BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

UG 389

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

8 Staff of the Public Utility Commission of Oregon (Staff) asks the Administrative Law

9 Judge to admit the following pre-filed Staff Exhibits into the record in the above-captioned

10 docket:

11

Exhibit No. **Exhibit** 12 Staff Exhibit 100 Opening Testimony of Marianne Gardner 13 Witness Qualification Statement of Marianne Gardner Staff Exhibit 101 14 Avista Response to Staff Data Request No. 152 Staff Exhibit 102 15 Opening Testimony of Heather B. Cohen Staff Exhibit 200 16 Staff Exhibit 201 Witness Qualification Statement of Heather B. Cohen 17 Avista Response to Staff Data Requests Staff Exhibit 202 18 Oregon Economic & Revenue Forecast, June 2020, All Urban Consumer Staff Exhibit 203 19 Price Index 20 Staff Exhibit 300 Opening Testimony of Bret Farrell 21 Staff Exhibit 301 Witness Qualification Statement of Bret Farrell 22 Staff Exhibit 302 Workpaper Showing Adjustment Calculations for O&M 23 Staff Exhibit 303 Workpaper Showing Adjustment Calculations for A&G 24 Staff Exhibit 304 Workpaper Showing Adjustment Calculations for Atmospheric Testing 25 Staff Exhibit 305 Workpaper Showing Adjustment Calculations for Rate Case Expense 26

Page 1 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 389) JMR//pjr/#10480660

1	Staff Exhibit 306	No Adjustment Summary
2	Staff Exhibit 307	Avista Response to Staff Data Request No. 215
3	Staff Exhibit 400	Opening Testimony of John L. Fox
4	Staff Exhibit 401	Witness Qualification Statement of John L. Fox
5	Staff Exhibit 402	Compare UG 366 and UG 389 Forecasted Plant Additions
6	Staff Exhibit 403	Avista Response to Staff Data Requests
7	Staff Exhibit 500	Opening Testimony of Brian Fjeldheim
8	Staff Exhibit 501	Witness Qualification Statement of Brian Fjeldheim
9 10	Staff Exhibit 502	Gas Storage in Rate Base – Associated Avista workpaper and Responses to Staff Data Requests
11	Staff Exhibit 503	Gas Storage Operating Expense – Associated Avista workpaper and Responses to Staff Data Requests
12	Staff Exhibit 504	Other Gas Supply Expense and Purchased Gas Expense – Associated Avista workpaper and Responses to Staff Data Requests
1314	Staff Exhibit 505	IT Projects – Associated Avista workpaper and Responses to Staff Data Requests
15	Staff Exhibit 506	Other Taxes – Associated Avista workpaper and Responses to Staff Data Requests
16 17	Staff Exhibit 507	Insurance and Risks – Associated Avista workpaper and Responses to Staff Data Requests - <i>Confidential</i>
18 19	Staff Exhibit 508	D&O Insurance – Associated Avista workpaper and Responses to Staff Data Requests - <i>Confidential</i>
20	Staff Exhibit 600	Opening Testimony of Scott Gibbens
21	Staff Exhibit 601	Witness Qualification Statement of Scott Gibbens
22	Staff Exhibit 700	Opening Testimony of Kathy Zarate
23	Staff Exhibit 701	Witness Qualification Statement of Kathy Zarate
24	Staff Exhibit 702	Avista Response to Staff Data Request Nos. 186, 187
25	Staff Exhibit 703	Avista Response to Staff Data Request No. 181

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Page 2 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 389) $_{JMR//pjr/\#10480660}$

