

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: October 26, 2023**

REGULAR X **CONSENT** _____ **EFFECTIVE DATE** November 1, 2023

DATE: October 17, 2023

TO: Public Utility Commission

FROM: Anna Kim

THROUGH: Bryan Conway and Marc Hellman **SIGNED**

SUBJECT: AVISTA UTILITIES:
(Docket No. UG 467/Advice No. 23-02-G)
Reflects changes in the cost of purchased gas and the amortization rate for the Purchased Gas Adjustment (PGA) balancing account.

STAFF RECOMMENDATION:

Staff recommends approval of Avista Corporation dba Avista Utilities' (Avista, AVA, or Company) Advice No. 23-02-G, which updates the Company's 2023 annual Purchase Gas Adjustment (PGA) tariff sheets, for service rendered on and after November 1, 2023.

DISCUSSION:

Issue

Whether the Public Utility Commission of Oregon (Commission) should approve Avista's 2023 annual PGA as reflected in its Advice No. 23-02-G.

Applicable Rule or Law

ORS 757.205 requires public utilities to file all rates, rules, and charges with the Commission. ORS 757.210 provides that the Commission may approve tariff changes if they are fair, just, and reasonable. Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the changes.

ORS 757.259(5) states that unless subject to an automatic adjustment clause, amounts deferred under ORS 757.259 shall be allowed in rates only to the extent authorized by the Commission in a proceeding under ORS 757.210 to change rates and upon review

of the utility's earnings at the time of application to amortize the deferral. The Commission may require that amortization of deferred amounts be subject to refund. The Commission's final determination on the amount of deferrals allowable in the rates of the utility is subject to a finding by the Commission that the amount was prudently incurred by the utility.

ORS 757.259(6) states that the overall average rate impact of the amortizations authorized under this section in any one year may not exceed three percent of the utility's gross revenues for the preceding calendar year. ORS 757.259(7) allows the Commission to consider an overall average rate impact greater than that specified in subsection (6) for natural gas commodity and pipeline transportation costs incurred by a natural gas utility, if the Commission finds that allowing a higher amortization rate is reasonable under the circumstances.

OAR 860-022-0025 requires that revised tariff filings include statements showing the change in rates, the number of customers affected and resulting change in annual revenue, and the reasons for the tariff revision.

OAR 860-022-0030 requires that tariff filings which result in increased rates include statements showing the number of customers affected, the annual revenue under existing schedules, the annual revenue under proposed schedules, the average monthly bills under existing and proposed schedules, and the reasons supporting the proposed tariff.

The PGA mechanism was originally established by Order No. 89-1046 to minimize the frequency of gas cost-related rate changes and the fluctuation of rate levels pursuant to ORS 757.259(2)(e). Since the mechanism's creation in 1989, the Commission has issued a series of orders concerning PGA filings through open-docket UM 1286.¹ Order No. 18-144 is the most recent of these orders, and revises the Commission's procedures and requirements of the Natural Gas Portfolio Development Guidelines in Docket No. UM 1286 by adding language concerning review and approval of long-term hedging instruments in a local distribution company's (LDC) natural gas portfolio. No changes were made to the PGA Filing Guidelines previously established in Order No. 14-238.

On December 16, 2021, the Department of Environmental Quality (DEQ) adopted the Oregon Climate Protection Program (CPP) rules, which set a cap on greenhouse gas

¹ Order No. 08-504 established the form of the PGA Mechanism. PGA Guidelines were acknowledged by the Commission in Docket No. UM 1286, Order No. 09-248, on June 23, 2009. The Guidelines in Docket No. UM 1286 have been modified four different times since they were first acknowledged by the Commission, in Order No. 10-197, in Order No. 11-196, in Order No. 14-238, and in Order No. 18-144.

emissions from transportation fuels and natural gas, and are set forth in OAR 340-271-0010 through OAR 340-271-9000.

