

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**
3 **UG 433**

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

MOTION TO ADMIT PRE-FILED
STAFF EXHIBITS

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:

Exhibit No.	Exhibit
Staff Exhibit 100	Opening Testimony of Matt Muldoon
Staff Exhibit 101	Witness Qualification Statement of Matt Muldoon
Staff Exhibit 200	Opening Testimony of John L. Fox
Staff Exhibit 201	Witness Qualification Statement of John L. Fox
Staff Exhibit 202	Compare UG 366, UG 389, UG 433
Staff Exhibit 203	Avista Responses to Staff Data Requests
Staff Exhibit 204	Avista Confidential Responses to Staff Data Requests
Staff Exhibit 300	Opening Testimony of Brian Fjeldheim
Staff Exhibit 301	Witness Qualification Statement of Brian Fjeldheim
Staff Exhibit 302	Responses to Staff Data Requests
Staff Exhibit 400	Opening Testimony of Curtis Dlouhy
Staff Exhibit 401	Witness Qualification Statement of Curtis Dlouhy
Staff Exhibit 402	Non-Confidential Data Responses used in Support of Testimony

1	Staff Exhibit 403	Relevant News
2	Staff Exhibit 404	Confidential Data Responses used in Support of Testimony
3	Staff Exhibit 500	Opening Testimony of Heather Cohen
4	Staff Exhibit 501	Witness Qualification Statement of Heather Cohen
5	Staff Exhibit 502	Avista Responses to Staff Data Requests
6	Staff Exhibit 503	Avista Confidential Responses to Staff Data Requests
7	Staff Exhibit 504	Staff Confidential Workpaper, Wage & Salary
8	Staff Exhibit 505	Staff Confidential Workpaper, D&O Insurance
9	Staff Exhibit 600	Opening Testimony of Michelle Scala
10	Staff Exhibit 601	Witness Qualification Statement of Michelle Scala
11	Staff Exhibit 602	Avista Response to Staff Data Request
12	Staff Exhibit 700	Opening Testimony of Ryan Bain
13	Staff Exhibit 701	Witness Qualification Statement of Ryan Bain
14	Staff Exhibit 702	Forecast to Forecast Change
15	Staff Exhibit 800	Opening Testimony of Madison Bolton
16	Staff Exhibit 801	Witness Qualification Statement of Madison Bolton
17	Staff Exhibit 802	Average Monthly Averages for Materials & Supplies
18	Staff Exhibit 803	Adjustment Analysis for AT Testing
19	Staff Exhibit 804	No adjustment exhibit for Rate Case Expenses
20	Staff Exhibit 805	Avista Response to Staff Data Request
21	Staff Exhibit 900	Opening Testimony of Bret Farrell
22	Staff Exhibit 901	Witness Qualification Statement of Bret Farrell
23	Staff Exhibit 902	Workpaper O&M Adjustment
24	Staff Exhibit 903	Workpaper A&G Adjustment
25	Staff Exhibit 904	Workpaper Maintenance General Plant Adjustment
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1	Staff Exhibit 905	Avista Response to Staff Data Request
2	Staff Exhibit 906	Avista Response to Staff Data Request
3	Staff Exhibit 1000	Opening Testimony of Kathy Zarate
4	Staff Exhibit 1001	Witness Qualification Statement of Kathy Zarate
5	Staff Exhibit 1002	Avista Response to Staff Data Request
6	Staff Exhibit 1100	Opening Testimony of Ming Peng
7	Staff Exhibit 1101	Witness Qualification Statement of Ming Peng
8	Staff Exhibit 1102	Avista Response to Staff Data Request
9	Staff Exhibit 1200	Opening Testimony of Paul Rossow
10	Staff Exhibit 1201	Witness Qualification Statement of Paul Rossow
11	Staff Exhibit 1202	Excerpt from Avista Response to Staff Data Request
12	Staff Exhibit 1300	Opening Testimony of Moya Enright
13	Staff Exhibit 1301	Witness Qualification Statement of Moya Enright
14	Staff Exhibit 1302	Avista Response to Staff Data Request
15	Staff Exhibit 1400	Opening Testimony of Max St. Brown
16	Staff Exhibit 1401	Witness Qualification Statement of Max St. Brown
17	Staff Exhibit 1402	Staff Calculation of Proposed Refund Rate

18 This Motion to Admit Pre-Filed Staff Exhibits is supported by Declarations of Staff
19 witnesses Ryan Bain, Madison Bolton, Heather B. Cohen, Moya Enright, Curtis Dlouhy, Bret
20 Farrell, Brian Fjeldheim, John L. Fox, Matt Muldoon, Ming Peng, Paul Rossow, Max St. Brown,

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1 and Kathy Zarate that attest to the truthfulness of their testimony. The Declarations are attached
2 to this motion.

