,822,711	1,782,030	453,740	6.15	3.9
	COLSTRIP 4 - IDAHO	12-2027	50-S1	*	(4)	2,677,756.92	2,027,692	757,176	130,650	4.88	5.8
	COLSTRIP 4 - WASHINGTON	12-2025	50-S1	*	(4)	4,986,641.55	3,872,925	1,313,182	335,999	6.74	3.9
	TOTAL ACCOUNT 315.00					31,519,631.91	21,909,590	10,884,197	1,485,853	4.71	
316.00	MISCELLANEOUS POWER PLANT EQUIPMENT KETTLE FALLS	12-2038	60-R2	*	(5)	2,476,959.19	2,016,977	583,830	37,593	1.52	15.5
	COLSTRIP 3 AND COMMON - IDAHO	12-2027	60-R2	*	(3)	3,492,590.38	3,046,999	550,369	93,305	2.67	5.9
	COLSTRIP 3 AND COMMON - WASHINGTON	12-2025	60-R2	*	(3)	6,589,238.92	5,622,305	1,164,611	294,747	4.47	4.0
	COLSTRIP 4 - IDAHO	12-2027	60-R2	*	(4)	1,574,284.71	1,370,875	266,381	45,390	2.88	5.9
	COLSTRIP 4 - WASHINGTON	12-2025	60-R2	*	(4)	2,968,698.76	2,518,314	569,133	144,458	4.87	3.9
	TOTAL ACCOUNT 316.00					17,101,771.96	14,575,471	3,134,324	615,493	3.60	
<b>TOTAL STEAM PRODUCTION PLANT</b>						<b>445,087,172.12</b>	<b>348,033,543</b>	<b>113,847,562</b>	<b>19,195,620</b>	<b>4.31</b>	

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Settlement Depreciation Summary

Attachment A

AVISTA CORPORATION

TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC, GAS AND COMMON PLANT AS OF DECEMBER 31, 2021

DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVIOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)		
							AMOUNT (8)	RATE (9)=(8)/(5)			
<b>HYDRO PRODUCTION PLANT</b>											
330.10	ASSET AGREEMENT - SETTLEMENT LITTLE FALLS	12-2059	50-SQ	0	4,200,000.00	2,107,100	2,092,900	83,394	1.99	25.1	
330.30	REMOVING PROPERTY OF OTHERS LITTLE FALLS	12-2059	100-R4	*	0	13,633.60	10,676	2,958	170	1.25	17.4
	LONG LAKE	12-2055	100-R4	*	0	171,079.55	109,434	61,645	2,296	1.34	26.8
	SPOKANE UPPER FALLS	12-2060	100-R4	*	0	63,563.76	54,920	8,644	541	0.85	16.0
	NINE MILE	12-2060	100-R4	*	0	9,936.75	7,747	2,190	58	0.58	37.8
	POST FALLS	12-2060	100-R4	*	0	23,166.89	16,851	6,316	320	1.38	19.7
	CABINET GORGE	12-2072	100-R4	*	0	6,783,236.89	2,524,159	4,259,077	125,202	1.85	34.0
	NOXON RAPIDS	12-2079	100-R4	*	0	29,413,621.64	9,332,647	20,080,975	512,637	1.74	39.2
	TOTAL ACCOUNT 330.30				36,478,239.08	12,056,434	24,421,805	641,224	1.76		
330.31	TWIN CREEK CHANNEL RESTORATION CABINET GORGE	12-2072	100-R4	*	0	242,033.02	60,609	181,424	3,623	1.50	50.1
330.40	LAND EASEMENTS LITTLE FALLS	12-2059	90-R4	*	0	3,626.67	3,627	0	0	-	-
	LONG LAKE	12-2055	90-R4	*	0	246,562.25	239,896	6,666	298	0.12	22.4
	NINE MILE	12-2060	90-R4	*	0	979.50	980	0	0	-	-
	POST FALLS	12-2060	90-R4	*	0	2,708,437.11	1,684,647	1,023,791	28,210	1.04	36.3
	CABINET GORGE	12-2072	90-R4	*	0	365,924.35	165,075	200,850	7,563	2.07	26.6
	NOXON RAPIDS	12-2079	90-R4	*	0	80,869.91	13,105	67,765	1,251	1.55	54.2
	TOTAL ACCOUNT 330.40				3,406,399.79	2,107,329	1,299,072	37,322	1.10		
330.41	LAND EASEMENTS - CONSERVATION - HABITAT CABINET GORGE	12-2072	90-R4	*	0	1,992,208.04	214,510	1,777,698	35,344	1.77	50.3
	NOXON RAPIDS	12-2079	90-R4	*	0	982,234.97	212,592	769,643	13,865	1.41	55.5
	TOTAL ACCOUNT 330.41				2,974,443.01	427,102	2,547,341	49,209	1.65		
331.00	STRUCTURES AND IMPROVEMENTS MONROE STREET	12-2072	110-R1.5	*	(7)	8,198,986.35	1,831,747	6,941,168	149,638	1.83	46.4
	LITTLE FALLS	12-2059	110-R1.5	*	(5)	5,471,929.54	1,140,980	4,604,546	126,940	2.32	36.3
	LONG LAKE	12-2055	110-R1.5	*	(6)	7,696,252.01	1,466,588	6,680,839	206,700	2.69	32.3
	SPOKANE UPPER FALLS	12-2060	110-R1.5	*	(6)	1,114,579.61	535,115	646,339	17,502	1.57	36.9
	NINE MILE	12-2060	110-R1.5	*	(4)	20,049,059.52	2,189,911	18,661,111	502,464	2.51	37.1
	POST FALLS	12-2060	110-R1.5	*	(4)	6,751,666.16	899,754	6,121,978	164,159	2.43	37.3
	CABINET GORGE	12-2072	110-R1.5	*	(13)	23,434,868.70	5,716,415	20,764,986	446,484	1.91	46.5
	NOXON RAPIDS	12-2079	110-R1.5	*	(21)	21,487,759.85	5,899,734	20,100,455	391,349	1.82	51.4
	TOTAL ACCOUNT 331.00				94,195,101.74	19,680,245	84,521,422	2,005,236	2.13		
331.10	STRUCTURES AND IMPROVEMENTS - FISH AND WILDLIFE CONSERVATION LONG LAKE	12-2055	55-S2.5	*	(6)	66,378.33	64,914	5,447	205	0.31	26.6
	POST FALLS	12-2060	55-S2.5	*	(4)	6,181.09	2,673	3,756	101	1.63	37.2
	CABINET GORGE	12-2072	55-S2.5	*	(13)	31,650.07	11,620	24,144	616	1.95	39.2
	NOXON RAPIDS	12-2079	55-S2.5	*	(21)	1,090,121.07	115,486	1,203,561	26,836	2.46	44.8
	TOTAL ACCOUNT 331.10				1,194,330.56	194,693	1,236,908	27,758	2.32		
331.20	STRUCTURES AND IMPROVEMENTS - RECREATION MONROE STREET	12-2072	50-R2.5	*	(7)	4,037,024.94	660,395	3,659,222	96,265	2.38	38.0
	LONG LAKE	12-2055	50-R2.5	*	(6)	1,720,681.91	398,598	1,425,325	46,217	2.69	30.8
	SPOKANE UPPER FALLS	12-2060	50-R2.5	*	(6)	5,979.70	6,401	(62)	0	-	-
	NINE MILE	12-2060	50-R2.5	*	(4)	370,751.66	84,116	301,466	8,664	2.34	34.8
	POST FALLS	12-2060	50-R2.5	*	(4)	901,178.74	142,194	795,032	23,316	2.59	34.1
	CABINET GORGE	12-2072	50-R2.5	*	(13)	2,354,042.26	493,559	2,166,509	53,840	2.29	40.2
	NOXON RAPIDS	12-2079	50-R2.5	*	(21)	2,332,309.51	502,199	2,319,895	57,343	2.46	40.5
	TOTAL ACCOUNT 331.20				11,721,968.72	2,287,462	10,667,387	285,645	2.44		
331.26	STRUCTURES AND IMPROVEMENTS - RECREATION INFORMATION AND EDUCATION CABINET GORGE	12-2072	50-R3	*	(13)	37,910.91	18,077	24,763	642	1.69	38.6
	NOXON RAPIDS	12-2079	50-R3	*	(21)	13,605.56	6,099	10,364	289	2.12	35.9
	TOTAL ACCOUNT 331.26				51,516.47	24,176	35,127	931	1.81		

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC, GAS AND COMMON PLANT AS OF DECEMBER 31, 2021

DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL (8)		COMPOSITE REMAINING LIFE (10)=(8)/(5)
							AMOUNT	RATE (9)=(8)/(5)	
332.00 RESERVOIRS, DAMS AND WATERWAYS									
MONROE STREET	12-2072	110-R1	*	9,972,019.53	2,029,327	8,640,734	189,652	1.90	45.6
LITTLE FALLS	12-2059	110-R1	*	6,379,552.46	3,299,976	3,398,554	95,345	1.49	35.6
LONG LAKE	12-2055	110-R1	*	37,694,874.97	16,270,701	23,695,866	734,546	1.95	32.2
SPOKANE UPPER FALLS	12-2060	110-R1	*	7,728,573.39	3,199,661	4,992,627	137,477	1.78	36.3
NINE MILE	12-2060	110-R1	*	30,792,771.90	(295,051)	32,319,534	896,452	2.88	36.5
POST FALLS	12-2060	110-R1	*	24,355,870.11	4,596,675	20,733,430	566,650	2.33	36.6
CABINET GORGE	12-2072	110-R1	*	26,840,962.19	10,015,823	20,314,465	459,406	1.71	44.2
NOXON RAPIDS	12-2079	110-R1	*	32,600,317.91	13,096,439	26,349,945	553,701	1.70	47.6
TOTAL ACCOUNT 332.00				176,364,942.46	52,213,550	140,435,155	3,623,229	2.05	
332.10 RESERVOIRS, DAMS AND WATERWAYS - FISH AND WILDLIFE CONSERVATION									
LONG LAKE	12-2055	65-S1.5	*	83,780.62	10,152	78,655	2,420	2.89	32.5
NINE MILE	12-2060	65-S1.5	*	82,457.93	8,943	76,813	2,092	2.54	36.7
POST FALLS	12-2060	65-S1.5	*	1,369,247.82	159,865	1,264,152	34,494	2.52	36.6
CABINET GORGE	12-2072	65-S1.5	*	16,353,511.49	4,458,504	14,020,964	335,597	2.05	41.8
NOXON RAPIDS	12-2079	65-S1.5	*	2,333,225.37	765,480	2,057,722	46,458	1.99	44.3
TOTAL ACCOUNT 332.10				20,222,223.23	5,402,945	17,498,306	421,061	2.08	
332.15 RESERVOIRS, DAMS AND WATERWAYS - FISH AND WILDLIFE CONSERVATION									
NINE MILE	12-2060	65-S1.5	*	11,034.00	1,291	10,184	279	2.53	36.5
CABINET GORGE	12-2072	65-S1.5	*	1,494,661.03	333,197	1,355,770	31,929	2.14	42.5
NOXON RAPIDS	12-2079	65-S1.5	*	956,178.75	326,496	830,480	17,935	1.88	46.3
TOTAL ACCOUNT 332.15				2,461,873.78	660,984	2,196,434	50,143	2.04	
332.20 RESERVOIRS, DAMS AND WATERWAYS - RECREATION									
LITTLE FALLS	12-2059	65-S1.5	*	14,365.60	10,198	4,886	166	1.16	29.4
LONG LAKE	12-2055	65-S1.5	*	105,639.43	102,370	9,608	347	0.33	27.7
NINE MILE	12-2060	65-S1.5	*	47,371.90	613	48,653	1,612	3.40	30.2
POST FALLS	12-2060	65-S1.5	*	338,870.45	39,247	313,179	9,946	2.94	31.5
CABINET GORGE	12-2072	65-S1.5	*	102,570.35	61,556	54,349	1,602	1.66	33.9
NOXON RAPIDS	12-2079	65-S1.5	*	67,068.92	25,675	55,478	1,534	2.29	36.2
TOTAL ACCOUNT 332.20				675,886.85	239,659	486,153	15,207	2.25	
333.00 TURBINES AND GENERATORS									
MONROE STREET	12-2072	70-S0	*	11,574,970.98	2,972,505	9,412,714	247,099	2.13	38.1
LITTLE FALLS	12-2059	70-S0	*	39,200,539.26	7,020,990	34,139,577	997,073	2.54	34.2
LONG LAKE	12-2055	70-S0	*	8,735,798.61	8,604,845	655,101	22,570	0.26	29.0
SPOKANE UPPER FALLS	12-2060	70-S0	*	1,181,041.97	1,209,744	42,161	1,203	0.10	35.0
NINE MILE	12-2060	70-S0	*	41,134,467.99	(2,102,188)	44,882,034	1,302,488	3.17	34.5
POST FALLS	12-2060	70-S0	*	2,233,650.87	2,245,416	77,581	2,417	0.11	32.1
CABINET GORGE	12-2072	70-S0	*	46,869,962.84	9,665,042	43,298,016	1,096,192	2.34	39.5
NOXON RAPIDS	12-2079	70-S0	*	88,822,330.21	23,740,028	83,734,992	1,951,957	2.20	42.9
TOTAL ACCOUNT 333.00				239,752,762.73	53,356,382	216,242,176	5,620,999	2.34	
334.00 ACCESSORY ELECTRIC EQUIPMENT									
MONROE STREET	12-2072	40-S0.5	*	3,034,242.49	226,273	3,020,367	113,418	3.74	26.6
LITTLE FALLS	12-2059	40-S0.5	*	13,963,868.82	2,732,501	11,929,561	417,552	2.99	28.6
LONG LAKE	12-2055	40-S0.5	*	4,504,041.49	2,817,339	1,956,945	71,987	1.60	27.2
SPOKANE UPPER FALLS	12-2060	40-S0.5	*	4,298,798.09	1,218,411	3,338,315	127,947	2.98	26.1
NINE MILE	12-2060	40-S0.5	*	18,580,449.17	1,839,520	17,454,147	614,603	3.31	28.4
POST FALLS	12-2060	40-S0.5	*	2,448,273.68	776,477	1,769,728	61,723	2.52	28.7
CABINET GORGE	12-2072	40-S0.5	*	17,382,299.74	4,054,954	15,587,045	471,285	2.71	33.1
NOXON RAPIDS	12-2079	40-S0.5	*	19,615,761.09	3,497,046	20,238,025	696,979	3.55	29.0
TOTAL ACCOUNT 334.00				83,827,734.56	17,162,521	75,324,133	2,575,494	3.07	
335.00 MISCELLANEOUS POWER PLANT EQUIPMENT									
MONROE STREET	12-2072	65-R1	*	33,563.70	7,685	28,228	726	2.16	38.9
LITTLE FALLS	12-2059	65-R1	*	548,948.45	133,983	442,413	13,202	2.40	33.5
LONG LAKE	12-2055	65-R1	*	811,545.53	321,442	538,796	17,878	2.20	30.1
SPOKANE UPPER FALLS	12-2060	65-R1	*	104,449.82	42,781	67,936	2,117	2.03	32.1
NINE MILE	12-2060	65-R1	*	1,022,150.57	72,764	990,272	29,267	2.86	33.8
POST FALLS	12-2060	65-R1	*	809,339.90	139,759	701,955	20,541	2.54	34.2
CABINET GORGE	12-2072	65-R1	*	5,320,035.05	2,441,410	3,570,229	84,871	1.60	42.1
NOXON RAPIDS	12-2079	65-R1	*	3,353,312.33	1,562,384	2,495,124	58,811	1.75	42.4
TOTAL ACCOUNT 335.00				12,003,345.35	4,722,209	8,834,953	227,413	1.89	

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DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL (8)		COMPOSITE REMAINING LIFE (10)=(7)/(8)	
							AMOUNT	RATE (9)=(8)/(5)		
335.10 MISCELLANEOUS POWER PLANT EQUIPMENT - FISH AND WILDLIFE CONSERVATION										
CABINET GORGE	12-2072	55-R3	*	(13)	117,435.81	78,870	53,833	1,409	1.20	38.2
NOXON RAPIDS	12-2079	55-R3	*	(21)	355,980.02	286,047	144,689	4,141	1.16	34.9
TOTAL ACCOUNT 335.10				473,415.83	364,916	198,522	5,550	1.17		
335.15 MISCELLANEOUS POWER PLANT EQUIPMENT - FISH AND WILDLIFE CONSERVATION										
LONG LAKE	12-2055	55-R3	*	(6)	14,592.13	472	14,996	456	3.12	32.9
POST FALLS	12-2060	55-R3	*	(4)	16,925.06	330	17,272	464	2.74	37.2
CABINET GORGE	12-2072	55-R3	*	(13)	246,707.66	12,982	265,798	5,852	2.37	45.4
NOXON RAPIDS	12-2079	55-R3	*	(21)	578,629.85	23,277	676,865	14,230	2.46	47.6
TOTAL ACCOUNT 335.15				856,854.70	37,061	974,931	21,002	2.45		
335.20 MISCELLANEOUS POWER PLANT EQUIPMENT - RECREATION										
LONG LAKE	12-2055	55-R3	*	(6)	25,697.14	223	27,016	818	3.18	33.0
NINE MILE	12-2060	55-R3	*	(4)	18,741.21	956	18,535	514	2.74	36.1
CABINET GORGE	12-2072	55-R3	*	(13)	49,308.33	24,533	31,185	711	1.44	43.9
NOXON RAPIDS	12-2079	55-R3	*	(21)	45,388.32	7,091	47,829	1,082	2.38	44.2
TOTAL ACCOUNT 335.20				139,135.00	32,802	124,565	3,125	2.25		
336.00 ROADS, RAILROADS AND BRIDGES										
MONROE STREET	12-2072	60-S2.5	*	(7)	50,448.44	14,745	39,235	1,268	2.51	30.9
SPOKANE UPPER FALLS	12-2060	60-S2.5	*	(6)	508,242.34	74,751	463,986	12,622	2.48	36.8
NINE MILE	12-2060	60-S2.5	*	(4)	594,870.06	207,948	410,717	13,969	2.35	29.4
POST FALLS	12-2060	60-S2.5	*	(4)	577,943.72	53,322	547,739	14,583	2.52	37.6
CABINET GORGE	12-2072	60-S2.5	*	(13)	1,671,012.58	1,128,034	760,210	21,248	1.27	35.8
NOXON RAPIDS	12-2079	60-S2.5	*	(21)	259,749.63	140,057	174,240	5,835	2.25	29.9
TOTAL ACCOUNT 336.00				3,662,266.77	1,618,856	2,396,127	69,525	1.90		
<b>TOTAL HYDRO PRODUCTION PLANT</b>				<b>694,904,473.45</b>	<b>174,757,033</b>	<b>591,714,841</b>	<b>15,767,090</b>	<b>2.27</b>		
<b>OTHER PRODUCTION PLANT</b>										
341.00 STRUCTURES AND IMPROVEMENTS										
KETTLE FALLS	12-2038	55-R4	*	(1)	9,028.80	3,289	5,830	344	3.81	16.9
NORTHEAST TURBINE	12-2035	55-R4	*	(7)	751,025.35	779,112	24,485	1,755	0.23	14.0
BOULDER PARK	12-2042	55-R4	*	(1)	1,273,891.95	598,553	688,078	33,476	2.63	20.6
RATHDRUM TURBINE	12-2034	55-R4	*	(4)	3,584,501.93	1,913,632	1,814,250	140,604	3.92	12.9
COYOTE SPRINGS 2	12-2043	55-R4	*	(3)	11,757,925.21	5,786,408	6,324,255	295,913	2.52	21.4
TOTAL ACCOUNT 341.00				17,376,373.24	9,080,994	8,856,898	472,092	2.72		
342.00 FUEL HOLDERS, PRODUCERS AND ACCESSORIES										
KETTLE FALLS	12-2038	55-R3	*	(1)	89,232.19	70,508	19,617	1,203	1.35	16.3
NORTHEAST TURBINE	12-2035	55-R3	*	(7)	36,896.84	36,512	2,967	213	0.58	13.9
BOULDER PARK	12-2042	55-R3	*	(1)	162,143.44	16,093	147,672	7,159	4.42	20.6
RATHDRUM TURBINE	12-2034	55-R3	*	(4)	1,695,808.40	1,003,620	760,021	59,745	3.52	12.7
LANCASTER	12-2040	55-R3	*	(3)	91,977.92	45,642	49,095	2,649	2.88	18.5
COYOTE SPRINGS 2	12-2043	55-R3	*	(3)	19,000,289.10	10,222,924	9,347,373	448,888	2.36	20.8
TOTAL ACCOUNT 342.00				21,076,347.89	11,395,299	10,326,745	519,857	2.47		
343.00 PRIME MOVERS										
KETTLE FALLS	12-2038	60-S2	*	(1)	8,670,084.38	6,454,410	2,302,376	140,904	1.63	16.3
NORTHEAST TURBINE	12-2035	60-S2	*	(7)	9,058,274.22	9,314,957	377,397	27,757	0.31	13.6
BOULDER PARK	12-2042	60-S2	*	(1)	57,216.28	30,851	26,937	1,342	2.35	20.1
RATHDRUM TURBINE	12-2034	60-S2	*	(4)	3,658,328.03	2,999,013	805,648	63,599	1.74	12.7
TOTAL ACCOUNT 343.00				21,443,902.91	18,799,230	3,512,358	233,602	1.09		
344.00 GENERATORS										
KETTLE FALLS	12-2038	50-R1	*	(1)	234,260.93	59,467	177,136	11,036	4.71	16.1
NORTHEAST TURBINE	12-2035	50-R1	*	(7)	2,856,667.42	2,692,182	364,453	27,540	0.96	13.2
BOULDER PARK	12-2042	50-R1	*	(1)	31,370,459.06	18,485,718	13,198,446	704,436	2.25	18.7
RATHDRUM TURBINE	12-2034	50-R1	*	(4)	51,202,472.43	29,047,819	24,202,753	1,975,711	3.86	12.3
LANCASTER	12-2040	50-R1	*	(3)	208,505.82	98,908	115,853	6,620	3.17	17.5
COYOTE SPRINGS 2	12-2043	50-R1	*	(3)	153,915,854.36	54,699,583	103,833,747	5,227,712	3.40	19.9
TOTAL ACCOUNT 344.00				239,788,220.02	105,083,676	141,892,388	7,953,055	3.32		