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1	Staff Exhibit 704	Avista Response to Staff Data Request No. 189
2	Staff Exhibit 800	Opening Testimony of Sabrinna Soldavini
3	Staff Exhibit 801	Witness Qualification Statement of Sabrinna Soldavini
4	Staff Exhibit 802	Avista Response to Staff Data Requests
5	Staff Exhibit 803	NARUC Cost Allocation Guidelines
6	Staff Exhibit 804	Avista Rule 20
7	Staff Exhibit 900	Opening Testimony of Ming Peng
8	Staff Exhibit 901	Witness Qualification Statement of Ming Peng
9	Staff Exhibit 902	Avista Response to Staff Data Request Nos. 122-132
10	Staff Exhibit 1000	Opening Testimony of Paul Rossow
11	Staff Exhibit 1001	Witness Qualification Statement of Paul Rossow
12	Staff Exhibit 1002	Adjustment Summary - Confidential
13	Staff Exhibit 1100	Opening Testimony of Max St. Brown
14	Staff Exhibit 1101	Witness Qualification Statement of Max St. Brown
15	Staff Exhibit 1102	LRIC-influenced development of Staff's Recommended Rate Spread
16	Staff Exhibit 1200	Opening Testimony of Mitchell Moore
17	Staff Exhibit 1201	Witness Qualification Statement of Mitchell Moore
18	Staff Exhibit 1202	Avista Response to Staff Data Request No. 269
19	Staff Exhibit 1300	Testimony in Support of Partial Settlement of Matt Muldoon, Moya Enright, and Curtis Dlouhy
20	Staff Exhibit 1301	Witness Qualification Statement of Matt Muldoon
21	Staff Exhibit 1302	Witness Qualification Statement of Moya Enright
22	Staff Exhibit 1303	Witness Qualification Statement of Curtis Dlouhy
23	Staff Exhibit 1304	Capital Structure - Confidential
24	Staff Exhibit 1305	Cost of LT Debt Tables and Maturity Profile - Confidential
25	Staff Exhibit 1306	ROE Peer Screening
26		

Page 3 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 389) $_{JMR//pjr/\#10480660}$

1	Staff Exhibit 1307	Long-run Growth Rates
2	Staff Exhibit 1308	BEA Historic GDP Growth
3	Staff Exhibit 1309	TIPS Implied Inflation Expectations
4	This Motion to	o Admit Pre-Filed Staff Exhibits is supported by Declarations of Staff
5	witnesses Heather B.	Cohen, Moya Enright, Curtis Dlouhy, Brian Fjeldheim, Bret Farrell, John
6	L. Fox, Marianne Gar	rdner, Scott Gibbens, Mitchell Moore, Matthew Muldoon, Ming Peng, Paul
7	Rossow, Sabrinna So	ldavini, Max St. Brown, and Kathy Zarate that attest to the truthfulness of
8	their testimony. The	Declarations are attached to this motion.
9	DATED this 2	3 rd day of October 2020.
10		Respectfully submitted,
11		ELLEN F. ROSENBLUM
12		Attorney General
13		/s/ Johanna M. Riemenschneider
14		Johanna M. Riemenschneider, #990083
15		Senior Assistant Attorney General Of Attorneys for Staff of the Public Utility
16		Commission of Oregon
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Page 4 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 389) $_{
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
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3	UG 389
4	In the Matter of
5	AVISTA CORPORATION, dba AVISTA UTILITIES DECLARATION OF
67	Request for a General Rate Revision) HEATHER B. COHEN)
8	
9	I, Heather Cohen, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 200 and Staff Exhibit 201 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17	I hereby declare that the above statement is true to the best of my knowledge and
18	belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
19	
20	SIGNED this 14th day of October 2020.
21	- HEather Cohen
22	HEATHER B. COHEN
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Page 1 - UG 389 - DECLARATION OF HEATHER B. COHEN JLM/pjr/10480674

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2	UG 389	
3	UG 369	
4	In the Matter of)	
5	AVISTA CORPORATION, dba) AVISTA UTILITIES) DECLARATION OF	
6 7	Request for a General Rate Revision) MOYA ENRIGHT)	
8		
9	I, Moya Enright, state the following, under penalty of perjury in the State of Oregon:	
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff	
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.	
12	2. On behalf of Staff, I jointly drafted the pre-filed Staff testimony in support of the	
13	Partial Stipulation submitted for use in this docket as Staff Exhibit 1300 and drafted Staff Exhibit	
14	1302 (witness qualification statement).	
15	3. To the best of my knowledge, my pre-filed testimony and witness qualification	
16	statement are true and accurate.	
17		
18	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.	
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20		
21	SIGNED this <u>16th</u> day of October 2020.	
22	/s/ Moya Enright	
23	MOYA ENRIGHT	
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UG 389 - DECLARATION OF MOYA ENRIGHT $_{\mbox{\scriptsize JLM/pjr}/10480674}$