Analysis

On July 31, 2023, Avista submitted Advice No. 23-02-G, which constitutes its annual PGA filing (Initial 2023 PGA Filing). On September 15, 2023, Avista supplemented its initial filing (Supplemental 2023 PGA Filing), which updated its commodity costs to reflect index purchases based on 60-day basin-weighted average prices as of August 31, 2023. In aggregate, the filings are commonly referred to as the 2023 PGA Filing. The 2023 PGA Filing is comprised of two parts: a forward-looking part (Projected Purchased Gas Cost for the 2023-2024 Gas Year) and a backward-looking part (True-Up of the 2022-2023 Gas Year).

The Projected Purchased Gas Cost for the 2023-2024 Gas Year includes the costs of natural gas for the upcoming gas year (i.e., November 1, 2023, to October 31, 2024) and results in the new rates set forth in Schedule 461.² The True-Up of the 2022-2023 Gas Year trues up the costs of natural gas in the previous gas year (November 1, 2022, to October 31, 2023) by comparing the amount collected from customers in that year with the actual costs incurred by the Company in the same year.³ Any over or under-collection from customers in the 2022-2023 Gas Year, together with any over or under-collection from previous years,⁴ is either given back (in the case of over-collection) or surcharged (in the case of under-collection) to customers in the upcoming gas year. The True-Up of the 2022-2023 Gas Year results in the new rates set forth in Schedule 462.⁵

Projected Purchased Gas Cost for the 2023-2024 Gas Year (Rate Schedule 461)

The Projected Purchased Gas Cost for the 2023-2024 Gas Year comprises two rate components: 1) the commodity component rate and, 2) the capacity or demand component rate. The rates for these components are represented in Table 1 on a dollar per therm basis.

² Schedule 461 is titled "Purchased Gas Cost Adjustment Provision - Oregon."

³ The 2022-2023 Gas Year began November 1, 2022, and concludes October 31, 2023. However, per page 10 of Appendix A to Order No. 14-238 in Docket No. UM 1286 (See: <https://apps.puc.state.or.us/orders/2014ords/14-238.pdf>), all deferrals to be amortized into rates will be based on June deferral balances plus interest for July-October, and the deferrals that occur after June will be carried forward to the next PGA period.

⁴ Any over-collection or under-collection from previous years is because actual volumetric sales of natural gas will always be different from forecasted volumetric sales. Since amortizations are intended to be recovered in volumetric forecasted sales, a remaining balance will always be present.

⁵ Schedule 462 is titled "Gas Cost Rate Adjustment - Oregon."

Table 1: Projected Purchased Gas Cost for 2023-2024
 (\$/Therm or as noted otherwise)

Item		Current Rate 2022-23 Gas Year ⁶	Proposed Rate 2023-24 Gas Year	Change
Commodity	(A)	\$0.44416	\$0.33928	(\$0.10488)
Demand	(B)	\$0.16082	\$0.15645	(\$0.00437)
Total Gas Cost	(C = A+B)	\$0.60498	\$0.49573	(\$0.10925)

The commodity component of WACOG proposed for the 2023-2024 Gas Year is decreasing by \$0.10488 per therm, a decrease of 18.5 percent from the previous PGA gas year, as shown in Table 1. Last year, wholesale natural gas prices were predicted to increase significantly. At this point, gas prices are predicted to decline from the last year's prediction.

In 2022, several factors led to increased natural gas prices and elevated price volatility:

- Global market disruption after Russia invaded Ukraine, and Western Countries responded with economic sanctions – Liquefied Natural Gas (LNG) exports from the U.S to Europe surged.
- Surging inflation associated with a healthy job market increased demand for production inputs;
- Storage inventories fell below the five-year average level in 2022 and failed to recover during the 2022 injection season.
- Last year was a low hydro year, forcing power generation to rely more on gas fired generators.

Over the course of the last 12 months, the wholesale market price of gas has declined overall.

- Natural gas production increased in 2023, leading to lower prices now than forecast and going forward.
- Prices along the west coast remain relatively high in contrast to gas purchased at AECO. Limited and fully subscribed import capacity from AECO to PNW causes a disconnect between AECO and west coast prices during times of high demand. Avista's Oregon customers are supplied through contracts at AECO, resulting in even lower gas prices.
- The volume of natural gas exports remains high, which may increase gas prices.