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	DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL (8)		COMPOSITE REMAINING LIFE (10)=(7)/(8)	
								AMOUNT	RATE (9)=(8)/(5)		
344.01	GENERATORS - SOLAR CENTRAL OPERATIONS FACILITY BOULDER PARK	12-2029 12-2042	25-S2.5 25-S2.5	* *	(3) (1)	449,172.23 22,481.62	216,225 1,845	246,423 20,861	31,915 1,200	7.11 5.34	7.7 17.4
	TOTAL ACCOUNT 344.01				471,653.85	218,070	267,284	33,115	7.02		
345.00	ACCESSORY ELECTRIC EQUIPMENT KETTLE FALLS NORTHEAST TURBINE BOULDER PARK RATHDRUM TURBINE LANCASTER COYOTE SPRINGS 2	12-2038 12-2035 12-2042 12-2034 12-2040 12-2043	30-S0.5 30-S0.5 30-S0.5 30-S0.5 30-S0.5 30-S0.5	* * * * * *	(1) (7) (1) (4) (3) (3)	538,522.64 1,243,060.53 924,803.36 4,808,069.65 308,080.38 17,886,372.01	12,753 1,316,097 227,080 1,251,402 22,741 11,301,510	531,155 13,978 706,971 3,748,990 294,581 7,121,453	33,547 1,134 40,640 317,971 17,099 439,978	6.23 0.09 4.39 6.61 5.55 2.46	15.8 12.3 17.4 11.8 17.2 16.2
	TOTAL ACCOUNT 345.00				25,708,908.57	14,131,584	12,417,128	850,369	3.31		
345.01	ACCESSORY ELECTRIC EQUIPMENT - SOLAR CENTRAL OPERATIONS FACILITY	12-2029	25-S2.5	*	(3)	33,209.41	11,701	22,505	2,961	8.92	7.6
346.00	MISCELLANEOUS POWER PLANT EQUIPMENT NORTHEAST TURBINE BOULDER PARK RATHDRUM TURBINE COYOTE SPRINGS 2	12-2035 12-2042 12-2034 12-2043	35-R2 35-R2 35-R2 35-R2	* * * *	(7) (1) (4) (3)	398,997.44 64,652.42 249,472.21 935,172.62	416,493 8,668 75,249 240,666	10,434 56,631 184,202 722,562	799 2,924 14,867 41,025	0.20 4.52 5.96 4.39	13.1 19.4 12.4 17.6
	TOTAL ACCOUNT 346.00				1,648,294.69	741,077	973,829	59,615	3.62		
	<b>TOTAL OTHER PRODUCTION PLANT</b>				<b>327,546,910.58</b>	<b>159,461,630</b>	<b>178,269,135</b>	<b>10,124,666</b>	<b>3.09</b>		
	<b>TRANSMISSION PLANT</b>										
350.30	REMOVING PROPERTY OF OTHERS		80-R4		0	1,487,565.91	808,526	679,040	15,519	1.04	43.8
350.40	LAND RIGHTS		80-R4		0	21,370,166.35	6,109,257	15,260,909	252,654	1.18	60.4
352.00	STRUCTURES AND IMPROVEMENTS		65-S2	(15)		30,958,188.58	7,747,582	27,854,334	545,668	1.76	51.0
353.00	STATION EQUIPMENT		46-R2	(10)		354,761,236.38	95,101,385	295,135,975	8,298,195	2.34	35.6
354.00	TOWERS AND FIXTURES		80-R4	(10)		17,278,383.79	10,901,411	8,104,811	189,191	1.09	42.8
355.00	POLES AND FIXTURES		60-R2.5	(40)		333,668,354.17	77,105,789	390,029,907	8,017,633	2.40	48.6
356.00	OVERHEAD CONDUCTORS AND DEVICES		60-R3	(30)		175,262,336.99	51,880,548	175,960,490	4,425,996	2.53	39.8
357.00	UNDERGROUND CONDUIT		60-R4	0		3,524,684.97	924,722	2,599,963	57,388	1.63	45.3
358.00	UNDERGROUND CONDUCTORS AND DEVICES		50-S3	0		7,295,386.96	881,892	6,413,495	152,088	2.08	42.2
359.00	ROADS AND TRAILS		75-R4	0		2,576,201.29	993,569	1,582,632	31,723	1.23	49.9
	<b>TOTAL TRANSMISSION PLANT</b>					<b>948,182,505.39</b>	<b>252,454,682</b>	<b>923,621,556</b>	<b>21,986,055</b>	<b>2.32</b>	
	<b>DISTRIBUTION PLANT</b>										
360.40	LAND - EASEMENTS		75-R4		0	3,919,239.32	387,325	3,531,915	52,468	1.34	67.3
361.00	STRUCTURES AND IMPROVEMENTS		63-S1	(15)		28,833,810.29	8,187,808	24,971,074	497,230	1.72	50.2
362.00	STATION EQUIPMENT		43-R1.5	(10)		162,535,477.01	46,837,456	131,951,569	4,194,733	2.58	31.5
364.00	POLES, TOWERS AND FIXTURES		63-R3	(60)		497,678,991.49	138,251,042	658,035,344	13,408,462	2.69	49.1
365.00	OVERHEAD CONDUCTORS AND DEVICES		65-R3	(55)		319,701,302.67	101,368,487	394,168,533	7,856,503	2.46	50.2
366.00	UNDERGROUND CONDUIT		65-S2.5	(25)		144,282,581.99	44,284,515	136,068,713	2,626,090	1.82	51.8
367.00	UNDERGROUND CONDUCTORS AND DEVICES		40-S1.5	(25)		252,143,399.05	127,247,806	187,931,443	6,132,115	2.43	30.6
368.00	LINE TRANSFORMERS		50-R2.5	(10)		308,080,442.02	109,826,359	229,062,127	6,242,843	2.03	36.7
	<b>SERVICES</b>										
369.10	OVERHEAD		70-R4	(35)		66,511,466.03	33,730,790	56,059,690	1,103,488	1.66	50.8
369.20	UNDERGROUND - SPOKANE NETWORK		70-R4	(35)		8,600,892.21	1,660,864	9,950,340	160,900	1.87	61.8
369.30	UNDERGROUND - OTHER		70-R4	(35)		126,203,635.53	47,338,457	123,036,451	2,217,626	1.76	55.5
	TOTAL SERVICES					201,315,993.77	82,730,111	189,046,481	3,482,014	1.73	
	<b>METERS</b>										
370.10	IDAHO	12-2028	33-L1.5	(2)		24,506,399.42	16,172,372	8,824,155	1,364,365	5.57	6.5
370.30	WASHINGTON STANDARD		12-L2.5	(2)		1,027,480.24	296,841	751,189	80,758	7.86	9.3
370.40	WASHINGTON AMI		15-S2.5	(2)		59,447,402.71	8,551,329	52,085,022	4,478,602	7.53	11.6
	TOTAL METERS					84,981,282.37	25,020,541	61,660,366	5,923,725	6.97	
371.00	INSTALLATIONS ON CUSTOMERS' PREMISES - CATALYST BUILDING		35-R3		0	604,986.51	23,632	581,354	17,318	2.86	33.6
	<b>ELECTRIC VEHICLE CHARGING STATION</b>										
371.01	RESIDENTIAL		10-S3	0		2,572,461.22	717,097	1,855,364	279,501	10.87	6.6
371.02	MULTI-UNIT DWELLINGS		10-S3	0		165,896.47	106,800	59,097	12,655	7.63	4.7
	TOTAL ELECTRIC VEHICLE CHARGING STATION					2,738,357.69	823,897	1,914,461	292,156	10.67	