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2	UG 389	
3	UG 389	
4	In the Matter of)	
5	AVISTA CORPORATION, dba AVISTA UTILITIES DECLARATION OF	
6 7 8	Request for a General Rate Revision) ———————————————————————————————————	
9	I, Curtis Dlouhy, state the following, under penalty of perjury in the State of Oregon:	
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff	
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.	
12	2. On behalf of Staff, I jointly drafted the pre-filed Staff testimony in support of the	
13	Partial Stipulation submitted for use in this docket as Staff Exhibit 1300 and drafted Staff Exhibit	
14	1303 (witness qualification statement).	
15	3. To the best of my knowledge, my pre-filed testimony and witness qualification	
16	statement are true and accurate.	
17		
18	I hereby declare that the above statement is true to the best of my knowledge and	
19	belief, and that I understand it is made for use as evidence in court and is subject penalty for perjury.	
20		
21	SIGNED this _14_ day of October 2020.	
22	Curtis Dlouhy CURTIS DLOUHY	
23	CURTIS DLOUHY	
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JLM/pjr//10480674

Department of Justice 1162 Court Street NE

UG 389 - DECLARATION OF CURTIS DLOUHY

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UG 389 3 4 In the Matter of) 5 AVISTA CORPORATION, dba) AVISTA UTILITIES,) **DECLARATION OF** 6 **BRIAN FJELDHEIM** Request for a General Rate Revision. 7 8 9 I, Brian Fjeldheim, state the following, under penalty of perjury in the State of Oregon: 10 1. I am a Senior Financial Analyst for the Public Utility Commission of Oregon Staff 11 ("Staff"). I work in the Energy Rates, Finance and Audit Division. 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in 12 13 this docket as Staff Exhibit 500 and Staff Exhibit 501 (witness qualification statement). 14 To the best of my knowledge, my pre-filed testimony and witness qualification 15 statement are true and accurate. 16 I hereby declare that the above statement is true to the best of my knowledge and 17 belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury. 18 19 SIGNED this _15th___ day of October 2020. 20 21 /s/ Brian Fjeldheim_ BRIAN FJELDHEIM 22 23 24 25 26

UG 389 – DECLARATION OF BRIAN FJELDHEIM

Page 1 -

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UG 389 3 In the Matter of 4 AVISTA CORPORATION, dba 5 **AVISTA UTILITIES**) DECLARATION OF **BRET FARRELL**) 6 Request for a General Rate Revision 7 8 9 I, Bret Farrell, state the following, under penalty of perjury in the State of Oregon: 10 1. I am a Utility and Energy Analyst 2 for the Public Utility Commission of Oregon 11 Staff ("Staff"). I work in the Universal Service and Regulatory Analysis Division. 12 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in 13 this docket as Staff Exhibit 300 and Staff Exhibit 301 (witness qualification statement). 14 3. To the best of my knowledge, my pre-filed testimony and witness qualification 15 statement are true and accurate. 16 I hereby declare that the above statement is true to the best of my knowledge and 17 belief, and that I understand it is made for use as evidence in court and is subject to 18 penalty for perjury. 19 SIGNED this 22nd day of October 2020. 20 21 22 23 24 25 26

UG 389 - DECLARATION OF BRET FARRELL

Page 1 -

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 389
3	UG 389
4	In the Matter of)
5	AVISTA CORPORATION, dba) AVISTA UTILITIES) DECLARATION OF
6 7	Request for a General Rate Revision) JOHN L. FOX)
8	
9	I, John L. Fox, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Financial Analyst for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 400 and Staff Exhibit 401 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17 18	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.
19	
20	SIGNED this 14th day of October 2020.
21	John Fox
22	JŐHN L. FOX
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Page	1 - UG 389 - DECLARATION JLM/pjr//10480674

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UG 389 3 4 In the Matter of) 5 AVISTA CORPORATION dba) AVISTA UTILITIES,) **DECLARATION OF** 6 MARIANNE GARDNER 7 Request for a General Rate Revision. 8 9 I, Marianne Gardner, state the following, under penalty of perjury in the State of Oregon: 10 1. I am employed by the Public Utility Commission of Oregon Staff ("Staff"). I have 11 most recently worked as the Program Manager in the Energy Rates, Finance and Audit Division. 12 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in 13 this docket as Staff Exhibit 100 and Staff Exhibit 101 (witness qualification statement). 14 3. To the best of my knowledge, my pre-filed testimony is true and accurate. 15 I hereby declare that the above statement is true to the best of my knowledge and 16 belief, and that I understand it is made for use as evidence in court and is subject to 17 penalty for perjury. 18 SIGNED this 15th day of September 2020. 19 20 /s/ Marianne Gardner MARIANNE GARDNER 21 22 23 24 25 26