⁶ These values are addressed in 2023 Confidential Oregon PGA Work Papers filed September 15, 2023, Tabs: Calculation – Commodity and Calculation - Demand.

- The amount of natural gas in storage is high nationally and available storage space will increase next year with the expansion of Aliso Canyon. Starting the winter with a high balance combined with normal winter temperatures should lead to lower prices for Winter 2023-2024.
- The recent conflict between Hamas and Israel may also impact the market although it is unclear at the time what effect the conflict will have.

The proposed demand component reflects a decrease of approximately 0.00437 per therm, a decrease of 2.7 percent from the previous PGA gas year.

Current Impact of Oregon DEQ Climate Protection Plan (CPP)

Avista reports no immediate impact of the CPP herein. Note that Avista currently does not have an approved Renewable Natural Gas (RNG) or hydrogen plan.

Sharing Election

Avista again elects 90/10 sharing.

Filing and Portfolio Guidelines

Avista's 2023 PGA Filing meets the PGA Filing Guidelines and the Natural Gas Portfolio Guidelines. Avista has demonstrated its adherence to these Guidelines with regard to natural gas supplies and financial hedges.⁷ Staff's conclusions are supported by the Company's comprehensive work papers and by review and discussion as part of the quarterly PGA update meetings.

Staff reviewed Avista's forecasted commodity and demand costs to determine whether the Company complied with the Commission's Natural Gas Portfolio Development Guidelines (Portfolio Guidelines). Accepted "best practices" for the purchase of natural gas supply by a local distribution company (LDC) result in a portfolio that balances the objectives of reliability, cost control, and managing price volatility using diversity, flexibility, and balance in a LDC's gas portfolio. The Portfolio Guidelines implement these "best practices" for Oregon LDCs. The Portfolio Guidelines also require each gas utility to include certain information related to its gas supply portfolio with its annual PGA filing. This information assists the Commission in determining the prudence of the LDC's costs.

Avista's portfolio preparation and planning process meets the standards in Section III of the Portfolio Guidelines related to portfolio planning, as do Avista's physical gas contracts and financial transactions related to natural gas pricing. Avista has also

⁷ The Portfolio Guidelines require gas utilities to include certain information related to their gas supply portfolio with their annual PGA filing. Staff's analysis of and conclusions regarding Avista's natural gas supply portfolio and related purchasing strategies and actions are based on the Portfolio Guidelines provided in Docket No. UM 1286.

demonstrated its adherence to the Portfolio Guidelines with regard to natural gas supplies and financial hedges. In addition, Avista has provided all the information called for in Section IV (Information and Work Papers), and Section V (Supporting Data and Analysis) of the Portfolio Guidelines.

True-Up of the 2022-2023 Gas Year (Schedule 462)

Table 2: True-Up of the 2022-2023 Gas Year ⁸
 (\$/Therm or as noted otherwise)

Item		Current Rate ⁹	Proposed Rate ¹⁰	Change
Commodity Amortization ¹¹	(D)	\$0.04133	(\$0.03504)	(\$0.07637)
Demand Amortization ¹²	(E)	\$0.01100	(\$0.01985)	(\$0.03085)
Total Amortization	(F=D+E)	\$0.05233	(\$0.05489)	(\$0.10722)

Deferral and amortization of residual gas costs from the current and previous PGA periods results in a ratepayer credit of approximately \$10.5 million due to over-collection in the last year. This is due to a combination of commodity and demand amortization costs. There is a forecasted decrease of commodity amortization of approximately \$7.80 million for the period from November 2023 to October 2024 compared to the period from November 2022 to October 2023.¹³ This credit will decrease the gas commodity amortization price by \$0.07637 per therm after accounting for the commodity cost variance sharing between the Company and customers. There is also a forecasted decrease of demand amortization of approximately \$2.7 million for the November 2023 to October 2024 period is forecast compared to the period from November 2022 to October 2023.