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DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL (8)		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT	RATE (9)=(8)/(5)	
STREET LIGHTING AND SIGNAL SYSTEMS									
373.10	MERCURY VAPOR	33-S1	(15)	4,542,176.93	4,650,479	573,024	35,580	0.78	16.1
373.20	UNDERGROUND CONDUCTOR	33-S1	(15)	5,767,344.92	2,775,261	3,857,186	155,806	2.70	24.8
373.30	DECORATIVE AND METAL STANDARDS	33-S1	(15)	17,164,120.57	6,550,001	13,188,737	531,748	3.10	24.8
373.40	HIGH PRESSURE SODIUM VAPOR	33-S1	(15)	29,524,179.83	6,331,375	27,621,432	1,106,794	3.75	25.0
373.50	LED	33-S1	(15)	17,970,693.09	3,792,058	16,874,239	586,057	3.26	28.8
TOTAL STREET LIGHTING AND SIGNAL SYSTEMS				74,968,515.44	24,099,174	62,114,618	2,415,985	3.22	
<b>TOTAL DISTRIBUTION PLANT</b>				<b>2,081,784,379.62</b>	<b>709,088,152</b>	<b>2,081,037,998</b>	<b>53,141,642</b>	<b>2.55</b>	
<b>GENERAL PLANT</b>									
390.10	STRUCTURES AND IMPROVEMENTS - COMPANY	50-S1	(5)	17,871,784.76	2,401,202	16,364,172	368,082	2.06	44.5
OFFICE FURNITURE AND EQUIPMENT									
391.00	FURNITURE AND EQUIPMENT	15-SQ	0	33,038.66	2,141	30,898	2,203	6.67	14.0
391.10	COMPUTER HARDWARE	5-SQ	0	1,636,374.28	613,250	1,023,124	327,303	20.00	3.1
391.12	COMPUTER HARDWARE - AMI	5-SQ	0	326,249.47	163,115	163,134	65,254	20.00	2.5
TOTAL OFFICE FURNITURE AND EQUIPMENT				1,995,662.41	778,506	1,217,156	394,760	19.78	
TRANSPORTATION EQUIPMENT									
392.20	LIGHT TRUCKS	14-L2.5	10	8,069,708.69	4,208,989	3,053,749	336,680	4.17	9.1
392.30	MEDIUM TRUCKS	17-L2.5	10	25,968,428.69	11,001,930	12,369,656	990,508	3.81	12.5
392.40	HEAVY TRUCKS	20-R4	10	12,764,812.10	4,325,582	7,162,749	503,016	3.94	14.2
392.50	OTHER	16-L2	10	8,290,921.49	3,317,405	4,144,424	392,099	4.73	10.6
TOTAL TRANSPORTATION EQUIPMENT				55,093,870.97	22,853,905	26,730,578	2,222,303	4.03	
393.00	STORES EQUIPMENT	25-SQ	0	472,783.36	203,758	269,025	18,912	4.00	14.2
TOOLS, SHOP AND GARAGE EQUIPMENT									
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	20-SQ	0	7,396,275.89	2,134,054	5,262,222	369,582	5.00	14.2
394.10	ELECTRIC VEHICLE CHARGER	10-S2.5	0	117,230.09	61,134	56,096	11,147	9.51	5.0
TOTAL TOOLS, SHOP AND GARAGE EQUIPMENT				7,513,505.98	2,195,188	5,318,318	380,729	5.07	
LABORATORY EQUIPMENT									
395.00	LABORATORY EQUIPMENT	15-SQ	0	2,901,500.20	485,994	2,415,506	193,434	6.67	12.5
395.12	LABORATORY EQUIPMENT - AMI	15-SQ	0	253,883.45	58,519	195,364	16,935	6.67	11.5
TOTAL LABORATORY EQUIPMENT				3,155,383.65	544,513	2,610,870	210,369	6.67	
POWER OPERATED EQUIPMENT									
396.30	MEDIUM TRUCKS	16-L2	0	4,329,903.21	3,171,982	1,157,921	158,345	3.66	7.3
396.40	HEAVY TRUCKS	24-S1	0	21,869,320.06	16,077,964	5,791,356	411,472	1.88	14.1
396.50	OTHER	16-S0	0	4,057,267.11	1,894,977	2,162,290	196,355	4.84	11.0
TOTAL POWER OPERATED EQUIPMENT				30,256,490.38	21,144,923	9,111,567	766,172	2.53	
COMMUNICATION EQUIPMENT									
397.00	COMMUNICATION EQUIPMENT	15-SQ	0	46,103,096.93	24,744,035	21,359,062	3,075,067	6.67	6.9
397.50	SUB INTEGRATION	15-SQ	0	3,537,825.37	655,984	2,881,841	235,914	6.67	12.2
397.60	DISTRIBUTION	15-SQ	0	563,964.48	41,387	522,577	37,616	6.67	13.9
TOTAL COMMUNICATION EQUIPMENT				50,204,886.78	25,441,406	24,763,480	3,348,597	6.67	
398.00	MISCELLANEOUS EQUIPMENT	10-SQ	0	288,548.57	135,498	153,051	28,842	10.00	5.3
<b>TOTAL GENERAL PLANT</b>				<b>166,852,916.86</b>	<b>75,698,901</b>	<b>86,538,217</b>	<b>7,738,766</b>	<b>4.64</b>	
<b>TOTAL DEPRECIABLE ELECTRIC PLANT</b>				<b>4,664,358,358.02</b>	<b>1,719,493,940</b>	<b>3,975,029,309</b>	<b>127,953,839</b>	<b>2.74</b>	

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC, GAS AND COMMON PLANT AS OF DECEMBER 31, 2021

DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT (8)	RATE (9)=(8)/(5)	
<b>GAS PLANT - WASHINGTON AND IDAHO</b>									
<b>NATURAL GAS STORAGE AND PROCESSING PLANT</b>									
350.20	RIGHTS OF WAY	65-R4	0	66,073.04	30,538	35,535	798	1.21	44.5
	STRUCTURES AND IMPROVEMENTS								
351.10	STRUCTURES AND IMPROVEMENTS	55-R2.5	(5)	1,934,672.05	617,856	1,413,550	31,045	1.60	45.5
351.20	COMPRESSOR STATION	55-R2.5	(5)	275,254.53	211,229	77,799	3,234	1.17	24.1
351.30	MEASURING AND REGULATING STATION	55-R2.5	(5)	52,850.07	41,396	14,096	586	1.11	24.1
351.40	OFFICE	55-R2.5	(5)	171,892.07	113,487	67,000	2,276	1.32	29.4
	TOTAL STRUCTURES AND IMPROVEMENTS			2,434,668.72	983,968	1,572,435	37,141	1.53	
	WELLS								
352.00	STORAGE WELLS	60-R4	0	17,514,187.79	6,392,534	11,121,654	257,465	1.47	43.2
352.20	RESERVOIRS	50-R4	0	203,330.47	100,040	103,290	3,858	1.90	26.8
352.30	NON-RECOVERABLE GAS	50-R4	0	5,359,690.41	3,880,450	1,479,240	45,788	0.85	32.3
	TOTAL WELLS			23,077,208.67	10,373,024	12,704,184	307,111	1.33	
353.00	LINES	65-R4	0	2,059,776.77	658,349	1,401,428	30,912	1.50	45.3
354.00	COMPRESSOR STATION EQUIPMENT	55-R4	0	14,950,425.57	4,095,122	10,855,304	265,347	1.77	40.9
355.00	MEASURING AND REGULATING EQUIPMENT	35-R3	0	1,559,281.17	900,020	659,261	19,345	1.24	34.1
356.00	PURIFICATION EQUIPMENT	35-S2.5	0	545,142.76	404,807	140,336	8,583	1.58	16.3
357.00	OTHER EQUIPMENT	45-R2	0	2,572,899.06	1,040,300	1,532,599	44,316	1.72	34.6
	<b>TOTAL NATURAL GAS STORAGE AND PROCESSING PLANT</b>			<b>47,265,475.76</b>	<b>18,486,129</b>	<b>28,901,082</b>	<b>713,563</b>	<b>1.51</b>	
<b>DISTRIBUTION PLANT</b>									
374.40	LAND - EASEMENTS	60-R4	0	668,024.19	55,211	612,813	11,343	1.70	54.0
375.00	STRUCTURES AND IMPROVEMENTS	45-R2	0	1,575,588.81	291,324	1,284,265	37,193	2.36	34.5
376.00	MAINS	55-R3	(20)	437,133,268.15	130,648,846	393,911,076	9,190,399	2.10	42.9
378.00	MEASURING AND REGULATING EQUIPMENT - GENERAL	32-R2	(15)	7,132,736.23	2,326,349	5,876,298	287,503	4.03	20.4
379.00	MEASURING AND REGULATING EQUIPMENT - CITY GATE	37-S0.5	(15)	6,602,678.34	2,162,723	5,430,357	208,581	3.16	26.0
380.00	SERVICES	52-R3	(25)	321,283,115.49	111,465,916	290,137,978	7,115,867	2.21	40.8
381.00	METERS								
	IDAHO	35-R1	(3)	31,937,722.14	10,715,075	22,180,779	881,397	2.76	25.2
	WASHINGTON	35-R1	(3)	52,741,984.87	10,165,030	44,159,214	1,636,498	3.10	27.0
	WASHINGTON AMI	15-S2.5	(3)	26,583,363.26	3,768,633	23,612,231	1,986,240	7.47	11.9
	TOTAL METERS			111,263,070.27	24,648,738	89,952,224	4,504,135	4.05	
385.00	INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT	65-R2.5	(15)	4,095,769.59	1,637,452	3,072,683	59,548	1.45	51.6
	<b>TOTAL DISTRIBUTION PLANT</b>			<b>889,754,251.07</b>	<b>273,236,558</b>	<b>790,277,694</b>	<b>21,414,569</b>	<b>2.41</b>	
<b>GENERAL PLANT</b>									
389.42	LAND EASEMENTS	50-R3	0	2,368.16	153	2,215	48	2.03	46.1
390.10	STRUCTURES AND IMPROVEMENTS - COMPANY	30-R3	(5)	25,396,990.63	3,026,959	23,639,881	899,941	3.54	26.3
391.10	OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE	5-SQ	0	143,319.84	68,080	75,240	28,668	20.00	2.6
	TRANSPORTATION EQUIPMENT								
392.20	LIGHT TRUCKS	14-L2.5	10	6,096,666.67	3,906,438	1,580,562	141,994	2.33	11.1
392.30	MEDIUM TRUCKS	17-L2.5	10	4,873,010.27	3,042,040	1,343,669	99,522	2.04	13.5
392.40	HEAVY TRUCKS	20-R4	10	3,098,038.40	1,477,241	1,310,993	86,722	2.80	15.1
392.50	OTHER	16-L2	10	1,680,103.22	764,833	747,260	68,600	4.08	10.9
	TOTAL TRANSPORTATION EQUIPMENT			15,747,818.56	9,190,553	4,982,484	396,838	2.52	
393.00	STORES EQUIPMENT	25-SQ	0	222,353.15	43,386	178,967	8,895	4.00	20.1
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	20-SQ	0	3,414,564.99	1,408,340	2,006,225	170,613	5.00	11.8
395.00	LABORATORY EQUIPMENT	15-SQ	0	160,329.45	60,441	99,889	10,690	6.67	9.3
395.12	LABORATORY EQUIPMENT - AMI	15-SQ	0	40,840.58	9,510	31,331	2,724	6.67	11.5
	POWER OPERATED EQUIPMENT								
396.40	HEAVY TRUCKS	24-S1	0	2,250,127.78	2,078,213	171,915	11,584	0.51	14.8
396.50	OTHER	16-S0	0	1,979,057.51	1,321,527	657,531	57,753	2.92	11.4
	TOTAL POWER OPERATED EQUIPMENT			4,229,185.29	3,399,739	829,446	69,337	1.64	

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DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL (8)		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT	RATE (9)=(8)/(5)	
397.00 COMMUNICATION EQUIPMENT FULLY ACCRUED AMORTIZED		FULLY ACCRUED 15-SQ	0	29.12 884,115.45	29 400,850	0 483,265	0 59,001	- 6.67	- 8.2
TOTAL COMMUNICATION EQUIPMENT				884,144.57	400,879	483,265	59,001	6.67	
397.12 COMMUNICATION EQUIPMENT - AMI		15-SQ	0	19,942.47	4,649	15,293	1,330	6.67	11.5
<b>TOTAL GENERAL PLANT</b>				<b>50,261,857.69</b>	<b>17,612,689</b>	<b>32,344,236</b>	<b>1,648,085</b>	<b>6.67</b>	<b>3.28</b>
<b>TOTAL GAS PLANT - WASHINGTON AND IDAHO</b>				<b>987,281,584.52</b>	<b>309,335,376</b>	<b>851,523,012</b>	<b>23,776,217</b>	<b>2.41</b>	
<b>GAS PLANT - ALLOCATED ALL</b>									
391.10 OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE		5-SQ	0	333,341.25	195,625	137,716	66,655	20.00	2.1
TRANSPORTATION EQUIPMENT									
392.20 LIGHT TRUCKS		14-L2.5	10	50,237.38	5,687	39,527	3,160	6.29	12.5
392.50 OTHER		16-L2	10	46,950.20	6,893	35,362	2,798	5.96	12.6
TOTAL TRANSPORTATION EQUIPMENT				97,187.58	12,580	74,889	5,958	6.13	
394.00 TOOLS, SHOP AND GARAGE EQUIPMENT		20-SQ	0	5,671,193.25	1,743,687	3,927,506	283,456	5.00	13.9
395.00 LABORATORY EQUIPMENT		15-SQ	0	233,215.60	106,892	126,324	15,546	6.67	8.1
397.00 COMMUNICATION EQUIPMENT		15-SQ	0	282,919.85	123,150	159,770	18,869	6.67	8.5
<b>TOTAL GAS PLANT - ALLOCATED ALL</b>				<b>6,617,857.53</b>	<b>2,181,934</b>	<b>4,426,205</b>	<b>390,484</b>	<b>5.90</b>	
<b>GAS PLANT - OREGON</b>									
<b>NATURAL GAS STORAGE AND PROCESSING PLANT</b>									
350.20 RIGHTS OF WAY		65-R4	0	668.75	24	645	12	1.79	53.8
STRUCTURES AND IMPROVEMENTS									
351.10 STRUCTURES AND IMPROVEMENTS		55-R2.5	(5)	24,172.36	740	24,641	534	2.21	46.1
351.20 COMPRESSOR STATION		55-R2.5	(5)	264.37	60	218	5	1.89	43.6
351.40 OFFICE		55-R2.5	(5)	109,010.23	14,174	100,286	1,892	1.74	53.0
TOTAL STRUCTURES AND IMPROVEMENTS				133,446.96	14,974	125,145	2,431	1.82	
WELLS									
352.00 STORAGE WELLS		65-R2.5	0	1,429,957.69	225,365	1,204,593	22,140	1.55	54.4
352.20 RESERVOIRS		50-R4	0	1,464,161.54	289,164	1,174,998	29,786	2.03	39.4
352.30 NON-RECOVERABLE GAS		50-R4	0	450,620.15	119,553	331,067	8,806	1.95	37.6
TOTAL WELLS				3,344,739.38	634,081	2,710,658	60,732	1.82	
353.00 LINES		65-R4	0	170,744.96	20,080	150,665	2,787	1.63	54.1
354.00 COMPRESSOR STATION EQUIPMENT		55-R2	0	3,235,659.23	737,036	2,498,624	56,962	1.76	43.9
355.00 MEASURING AND REGULATING EQUIPMENT		35-R3	0	151,373.35	95,213	56,160	1,643	1.09	34.2
356.00 PURIFICATION EQUIPMENT		35-S2.5	0	15,105.70	543	14,562	569	3.77	25.6
357.00 OTHER EQUIPMENT		45-R2	0	128,959.60	15,368	113,592	2,696	2.09	42.1
<b>TOTAL NATURAL GAS STORAGE AND PROCESSING PLANT</b>				<b>7,180,697.93</b>	<b>1,517,319</b>	<b>5,670,051</b>	<b>127,832</b>	<b>1.78</b>	
<b>DISTRIBUTION PLANT</b>									
374.40 LAND - EASEMENTS		60-R4	0	609,830.41	74,603	535,228	10,174	1.67	52.6
375.00 STRUCTURES AND IMPROVEMENTS		45-R2	0	671,976.30	97,332	574,644	17,232	2.56	33.3
376.00 MAINS		57-R3	(17)	269,917,387.93	78,205,577	237,597,767	5,223,452	1.94	45.5
378.00 MEASURING AND REGULATING EQUIPMENT - GENERAL		32-R2	(15)	6,117,036.85	1,525,043	5,509,549	245,758	4.02	22.4
379.00 MEASURING AND REGULATING EQUIPMENT - CITY GATE		37-S0.5	(15)	3,349,996.01	608,442	3,244,054	107,754	3.22	30.1
380.00 SERVICES		54-R3	(23)	130,250,005.03	47,528,304	112,679,202	2,593,132	1.99	43.5
381.00 METERS		35-R1	(3)	55,834,070.65	9,053,002	48,456,091	1,864,518	3.34	26.0
385.00 INDUSTRIAL MEASURING AND REGULATING STATION EQUIPMENT		65-R2.5	(15)	2,476,547.94	871,753	1,976,277	35,678	1.44	55.4
387.00 OTHER EQUIPMENT		18-SQ	0	539.29	539	0	0	-	-
<b>TOTAL DISTRIBUTION PLANT</b>				<b>469,227,390.41</b>	<b>137,964,595</b>	<b>410,572,812</b>	<b>10,097,698</b>	<b>2.15</b>	

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TABLE 1. SUMMARY OF ESTIMATED SURVIVOR CURVE, NET SALVAGE PERCENT, ORIGINAL COST, BOOK DEPRECIATION RESERVE AND CALCULATED ANNUAL DEPRECIATION ACCRUALS RELATED TO ELECTRIC, GAS AND COMMON PLANT AS OF DECEMBER 31, 2021

DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL (8)		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT	RATE (9)=(8)/(5)	
<b>GENERAL PLANT</b>									
390.10	STRUCTURES AND IMPROVEMENTS - COMPANY			4,111,073.85	1,937,601	2,379,026	138,479	3.37	17.2
391.10	OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE	30-R3 5-SQ	(5) 0	12,222.51	6,111	6,112	2,445	20.00	2.5
TRANSPORTATION EQUIPMENT									
392.20	LIGHT TRUCKS	14-L2.5	10	3,285,771.20	1,271,000	1,686,194	180,854	5.50	9.3
392.30	MEDIUM TRUCKS	17-L2.5	10	1,181,335.73	642,544	420,659	34,201	2.90	12.3
392.50	OTHER	16-L2	10	230,653.00	41,739	165,849	13,500	5.85	12.3
	TOTAL TRANSPORTATION EQUIPMENT			4,697,759.93	1,955,283	2,272,702	228,555	4.87	
393.00	STORES EQUIPMENT	25-SQ	0	20,791.82	17,010	3,782	831	4.00	4.6
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	20-SQ	0	962,772.04	512,505	450,267	48,105	5.00	9.4
395.00	LABORATORY EQUIPMENT	15-SQ	0	18,586.31	3,104	15,483	1,239	6.67	12.5
396.50	POWER OPERATED EQUIPMENT - OTHER	16-S0	0	43,833.95	44,378	(544)	0	-	-
397.00	COMMUNICATION EQUIPMENT	15-SQ	0	766,396.89	417,995	348,402	51,090	6.67	6.8
398.00	MISCELLANEOUS EQUIPMENT								
	FULLY ACCRUED			2,367.16	2,367	0	0	-	-
	AMORTIZED	10-SQ	0	6,732.60	338	6,395	673	10.00	9.5
	TOTAL MISCELLANEOUS EQUIPMENT			9,099.76	2,705	6,395	673	7.40	
<b>TOTAL GENERAL PLANT</b>				<b>10,642,537.06</b>	<b>4,896,692</b>	<b>5,481,625</b>	<b>471,417</b>	<b>4.43</b>	
<b>TOTAL GAS PLANT - OREGON</b>				<b>487,050,625.40</b>	<b>144,378,605</b>	<b>421,724,488</b>	<b>10,696,947</b>	<b>2.20</b>	
<b>TOTAL DEPRECIABLE GAS PLANT</b>				<b>1,480,950,067.45</b>	<b>455,895,915</b>	<b>1,277,673,705</b>	<b>34,863,648</b>	<b>2.35</b>	
<b>COMMON PLANT</b>									
LAND AND LAND RIGHTS									
389.30	REMOVING PROPERTY OF OTHERS	65-R4	0	3,623,332.00	269,423	3,353,909	60,342	1.67	55.6
389.40	LAND EASEMENTS	65-R4	0	139,115.16	38,188	100,928	1,752	1.26	57.6
	TOTAL LAND AND LAND RIGHTS			3,762,447.16	307,610	3,454,837	62,094	1.65	
390.10	STRUCTURES AND IMPROVEMENTS - COMPANY	50-R2	(10)	159,324,485.81	14,881,363	160,375,571	3,907,317	2.45	41.0
391.00	OFFICE FURNITURE AND EQUIPMENT								
	OFFICE FURNITURE AND EQUIPMENT	15-SQ	0	18,575,154.04	8,200,041	10,375,113	1,238,375	6.67	8.4
391.10	COMPUTER HARDWARE								
	FULLY ACCRUED			491,370.77	491,371	0	0	-	-
	AMORTIZED	5-SQ	0	60,938,463.23	31,980,000	28,958,463	12,188,335	20.00	2.4
	TOTAL COMPUTER HARDWARE			61,429,834.00	32,471,371	28,958,463	12,188,335	19.84	
391.12	COMPUTER HARDWARE - AMI	5-SQ	0	4,963,598.74	3,366,842	1,596,757	992,720	20.00	1.6
391.13	COMPUTER HARDWARE - MDM	5-SQ	0	2,637,348.63	2,110,000	527,349	527,349	20.00	1.0
	TOTAL OFFICE FURNITURE AND EQUIPMENT			87,605,935.41	46,148,254	41,457,682	14,946,779	17.06	
TRANSPORTATION EQUIPMENT									
392.10	AUTOS	11-S2.5	10	84,739.91	124,957	(48,691)	0	-	-
392.20	LIGHT TRUCKS	14-L2.5	10	4,591,051.25	3,174,966	956,980	85,627	1.87	11.2
392.30	MEDIUM TRUCKS	17-L2.5	10	1,580,580.40	1,068,461	354,061	25,537	1.62	13.9
392.40	HEAVY TRUCKS	20-R4	10	426,366.29	25,177	358,552	25,584	6.00	14.0
392.50	OTHER	16-L2	10	1,115,851.05	679,047	325,219	25,415	2.28	12.8
392.60	AIRPLANE	12-S1.5	30	6,566,805.61	3,824,370	772,394	69,088	1.36	8.7
	TOTAL TRANSPORTATION EQUIPMENT			14,365,394.71	8,896,979	2,718,515	251,251	1.75	
393.00	STORES EQUIPMENT	25-SQ	0	5,342,387.50	1,472,196	3,870,192	213,648	4.00	18.1
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT	20-SQ	0	16,889,163.44	6,491,747	10,397,417	844,203	5.00	12.3
395.00	LABORATORY EQUIPMENT	15-SQ	0	1,507,790.94	489,589	1,018,202	100,503	6.67	10.1
POWER OPERATED EQUIPMENT									
396.30	MEDIUM TRUCKS	16-L2	0	59,501.89	59,502	0	0	-	-
396.50	OTHER	16-S0	0	1,930,686.55	1,371,845	558,842	62,577	3.24	8.9
	TOTAL POWER OPERATED EQUIPMENT			1,990,188.44	1,431,347	558,842	62,577	3.14	

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DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT (8)	RATE (9)=(8)/(5)	
COMMUNICATION EQUIPMENT									
397.00 COMMUNICATION EQUIPMENT		15-SQ	0	93,404,872.21	31,936,150	61,468,722	6,228,381	6.67	9.9
397.12 AMI		15-SQ	0	7,530,512.10	1,631,234	5,899,278	502,392	6.67	11.7
397.20 PORTABLE		10-SQ	0	3,516,923.10	2,199,421	1,317,502	351,560	10.00	3.7
TOTAL COMMUNICATION EQUIPMENT				104,452,307.41	35,766,806	68,685,502	7,082,333	6.78	
398.00 MISCELLANEOUS EQUIPMENT		10-SQ	0	707,381.78	402,250	305,132	70,744	10.00	4.3
<b>TOTAL DEPRECIABLE COMMON PLANT</b>				<b>395,947,482.60</b>	<b>116,288,140</b>	<b>292,841,892</b>	<b>27,541,449</b>	<b>6.96</b>	
<b>RESERVE ADJUSTMENT FOR AMORTIZATION - ELECTRIC PLANT</b>									
391.00 OFFICE FURNITURE AND EQUIPMENT					(120)		24	**	
391.10 OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE					222,255		(44,451)	**	
391.12 OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE					(54,649)		10,930	**	
393.00 STORES EQUIPMENT					(33,298)		6,660	**	
394.00 TOOLS, SHOP AND GARAGE EQUIPMENT					(117,000)		23,400	**	
395.00 LABORATORY EQUIPMENT					286,400		(57,280)	**	
395.12 LABORATORY EQUIPMENT - AMI					40,100		(8,020)	**	
397.00 COMMUNICATION EQUIPMENT					(1,610,000)		322,000	**	
397.50 COMMUNICATION EQUIPMENT - SUB INTEGRATION					(284,000)		56,800	**	
397.60 COMMUNICATION EQUIPMENT - DISTRIBUTION					(8,452)		1,690	**	
398.00 MISCELLANEOUS EQUIPMENT					4,865		(973)	**	
<b>TOTAL RESERVE FOR AMORTIZATION - ELECTRIC PLANT</b>					<b>(1,553,899)</b>		<b>310,780</b>		
<b>RESERVE ADJUSTMENT FOR AMORTIZATION - GAS PLANT - WASHINGTON AND IDAHO</b>									
391.10 OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE					161,492		(32,298)	**	
393.00 STORES EQUIPMENT					(3,250)		650	**	
394.00 TOOLS, SHOP AND GARAGE EQUIPMENT					(67,400)		13,480	**	
395.00 LABORATORY EQUIPMENT					19,568		(3,914)	**	
395.12 LABORATORY EQUIPMENT - AMI					(320)		64	**	
397.00 COMMUNICATION EQUIPMENT					(98,015)		19,603	**	
397.12 COMMUNICATION EQUIPMENT - AMI					(730)		146	**	
<b>TOTAL RESERVE FOR AMORTIZATION - GAS PLANT - WASHINGTON AND IDAHO</b>					<b>11,345</b>		<b>(2,269)</b>		
<b>RESERVE ADJUSTMENT FOR AMORTIZATION - GAS PLANT - ALLOCATED ALL</b>									
391.10 OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE					(23,872)		4,774	**	
394.00 TOOLS, SHOP AND GARAGE EQUIPMENT					163,400		(32,680)	**	
395.00 LABORATORY EQUIPMENT					1,450		(290)	**	
397.00 COMMUNICATION EQUIPMENT					(22,870)		4,574	**	
<b>TOTAL RESERVE FOR AMORTIZATION - GAS PLANT - ALLOCATED ALL</b>					<b>118,108</b>		<b>(23,622)</b>		
<b>RESERVE ADJUSTMENT FOR AMORTIZATION - GAS PLANT - OREGON</b>									
391.10 OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE					(39)		8	**	
393.00 STORES EQUIPMENT					(2,540)		508	**	
394.00 TOOLS, SHOP AND GARAGE EQUIPMENT					136,761		(27,352)	**	
395.00 LABORATORY EQUIPMENT					(39)		8	**	
397.00 COMMUNICATION EQUIPMENT					274,597		(54,919)	**	
398.00 MISCELLANEOUS EQUIPMENT					(825)		165	**	
<b>TOTAL RESERVE FOR AMORTIZATION - GAS PLANT - OREGON</b>					<b>407,915</b>		<b>(81,582)</b>		