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UG 389 - DECLARATION OF MARIANNE GARDNER

Page 1 -

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	
3	UG 389
4	In the Matter of
5	AVISTA CORPORATION, dba AVISTA UTILITIES DECLARATION OF
67	Request for a General Rate Revision) SCOTT GIBBENS)
8	
9	I, Scott Gibbens, state the following, under penalty of perjury in the State of Oregon:
10	1. I am a Senior Economist for the Public Utility Commission of Oregon Staff
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 600 and Staff Exhibit 601 (witness qualification statement).
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification
15	statement are true and accurate.
16	
17	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to
18	penalty for perjury.
19	
20	SIGNED this 14th day of October 2020.
21	Scott Gibbens
22	SCOTT ['] GIBBENS
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UG 389 - DECLARATION OF SCOTT GIBBENS
JLM/pjr//10480674

Department of Justice
1162 Court Street NE
Salem, OR 97301-4096
(503) 947-4520 / Fax: (503) 378-3784

1	BEFORE THE PUBLIC UTILITY COMMISSION	
2	OF OREGON	
3	UG 389	
4	To do Matter of	
5	In the Matter of)	
6	AVISTA CORPORATION, dba) AVISTA UTILITIES,) DECLARATION OF	
7) MITCHELL MOORE	
8	Request for a General Rate Revision.)	
9		
10	I, Mitchell Moore, state the following, under penalty of perjury in the State of Oregon:	
11	1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff	
12	("Staff"). I work in the Energy Rates, Finance and Audit Division.	
13	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in	
14	this docket as Staff Exhibit 1200 and Staff Exhibit 1201 (witness qualification statement).	
15	3. To the best of my knowledge, my pre-filed testimony and witness qualification	
16	statement are true and accurate.	
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18	I hereby declare that the above statement is true to the best of my knowledge and	
19	belief, and that I understand it is made for use as evidence in court and is subject penalty for perjury.	
20	remany and response.	
21	SIGNED this 14th day of October 2020.	
22	/s/ Michell Moore	
23	MITCHELL MOORE	
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UG 389 - DECLARATION OF MITCHELL MOORE $_{\rm JLM/pjr}\slash\ JLM/pjr}\slash\ declared$

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UG 389 3 4 In the Matter of) 5 AVISTA CORPORATION, dba) **AVISTA UTILITIES DECLARATION OF**) 6) MATTHEW J. MULDOON 7 Request for a General Rate Revision 8 9 I, Matthew J. Muldoon, state the following, under penalty of perjury in the State of Oregon: 10 1. I am the Economic Analysis Manager for the Public Utility Commission of Oregon 11 Staff ("Staff") in the Energy Rates, Finance and Audit Division. 12 2. On behalf of Staff, I jointly drafted the pre-filed Staff testimony in support of the 13 Partial Stipulation submitted for use in this docket as Staff Exhibit 1300, and Staff Exhibit 1301 14 (witness qualification statement). 15 3. To the best of my knowledge, my pre-filed testimony and witness qualification 16 statement are true and accurate. 17 I hereby declare that the above statement is true to the best of my knowledge and 18 belief, and that I understand it is made for use as evidence in court and is subject to 19 penalty for perjury. 20 SIGNED this 14 day of October 2020. 21 22 Matthew J. Muldoon MATTHEW J. MULDOON 23 24 25 26

UG 389 - DECLARATION OF MATTHEW J. MULDOON

Page 1 -

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 **UG 389** 3 In the Matter of 4 AVISTA CORPORATION, dba 5 **DECLARATION OF AVISTA UTILITIES** MING PENG 6 Request for a General Rate Revision 7 8 9 I, Ming Peng, state the following, under penalty of perjury in the State of Oregon: 10 1. I am a Senior Econometrician for the Public Utility Commission of Oregon Staff 11 ("Staff"). I work in the Energy Rates, Finance and Audit Division. 12 On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in 13 this docket as Staff Exhibit 900 and Staff Exhibit 901 (witness qualification statement). 14 3. To the best of my knowledge, my pre-filed testimony and witness qualification 15 statement are true and accurate. 16 I hereby declare that the above statement is true to the best of my knowledge and 17 belief, and that I understand it is made for use as evidence in court and is subject to 18 penalty for perjury. 19 SIGNED this 4th day of October 2020. 20 22 23 24 25 26