Three Percent Test

Pursuant to ORS 757.259(6), ORS 757.259(7), and OAR 860-027-0300, the annual average rate impact of the amortizations authorized under the statutes may not exceed three percent of the natural gas utility's gross revenues for the preceding calendar year unless the Commission finds that allowing a higher amortization rate is reasonable under the circumstances.

⁸ Positive numbers represent surcharges; negative numbers or numbers in parentheses represent refunds.

⁹ Approved by the Commission in Order No. 22-420 of Docket No. UG 438.

¹⁰ Addressed in Avista's Supplemental Advice No. 22-04-G filed September 9, 2022.

¹¹ These figures are for Weighted Average Cost of Gas (WACOG) Deferral only.

¹² These figures are for Firm Demand Deferral only.

¹³ Addressed in 2023 Confidential Oregon PGA Work Papers (09.05.23) Tab: Attachment C.

The resulting annual average rate impact from the PGA amortization and four other filings calculated in accordance with ORS 757.259 is a decrease in rates compared to the Company's 2022 total gross revenues, which is below the three percent amortization limitation specified in ORS 757.259(6).¹⁴

The percentage changes in Table 3 below reflect the change in revenues resulting from the PGA filing, and four other advice filings with an effective date of November 1, 2023, related to the non-base rate portion of the Company's gross revenues for the 2023-2024 gas year based on projected customer usage and differs from the three percent calculation.¹⁵

Table 3: Overall Commodity and Related Schedule Revenue and Rate Impact
 (Inclusive of prior COVID Deferral Costs)

Schedule	Description	Total Revenues at Current Rates	Revenue Increase / (Decrease)	Change (%)
410	Residential	\$38,857,035	(\$12,437,319)	(32%)
420	General	\$20,288,481	(\$6,493,774)	(32%)
424	Large General	\$3,205,617	(\$1,126,756)	(35%)
440	Interruptible	\$7,225,826	(\$3,001,862)	(42%)
444	Seasonal	\$140,733	(\$49,222)	(35%)
456	Transportation	(\$128,301)	\$18,452	(14%)
Total Commodity Only		\$69,589,391	(\$23,090,481)	(33%)

Table 3 addresses all PGA related schedules and has incremental costs to Seasonal and Interruptible Transportation over Table 4. Table 3 is the revenue associated with all adder schedules that have a rate change effective November 1 (PGA Schedules 461 and 462), decoupling, intervenor funding, regulatory fees, and LIRAP. Table 4 is PGA only (Schedules 461 and 462) resulting in less revenue compared to Table 3. When compared to other Utilities, the difference between the overall revenue change and the change resulting from the PGA only will vary based on whether their other non-PGA adder schedules are in a rebate or surcharge position.

¹⁴ The four other filings are: UG 468, UG 469, UG 470, and UG 471.

¹⁵ Addressed in 2023 Confidential Oregon PGA Work Papers (09.15.23), Tabs: Attachment A Adjust Sched. Summary and Attach B Adjust. Sched. Detail.

Table 4 below reflects only the change in revenues related to the gas commodity portion of the Company’s gross revenues, (Purchased Gas Cost Adjustment Provision; Schedule 461) and amortization of previous deferrals (Gas Cost Rate Adjustment; Schedule 462) for the 2023-2024 gas year based on projected customer usage.

Table 4: PGA ONLY Commodity Revenue and Bill Impact

Schedule	Description	Total Revenues at Current Rates	Revenue Increase / (Decrease)	Change (%)
410	Residential	\$35,497,932	(\$11,690,431)	(33%)
420	General	\$19,195,137	(\$6,321,479)	(33%)
424	Large General	\$3,009,948	(\$991,258)	(33%)
440	Interruptible	\$6,894,242	(\$2,573,856)	(37%)
444	Seasonal	\$132,189	(\$43,534)	(33%)
456	Int. Transportation	\$0	\$0	0%
Overall Commodity Only		\$64,729,448	(\$21,620,558)	(33%)