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DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT (8)	RATE (9)=(8)/(5)	
<b>RESERVE ADJUSTMENT FOR AMORTIZATION - COMMON PLANT</b>									
391.00	OFFICE FURNITURE AND EQUIPMENT - OFFICE FURNITURE AND EQUIPMENT				4,290,000		(858,000)	**	
391.10	OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE				9,461,027		(1,892,205)	**	
391.12	OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE - AMI				(249,166)		49,833	**	
391.13	OFFICE FURNITURE AND EQUIPMENT - COMPUTER HARDWARE - MDM				346,129		(69,226)	**	
393.00	STORES EQUIPMENT				134,000		(26,800)	**	
394.00	TOOLS, SHOP AND GARAGE EQUIPMENT				137,000		(27,400)	**	
395.00	LABORATORY EQUIPMENT				236,500		(47,300)	**	
397.00	COMMUNICATION EQUIPMENT				(8,500,000)		1,700,000	**	
397.12	COMMUNICATION EQUIPMENT - AMI				(438,789)		87,758	**	
397.20	COMMUNICATION EQUIPMENT - PORTABLE				1,511,650		(302,330)	**	
398.00	MISCELLANEOUS EQUIPMENT				301,442		(60,288)	**	
	<b>TOTAL RESERVE FOR AMORTIZATION - COMMON PLANT</b>				<b>7,229,793</b>		<b>(1,445,958)</b>		
	<b>TOTAL DEPRECIABLE ELECTRIC, GAS AND COMMON PLANT</b>				<b>6,541,255,908.07</b>	<b>2,297,891,258</b>	<b>5,545,544,906</b>		<b>2.89</b>
<b>AMORTIZABLE AND LAND - ELECTRIC PLANT</b>									
302.00	FRANCHISES AND CONSENTS			46,749,053.98	15,137,411				
303.00	MISCELLANEOUS INTANGIBLE PLANT			7,494,383.92	2,004,315				
303.10	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE - 5 YEAR LIFE			26,547,593.96	12,553,034				
303.13	MISCELLANEOUS INTANGIBLE PLANT - SAAS - 5 YEAR LIFE			1,768,920.12	189,115				
303.35	MISCELLANEOUS INTANGIBLE PLANT - SPOKANE RIVER			4,470,355.82	642,365				
310.20	LAND			3,430,297.19					
317.00	ARO			15,536,252.10	2,787,806				
330.20	LAND			6,980,599.56					
330.21	LAND - CONSERVATION - HABITAT			5,989,376.79					
330.22	LAND			1,328,873.64	(79,240)				
330.25	LAND - CONSERVATION - FISHERIES			4,113,031.49					
330.45	LAND			175,981.22					
340.20	LAND			905,167.67					
347.00	ARO			351,681.62	104,106				
350.20	RIGHTS OF WAY			7,208,600.59					
360.11	LAND HELD FOR FUTURE USE			9,544,433.56					
360.20	LAND			8,945,301.21					
360.50	LAND - EASEMENTS			367,850.00					
370.30	METERS - WASHINGTON STANDARD - RESERVE ADJUSTMENT				(20,369,298)				
389.20	LAND			885,665.10					
390.20	STRUCTURES AND IMPROVEMENTS - LEASEHOLD			2,359,388.70	747,563				
	<b>TOTAL AMORTIZABLE AND LAND - ELECTRIC PLANT</b>			<b>155,152,808.24</b>	<b>13,717,176</b>				
<b>AMORTIZABLE AND LAND - GAS PLANT - WASHINGTON AND IDAHO</b>									
303.00	MISCELLANEOUS INTANGIBLE PLANT			1,794,111.29	436,894				
350.10	LAND			413,240.40					
374.20	LAND			88,594.70					
381.00	METERS - WASHINGTON - RESERVE ADJUSTMENT				(4,107,087)				
389.20	LAND			3,071,016.65					
	<b>TOTAL AMORTIZABLE AND LAND - GAS PLANT - WASHINGTON AND IDAHO</b>			<b>5,366,963.04</b>	<b>(3,670,193)</b>				
<b>AMORTIZABLE AND LAND - GAS PLANT - ALLOCATED ALL</b>									
303.10	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE - 5 YEAR LIFE			450,194.49	177,509				
350.10	LAND			899,489.94					
	<b>TOTAL AMORTIZABLE AND LAND - GAS PLANT - ALLOCATED ALL</b>			<b>1,349,684.43</b>	<b>177,509</b>				
<b>AMORTIZABLE AND LAND - GAS PLANT - OREGON</b>									
303.00	MISCELLANEOUS INTANGIBLE PLANT			425,950.62	120,960				
304.00	LAND			59,923.87					
350.10	LAND			784.49					
374.20	LAND			217,817.94					
389.20	LAND			845,516.91					
	<b>TOTAL AMORTIZABLE AND LAND - GAS PLANT - OREGON</b>			<b>1,549,993.83</b>	<b>120,960</b>				

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DEPRECIABLE GROUP (1)	PROBABLE RETIREMENT DATE (2)	SURVIVOR CURVE (3)	NET SALVAGE PERCENT (4)	ORIGINAL COST AS OF DECEMBER 31, 2021 (5)	BOOK DEPRECIATION RESERVE (6)	FUTURE BOOK ACCRUALS (7)	CALCULATED ANNUAL ACCRUAL		COMPOSITE REMAINING LIFE (10)=(7)/(8)
							AMOUNT (8)	RATE (9)=(8)/(5)	
<b>AMORTIZABLE AND LAND - COMMON PLANT</b>									
303.00	MISCELLANEOUS INTANGIBLE PLANT			6,416,550.79	4,759,832				
303.10	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE - 2 YEAR LIFE			321,950.47	57,006				
303.10	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE - 3 YEAR LIFE			7,429,923.59	576,601				
303.10	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE - 5 YEAR LIFE			174,435,158.14	94,998,734				
303.11	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE - 15 YEAR LIFE (COMPASS)			100,831,203.22	47,502,940				
303.12	MISCELLANEOUS INTANGIBLE PLANT - SOFTWARE - 12.5 YEAR LIFE (MDM)			30,329,509.30	10,189,359				
303.13	MISCELLANEOUS INTANGIBLE PLANT - SAAS - 2 YEAR LIFE			67,095.71	18,582				
303.13	MISCELLANEOUS INTANGIBLE PLANT - SAAS - 3 YEAR LIFE			595,584.50	56,688				
303.13	MISCELLANEOUS INTANGIBLE PLANT - SAAS - 5 YEAR LIFE			6,554,460.92	496,413				
389.20	LAND			10,148,559.81					
<b>TOTAL AMORTIZABLE AND LAND - COMMON PLANT</b>				<b>337,129,996.45</b>	<b>158,656,155</b>				
<b>TOTAL ELECTRIC, GAS AND COMMON PLANT</b>				<b>7,041,805,354.06</b>	<b>2,466,892,865</b>				

\* LIFE SPAN PROCEDURE WAS USED. CURVE SHOWN IS INTERIM SURVIVOR CURVE.  
\*\* 5-YEAR AMORTIZATION OF RESERVE RELATED TO AMORTIZATION ACCOUNTING.

NOTE: FUTURE ADDITIONS FOR IDAHO AMI METERS WILL USE A RATE OF 7.03% BASED ON A 15-S2.5 SURVIVOR CURVE AND (2) NET SALVAGE PERCENT.

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ATTACHMENT B

Settlement Depreciation Rates

Line	Account Number	Description	[1]	[2]	[3]	[4]	[5]	[6]	[7]
			Filed Study Rate			Settled			
			Filed Study Rate %	Curve - Life	Net Salvage %	Settled Study Rate	Curve -Life	Net Salvage %	
COMMON PLANT									
GENERAL PLANT - CD AA									
1	389.3	Removing Property of Others	1.67	65-R4	0	1.67	65-R4	0	
2	389.4	Land Easements	1.26	65-R4	0	1.26	65-R4	0	
3	390.1	Structures and Improvements - Company	2.45	50-R2	-10	2.45	50-R2	-10	
4	391.0	Office Furniture and Equipment	6.67	15-SQ	0	6.67	15-SQ	0	
5	391.1	Computer Hardware	20.00	5-SQ	0	20.00	5-SQ	0	
6	391.12	Computer Hardware - AMI	20.00	5-SQ	0	20.00	5-SQ	0	
7	391.13	Computer Hardware - MDM	20.00	5-SQ	0	20.00	5-SQ	0	
8	392.1	Transportation Equipment - Autos	0.00	11-S2.5	10	0.00	11-S2.5	10	
9	392.2	Transportation Equipment - Light Trucks	1.87	14-L2.5	10	1.87	14-L2.5	10	
10	392.3	Transportation Equipment - Medium Trucks	1.62	17-L2.5	10	1.62	17-L2.5	10	
11	392.4	Transportation Equipment - Heavy Trucks	6.00	20-R4	10	6.00	20-R4	10	
12	392.5	Transportation Equipment - Other	2.28	16-L2	10	2.28	16-L2	10	
13	392.6	Transportation Equipment - Airplane	1.36	12-S1.5	30	1.36	12-S1.5	30	
14	393.0	Stores Equipment	4.00	25-SQ	0	4.00	25-SQ	0	
15	394.0	Tools, Shop and Garage Equipment	5.00	20-SQ	0	5.00	20-SQ	0	
16	395.0	Laboratory Equipment	6.67	15-SQ	0	6.67	15-SQ	0	
17	396.3	Power Operated Equipment - Medium Trucks	0.00	16-L2	0	0.00	16-L2	0	
18	396.5	Power Operated Equipment - Other	3.24	16-S0	0	3.24	16-S0	0	
19	397.0	Communication Equipment	6.67	15-SQ	0	6.67	15-SQ	0	
20	397.12	Communication Equipment - AMI	6.67	15-SQ	0	6.67	15-SQ	0	
21	397.2	Communication Equipment - Portable	10.00	10-SQ	0	10.00	10-SQ	0	
22	398.0	Miscellaneous Equipment	10.00	10-SQ	0	10.00	10-SQ	0	
COMMON GAS GENERAL PLANT - GD AA									
23	391.1	Computer Hardware	20.00	5-SQ	0	20.00	5-SQ	0	
24	394.0	Tools, Shop and Garage Equipment	5.00	20-SQ	0	5.00	20-SQ	0	
25	395.0	Laboratory Equipment	6.67	15-SQ	0	6.67	15-SQ	0	
26	397.0	Communication Equipment	6.67	15-SQ	0	6.67	15-SQ	0	