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UG 389 3 4 In the Matter of)) 5 AVISTA CORPORATION, dba) AVISTA UTILITIES,) **DECLARATION OF** 6) PAUL ROSSOW 7 Request for a General Rate Revision. 8 9 I, Paul Rossow, state the following, under penalty of perjury in the State of Oregon: 10 1. I am a Utility Analyst for the Public Utility Commission of Oregon Staff ("Staff"). 11 I work in the Energy Resources and Planning Division. 12 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in 13 this docket as Staff Exhibit 1000 and Staff Exhibit 1001 (witness qualification statement). 14 3. To the best of my knowledge, my pre-filed testimony and witness qualification 15 statement are true and accurate. 16 I hereby declare that the above statement is true to the best of my knowledge and 17 belief, and that I understand it is made for use as evidence in court and is subject to 18 penalty for perjury. 19 SIGNED this 14th day of October 2020. 20 21 Paul Rossow /s/ PAUL ROSSOW 22 23 24 25 26

Department of Justice 1162 Court Street NE Salem, OR 97301-4096

UG 389 - DECLARATION OF PAUL ROSSOW

Page 1 -

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 **UG 389** 3 In the Matter of 4) AVISTA CORPORATION, dba) 5 **AVISTA UTILITIES DECLARATION OF**)) SABRINNA SOLDAVINI 6 Request for a General Rate Revision 7 8 9 I, Sabrinna Soldavini, state the following, under penalty of perjury in the State of Oregon: 10 1. I am a Senior Regulatory Analyst for the Public Utility Commission of Oregon 11 Staff ("Staff"). I work in the Energy Rates, Finance and Audit Division. 12 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in 13 this docket as Staff Exhibit 800 and Staff Exhibit 801 (witness qualification statement). 14 3. To the best of my knowledge, my pre-filed testimony and witness qualification 15 statement are true and accurate. 16 I hereby declare that the above statement is true to the best of my knowledge and 17 belief, and that I understand it is made for use as evidence in court and is subject to 18 penalty for perjury. 19 SIGNED this 14th day of October 2020. 20 21 Sabrinna Soldavini SABRINNA SOLDAVINI 22 23 24 25 26

UG 389 - DECLARATION OF SABRINNA SOLDAVINI

Page 1 -

BEFORE THE PUBLIC UTILITY COMMISSION 1 OF OREGON 2 UG 389 3 4 In the Matter of) 5 AVISTA CORPORATION, dba) **AVISTA UTILITIES**) **DECLARATION OF** 6) MAX ST. BROWN 7 Request for a General Rate Revision 8 9 I, Max St. Brown, state the following, under penalty of perjury in the State of Oregon: 10 1. I am a Senior Utility Analyst for the Public Utility Commission of Oregon Staff 11 ("Staff"). I work in the Energy Resources and Planning Division. 12 2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in 13 this docket as Staff Exhibit 1100 and Staff Exhibit 1101 (witness qualification statement). 14 3. To the best of my knowledge, my pre-filed testimony and witness qualification 15 statement are true and accurate. 16 I hereby declare that the above statement is true to the best of my knowledge and 17 belief, and that I understand it is made for use as evidence in court and is subject to 18 penalty for perjury. 19 SIGNED this _20th___ day of October 2020. 20 21 /s/ Max St. Brown MAX ST. BROWN 22 23 24 25 26

Page 1 - UG 389 - DECLARATION OF MAX ST. BROWN JLM/pjr//10480674

1 2	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
3	UG 389	
4	In the Matter of)	
5678	AVISTA CORPORATION, dba AVISTA UTILITIES DECLARATION OF KATHY ZARATE Request for a General Rate Revision DECLARATION OF KATHY ZARATE	
9	I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:	
10	1. I am a Utility Economist for the Public Utility Commission of Oregon Staff	
11	("Staff"). I work in the Energy Rates, Finance and Audit Division.	
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in	
13	this docket as Staff Exhibit 700 and Staff Exhibit 701 (witness qualification statement).	
14	3. To the best of my knowledge, my pre-filed testimony and witness qualification	
15	statement are true and accurate.	
16 17 18	I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.	
19	SIGNED this _14 day of October 2020.	
20		
21	KATHY ZARATE	
22		
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Page	e 1 - UG 389 - DECLARATION OF KATHY ZARATE JLM/pjr//10480674	

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