**Table 5: 2023-2024 PGA (Including OCAT)
 Proposed Rate & Bill Increases¹⁶
 Residential Bill Impacts**

Rate Schedule 410 – Residential Bill Impacts					
Average Therms	Customer Charge	Current Bill	Proposed Bill	Change in Bill	% Change in Bill
January					
93	\$10.50	\$142.10	\$120.68	(\$21.42)	(15.1%)
Annual / Monthly					
47	\$10.50	\$77.01	\$66.18	(\$10.83)	(14.1%)

Credits from NW Pipeline

On August 18, 2017, the Federal Energy Regulatory Commission (FERC) approved a Northwest Pipeline (NW Pipeline) Stipulation and Settlement Agreement in Docket No. RP17-346-000. Section 12.4 of the 2017 Settlement required NW Pipeline to file a

¹⁶ Values are drawn from Tab: Attachment D from work papers.

Natural Gas Act (“NGA”) Section 4 general rate case for rates to become effective not later than January 1, 2023, unless NW Pipeline entered a pre-filing settlement effectively satisfying the NGA Section 4 general rate case filing requirement. From September 2021 through June 2022 NW Pipeline worked with their shippers to resolve issues to avoid filing a full Section 4 general rate case.

On August 26, 2022, Northwest Pipelines filed a stipulation and settlement agreement. As part of this settlement, NW Pipeline would issue credits to shippers of record (2018-2022) to refund monies due to a reduction in the federal corporate income tax rate per the Tax cuts and Jobs Act signed into law on December 22, 2017. During last year’s PGA, the stipulation was known but did not get approved until after the PGA was finalized. FERC issued the approval on November 15, 2022. In response to the pending order, Avista agreed to flow the benefits to customers at a later date. Avista is now returning these credits through this PGA.

Conclusion

Avista’s 2023 PGA filing, and four other advice filings filed on July 31, 2023, reflect a revenue decrease of \$21.6 million or approximately 33 percent, effective November 1, 2023.

With all changes addressed herein, effective November 1, 2023, the monthly bill of a residential customer using an average of 47 therms per month will decrease by \$10.83, or -14.4 percent, from \$77.01 to \$66.18.

Avista has reviewed this memo and agrees with its contents.

PROPOSED COMMISSION MOTION:

Approve Avista’s Advice No. 23-02-G, which updates the Company’s 2023 annual PGA tariff sheets, for service rendered on and after November 1, 2023.

Attachment A: Avista Corp 2023 PGA and Related Dockets
 Incremental Revenue Change by Customer Rate Schedule (Inclusive of prior COVID Deferral Costs)¹⁷
 (Red) indicates negative numbers.

Customer Rate Schedule	Description	Gas Costs and Adjustment Revenues at Current Rates ¹⁸	Gas Costs and Adjustment Revenues at Proposed Rates	Incremental Change in \$ Revenue	% Change by Rate Schedule	% Contribution to Total Incremental Change
410	Residential	\$38,857,035	\$26,419,716	(\$12,437,319)	(32%)	54%
420	Small Commercial and Industrial	\$20,288,481	\$13,794,707	(\$6,493,774)	(32%)	28%
424	Large Commercial and Industrial	\$3,205,617	\$2,078,861	(\$1,126,756)	(35%)	5%
425	Transportation	\$0	\$0	\$0	0%	0%
439	Interruptible Transportation	\$0	\$0	\$0	0%	0%
440	Interruptible	\$7,225,826	\$4,223,964	(\$3,001,862)	(42%)	13%
444	Seasonal	\$140,733	\$91,511	(\$49,222)	(35%)	0%
456	Transportation	(\$128,301)	(\$109,849)	\$18,452	(14%)	0%
	Overall	\$69,589,391	\$46,498,910	(\$23,090,481)	(33%)	100%

¹⁷ Values are drawn from tab: "Attach A Adjust Sched Summary" in work papers.

¹⁸ Revenue at "Current" does not reflect current revenues, but rather what the revenues would be if existing rates continued to be in effect during the upcoming year (i.e., current rates times forecasted them). There will be small differences with the Advice filings.