Line	Account Number	Description	[1]	[2]	[3]	[4]	[5]	[6]	[7]
			Filed			Settled			
			Filed Study Rate	Curve - Life	Net Salvage %	Settled Study Rate	Curve -Life	Net Salvage %	
GAS PLANT -OREGON									
NATURAL GAS STORAGE AND PROCESSING PLANT									
27	350.2	Rights of Way	1.79	65-R4	0	1.79	65-R4	0	
28	351.1	Structures and Improvements	2.21	55-R2.5	-5	2.21	55-R2.5	-5	
29	351.2	Compressor Station	1.89	55-R2.5	-5	1.89	55-R2.5	-5	
30	351.4	Office	1.74	55-R2.5	-5	1.74	55-R2.5	-5	
31	352.0	Storage Wells	1.73	60-R4	0	1.55	65-R2.5	0	
32	352.2	Reservoirs	2.03	50-R4	0	2.03	50-R4	0	
33	352.3	Non-Recoverable Gas	1.95	50-R4	0	1.95	50-R4	0	
34	353.0	Lines	1.63	65-R4	0	1.63	65-R4	0	
35	354.0	Compressor Station Equipment	1.83	55-R4	0	1.76	55-R2	0	
36	355.0	Measuring and Regulating Equipment	1.09	35-R3	0	1.09	35-R3	0	
37	356.0	Purification Equipment	3.77	35-S2.5	0	3.77	35-S2.5	0	
38	357.0	Other Equipment	2.09	45-R2	0	2.09	45-R2	0	
DISTRIBUTION PLANT									
39	374.4	Land - Easements	1.67	60-R4	0	1.67	60-R4	0	
40	375.0	Structures and Improvements	2.56	45-R2	0	2.56	45-R2	0	
41	376.0	Mains	2.11	55-R3	-20	1.94	57-R3	-17	
42	378.0	Measuring and Regulating Station Equipment - General	4.02	32-R2	-15	4.02	32-R2	-15	
43	379.0	Measuring and Regulating Station Equipment - City Gate	3.22	37-S0.5	-15	3.22	37-S0.5	-15	
44	380.0	Services	2.15	52-R3	-25	1.99	54-R3	-23	
45	381.0	Meters	3.34	35-R1	-3	3.34	35-R1	-3	
46	385.0	Industrial Measuring and Regulating Station Equipment	1.44	65-R2.5	-15	1.44	65-R2.5	-15	
47	387.0	Other Equipment	0.00	18-SQ	0	0.00	18-SQ	0	
TRANSPORTATION EQUIPMENT									
48	392.2	Light Trucks	5.50	14-L2.5	10	5.50	14-L2.5	10	
49	392.3	Medium Trucks	2.90	17-L2.5	10	2.90	17-L2.5	10	
50	392.5	Other	5.85	16-L2	10	5.85	16-L2	10	
GAS GENERAL PLANT									
51	390.1	Structures and Improvements - Company	3.37	30-R3	-5	3.37	30-R3	-5	
52	391.1	Office Furniture and Equipment - Computer Hardware	20.00	5-SQ	0	20.00	5-SQ	0	
53	393.0	Stores Equipment	4.00	25-SQ	0	4.00	25-SQ	0	
54	394.0	Tools, Shop and Garage Equipment	5.00	20-SQ	0	5.00	20-SQ	0	
55	395.0	Laboratory Equipment	6.67	15-SQ	0	6.67	15-SQ	0	
56	396.5	Power Operated Equipment - Other	0.00	16-S0	0	0.00	16-S0	0	
57	397.0	Communication Equipment	6.67	15-SQ	0	6.67	15-SQ	0	
58	398.0	Miscellaneous Equipment	10.00	10-SQ	0	10.00	10-SQ	0	



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Attachment C

## Settlement Depreciation Tables

1. The Company's original filing had proposed an increase to depreciation and amortization expense of \$484,580, as shown in Table No. 1.

**Table No. 1 – Change to Depreciation Expense - As Filed**

Change to Depreciation Expense - As Filed			
	Oregon Direct Plant	Oregon Share Common Plant	Total
General Plant	37,822	32,478	70,300
Underground Storage Plant	8,450	-	8,450
Gas Distribution Plant	730,844	-	730,844
Transportation Plant	(41,236)	(6,106)	(47,342)
Subtotal	735,880	26,372	762,252
Reserve Adjustment Amortization	(81,583)	(196,089)	(277,672)
	654,297	(169,717)	484,580

The Settling Parties agreed to a reduction in depreciation and amortization expense of \$193,591, as shown in Table No. 2.

**Table No. 2 – Change to Depreciation Expense - As Settled**

Change to Depreciation Expense - As Settled			
	Oregon Direct Plant	Oregon Share Common Plant	Total
General Plant	37,822	32,478	70,300
Underground Storage Plant	3,683	-	3,683
Gas Distribution Plant	57,440	-	57,440
Transportation Plant	(41,236)	(6,106)	(47,342)
Subtotal	57,709	26,372	84,081
Reserve Adjustment Amortization	(81,583)	(196,089)	(277,672)
	(23,874)	(169,717)	(193,591)

The change from the filed case increase in depreciation/amortization expense of \$484,580 to a reduction of \$193,591 in the settled amount, is a net reduction of \$678,171 from the filed case. The accounts that the Parties agreed to update in the settlement are shown in Table No. 3.

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Settlement Depreciation Tables

**Table No. 3 – Change to Depreciation Expense By Account**

FERC	Plant Description	Filed			Settled			Filed	Settled	Change
		Curve	Salvage	Depreciation Rate	Curve	Salvage	Depreciation Rate	Expense	Expense	
Underground Storage Equipment										
352	Storage Wells	60-R4	0	1.73%	65-R2.5	0	1.55%	\$ 24,801	\$ 22,140	\$ (2,661)
354	Compressor Station Equipment	55-R4	0	1.83%	55-R2	0	1.76%	\$ 59,068	\$ 56,962	\$ (2,106)
Total Change - Underground Storage Plant										\$ (4,767)
Distribution Plant										
376	Mains	55-R3	-20	2.11%	57-R3	-17	1.94%	\$ 5,693,794	\$ 5,223,452	\$ (470,342)
380	Services	52-R3	-25	2.15%	54-R3	-23	1.99%	\$ 2,796,194	\$ 2,593,132	\$ (203,062)
Total Change - Distribution Plant										\$ (673,404)
Total Impact of Settlement to Depreciation Expense Compared to Filed Depreciation Rates										\$ (678,171)

A summary of the actual 2021 Oregon depreciation/amortization expense compared to the final settlement depreciation/amortization expense are shown in Table No. 4.

**Table No. 4 – Actual Oregon Depreciation Expense vs Settlement Depreciation Expense**

	Direct	Allocated	Total
2021 Depreciation Expense - Oregon	\$ 10,532,406	\$ 6,330,827	\$ 16,863,233
Impact of Depreciation Study - As filed	654,297	(169,717)	484,580
As Filed Depreciation Expense	11,186,703	6,161,110	17,347,813
Impact of Settlement	(678,171)	-	(678,171)
As Settled Depreciation Expense	\$ 10,508,532	\$ 6,161,110	\$ 16,669,642
Change to Depreciation Expense - 2021 Actual vs Settled	\$ (23,874)	\$ (169,717)	\$ (193,591)

BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON

UM-2277

In the Matter of	)	
	)	
AVISTA CORPORATION, dba AVISTA UTILITIES	)	AFFIDAVIT OF ELIZABETH M. ANDREWS
	)	
Request for Authority to Revise Book Depreciation Rates	)	
<hr/>		
STATE OF WASHINGTON	)	
	) as	
County of Spokane	)	

I, Elizabeth M. Andrews, being first duly sworn on oath, depose and say:

1. I am the Senior Manager, Revenue Requirements in the Regulatory Affairs Department of Avista Corporation (“Avista”).
2. On behalf of AVISTA, I was one of the parties that sponsored the joint testimony submitted in this docket entitled Stipulating Parties Exhibit 100.
3. My portion of the statements in the joint testimony are true and accurate based on my information and belief and my responses would be the same if I were to answer those same questions today.

SIGNED this 21<sup>st</sup> day of June, 2023.

Elizabeth M. Andrews  
Elizabeth M. Andrews

SUBSCRIBED AND SWORN to before me this 21<sup>st</sup> day of June, 2023.



Debbie Deubel  
Notary Public for Spokane County  
My Commission Expires: 05-09-2025