3 DATED this 19th day of April 2022.

4 Respectfully submitted,

5 ELLEN F. ROSENBLUM
6 Attorney General

7 */s/ Johanna M. Riemenschneider*

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Johanna M. Riemenschneider, OSB No. 990083
9 Senior Assistant Attorney General
10 Of Attorneys for Staff of the Public Utility
Commission of Oregon

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BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Ryan Bain, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I have most recently worked as a Senior Utility Analyst in the Utility Strategy and Integration Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 700 and prepared Staff Exhibit 701 (witness qualification statement) and Staff Exhibit 702 (Forecast to Forecast Change).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.

Ryan Bain

 Ryan Bain

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Madison Bolton, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Utility Analyst in the Utility Strategy and Integration Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 800 and prepared Staff Exhibit 801 (witness qualification statement), Staff Exhibit 802 (Average Monthly Averages for Materials and Supplies), Staff Exhibit 803 (Adjustment Analysis for AT Testing) and Staff Exhibit 804 (Adjustment Exhibit for Rate Case Expenses).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 18th day of April 2022.

Madison Bolton

Madison Bolton

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Heather Cohen, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Utility Analyst in the Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 500 and prepared Staff Exhibit 501 (witness qualification statement), Staff Exhibit 504 (Confidential Workpaper Wage & Salary) and Staff Exhibit 505 (Confidential Workpaper, D&O Insurance).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.

Heather Cohen

Heather Cohen

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Moya Enright, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Economist in the Rates, Finance and Audit Division.
2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1300 and prepared Staff Exhibit 1301 (witness qualification statement).
3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 18th day of April 2022.

M.Enright
Moya Enright

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Curtis Dlouhy, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Economist in the Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 400 and prepared Staff Exhibit 401 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this __15__ day of April 2022.

Curtis Dlouhy

 Curtis Dlouhy

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

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

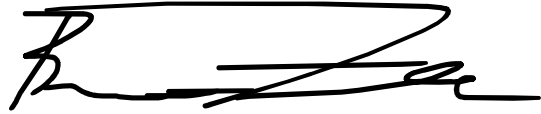
1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Utility and Energy Analyst in the Utility Strategy and Integration Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 900 and prepared Staff Exhibit 901 (witness qualification statement), Staff Exhibit 902 (Workpaper O&M Adjustment), Staff Exhibit 903 (Workpaper A&G Adjustment), and Staff Exhibit 904 (Workpaper Maintenance General Plant Adjustment).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.



Bret Farrell

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

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

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Financial Analyst in the Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 300 and prepared Staff Exhibit 301 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 19th day of April 2022.

/s/ Brian Fjeldheim
Brian Fjeldheim

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

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

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Senior Financial Analyst in the Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 200 and prepared Staff Exhibit 201 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.



John L. Fox

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Matt Muldoon, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Manager in the Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 100 and prepared Staff Exhibit 101 (witness qualification statement). I am also a supporting witness for the joint testimony in support of the Partial Stipulation and Second Stipulation, Exhibits Stipulating Parties/100 and Stipulating Parties/104.

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.



Matt Muldoon

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

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

1. I am employed by the Public Utility Commission of Oregon Staff ("Staff"). I work as a Senior Econometrician (Utility Analyst) in the Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1100 and prepared Staff Exhibit 1101 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.



Ming Peng

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Paul Rossow, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Utility Analyst in the Energy Resources and Planning Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1200 and prepared Staff Exhibit 1201 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.

/s/ Paul Rossow
Paul Rossow

BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON

UG 433

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

I, Kathy Zarate, state the following, under penalty of perjury in the State of Oregon:

1. I am employed by the Public Utility Commission of Oregon Staff (“Staff”). I work as a Utility Economist in the Rates, Finance and Audit Division.

2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in this docket as Staff Exhibit 1000 and prepared Staff Exhibit 1001 (witness qualification statement).

3. To the best of my knowledge, my pre-filed testimony is true and accurate.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

SIGNED this 15th day of April 2022.

Kathy Zarate
Kathy Zarate