Attachment B: Avista Corp. 2023 PGA and Related Dockets
 Incremental Revenue Change by Adjustment Schedule¹⁹
 (Red) indicates negative numbers.

Adjustment Schedule	Description	Gas Cost & Adjustment Schedule Total Revenue at Current Rates	Gas Cost & Adjustment Schedule Total Revenue at Proposed Rates	Total Incremental Change in Revenue	% Change by Rate Schedule	% Contribution to Total Incremental Change
461	Purchase Gas Adjustment	\$59,538,141	\$48,436,125	(\$11,102,016)	(19%)	48%
462	Purchase Gas Cost Amortization	\$5,191,307	(\$5,327,235)	(\$10,518,542)	(203%)	46%
467	COVID Deferred Costs	\$774,970	\$0	(\$774,970)	(100%)	3%
469	Public Purposes	\$3,287,884	\$3,287,884	\$0	0%	0%
475	Decoupling	\$3,382,724	\$129,071	(\$3,253,653)	(96%)	14%
476	Intervenor Funding	\$73,934	\$121,888	\$47,954	65%	(0.2%)
478	Demand Side Management	\$0	\$0	\$0	0%	0%
482	Regulatory Fees Amortization	\$121,710	\$103,029	(\$18,681)	(15%)	0.1%
486	Tax Customer Credit	(\$2,255,487)	(\$2,255,487)	\$0	0%	0%
487	Deferred Tax Credit	(\$769,356)	(\$769,356)	\$0	0%	0%
493	LIRAP	\$243,562	\$2,772,991	\$2,529,429	1039%	(11%)
	Overall	\$69,589,389	\$46,498,910	(\$23,090,479)	(33%)	100%

¹⁹ Values are drawn from tab: "Attach B Rate Schedule Summary" in work papers.

**Attachment C: Avista Corp. 2023-2024 PGA
 Three Percent Test²⁰**

	Surcharge	Rebate
Prior Period Gas Cost Deferral True-Up	\$0	(\$5,327,429)
<u>Non-Gas Cost Amortization</u>		
Intervenor Funding (Advice No. 23-04-G)	\$122,387	\$0
Decoupling (Advice No. 23-03-G)	\$129,071	\$0
Regulatory Fees (Advice No 23-05-G)	\$100,907	\$0
LIRAP (Advice No 23-07-G)	\$565,155	\$0
Subtotal	\$917,520	(\$5,327,429)

Total	(\$9,737,338)
Total Proposed Amortization (Surcharge Less Credits)	(\$4,409,909)
Less intervenor Funding ¹	(\$122,387)
Net Proposed Amortization (subject to the 3% test)	(\$4,532,296)
Utility Gross Revenue 2022 ²	\$177,907,223
3% of Utility Gross Revenue	\$5,337,217
Allowed Amortization	(\$4,532,296)
Allowed Amortization as % of Gross Revenues	0%

²⁰ Values are drawn from Tab: "Attachment C" in work papers with added Covid deferral values from Advice No. 22-02-G.

Attachment D: 2023-2024 PGA

Proposed Rate & Bill Increases for ALL Oregon Local Distribution Companies by Class of Service²¹

		Rate Impacts ²²			
Class of Service	Rate Schedule	Current Rate per Therm	Proposed Rate per Therm	Change Rate per Therm	% Change Rate per Therm
Residential					
Avista	410	\$1.41500	\$1.18470	-\$0.23030	-16.3%
Commercial					
Avista	420	\$1.34489	\$1.12252	-\$0.22237	-16.5%
Industrial					
Avista	424	\$0.84162	\$0.59556	-\$0.24606	-29.2%
Interruptible					
Avista	440	\$0.62352	\$0.41213	-\$0.21139	-33.9%

²¹ Values are drawn from Tab: "Attachment D" in work papers.

²² The residential rates illustrated above do not include pass-through charges included on customer bills that utilities are required to collect and distribute to the appropriate third parties, such as for franchise fees or the Public Purposes Charge.