1	BEFORE THE PUBLIC	CUTILITY COMMISSION	
2	OF O	REGON	
3	UG 433		
4			
5	In the Matter of	MOTION TO ADMIT PRE-FILED	
J	AVISTA CORPORATION, dba AVISTA	STAFF EXHIBITS	
6	UTILITIES,		
7	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

12	Exhibit No.	Exhibit
13	Staff Exhibit 100	Opening Testimony of Matt Muldoon
14	Staff Exhibit 101	Witness Qualification Statement of Matt Muldoon
15	Staff Exhibit 200	Opening Testimony of John L. Fox
16	Staff Exhibit 201	Witness Qualification Statement of John L. Fox
17	Staff Exhibit 202	Compare UG 366, UG 389, UG 433
18	Staff Exhibit 203	Avista Responses to Staff Data Requests
19	Staff Exhibit 204	Avista Confidential Responses to Staff Data Requests
20	Staff Exhibit 300	Opening Testimony of Brian Fjeldheim
21	Staff Exhibit 301	Witness Qualification Statement of Brian Fjeldheim
22	Staff Exhibit 302	Responses to Staff Data Requests
23	Staff Exhibit 400	Opening Testimony of Curtis Dlouhy
24	Staff Exhibit 401	Witness Qualification Statement of Curtis Dlouhy
25	Staff Exhibit 402	Non-Confidential Data Responses used in Support of Testimony

26

Page 1 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 433) $_{\rm JLM/pjr/\#450524304}$

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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Page 2 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 433) $_{JLM/pjr/\#450524304}$

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

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

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Page 3 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 433) JLM/pjr/#450524304

1	and Kathy Zarate that attest to the truthfulness	s 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
8		Johanna M. Riemenschneider, OSB No. 990083 Senior Assistant Attorney General
9		Of Attorneys for Staff of the Public Utility
10		Commission of Oregon
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Page 4 - MOTION TO ADMIT PRE-FILED STAFF TESTIMONY (UG 433) $_{\rm JLM/pjr/\#450524304}$

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	
3	UG 433
4	In the Matter of)
5	AVISTA CORPORATION dba AVISTA UTILITIES DECLARATION OF RYAN BAIN
6 7 8	Request for a General Rate Revision)
9	I, Ryan Bain, 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 a Senior Utility Analyst in the Utility Strategy and Integration 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 prepared Staff Exhibit 701 (witness qualification statement)
14	and Staff Exhibit 702 (Forecast to Forecast Change).
15	3. To the best of my knowledge, my pre-filed testimony is 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 15 th day of April 2022.
21	Ryan Bain
22	Ryan Bain
23	
24	
25	
26	

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	
3	UG 433
4	In the Matter of)
5	AVISTA CORPORATION dba AVISTA UTILITIES, DECLARATION OF
6 7	Request for a General Rate Revision.) MADISON BOLTON)
8	
9	I, Madison Bolton, 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 work
11	as a Utility Analyst in the Utility Strategy and Integration 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 prepared Staff Exhibit 801 (witness qualification statement),
14	Staff Exhibit 802 (Average Monthly Averages for Materials and Supplies), Staff Exhibit 803
15	(Adjustment Analysis for AT Testing) and Staff Exhibit 804 (Adjustment Exhibit for Rate Case
16	Expenses).
17	3. To the best of my knowledge, my pre-filed testimony is true and accurate.
18	
19	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
20	penalty for perjury.
21	
22	SIGNED this 18th day of April 2022.
23	Madison Bolton
24	Madison Bolton
25	
26	

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2		
3	UG 433	
4	In the Matter of	
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF	
6 7	Request for a General Rate Revision) HEATHER COHEN))	
8		
9	I, Heather Cohen, 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 work	
11	as a Senior Utility Analyst in the 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 500 and prepared Staff Exhibit 501 (witness qualification statement),	
14	Staff Exhibit 504 (Confidential Workpaper Wage & Salary) and Staff Exhibit 505 (Confidential	
15	Workpaper, D&O Insurance).	
16	3. To the best of my knowledge, my pre-filed testimony is 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 to penalty for perjury.	
20		
21	SIGNED this 15th day of April 2022.	
22	Heather Cohen	
23	Heather Cohen	
24		
25		
26		

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2	UG 433	
3		
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 employed by the Public Utility Commission of Oregon Staff ("Staff"). I work	
11	as a Senior Economist in the 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 1300 and prepared Staff Exhibit 1301 (witness qualification statement).	
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.	
15		
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 penalty for perjury.	
18		
19	SIGNED this 18 th day of April 2022.	
20	M.Enright	
21	Moya Enright	
22		
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2		
3	UG 433	
4	In the Matter of)	
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF	
6 7	Request for a General Rate Revision) CURTIS DLOUHY	
8		
9	I, Curtis Dlouhy, 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 work	
11	as a Senior Economist in the 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 prepared Staff Exhibit 401 (witness qualification statement).	
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.	
15		
16	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	
17	penalty for perjury.	
18		
19	SIGNED this15 day of April 2022.	
20	<u>Curtis Dlouhy</u> Curtis Dlouhy	
21	Curus Diouny V	
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON
2	UG 433
3	
4	In the Matter of)
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF
6 7	Request for a General Rate Revision) BRET FARRELL)
8	
9	I, Bret Farrell, 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 work
11	as a Utility and Energy Analyst in the Utility Strategy and Integration Division.
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use in
13	this docket as Staff Exhibit 900 and prepared Staff Exhibit 901 (witness qualification statement),
14	Staff Exhibit 902 (Workpaper O&M Adjustment), Staff Exhibit 903 (Workpaper A&G
15	Adjustment), and Staff Exhibit 904 (Workpaper Maintenance General Plant Adjustment).
16	3. To the best of my knowledge, my pre-filed testimony is 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
19	penalty for perjury.
20	
21	SIGNED this 15th day of April 2022.
22	
23	Bret Farrell
24	
25	
26	

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON	
2		
3	UG 433	
4	In the Matter of)	
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF	
6 7	Request for a General Rate Revision) BRIAN FJELDHEIM)	
8		
9	I, Brian Fjeldheim, 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 work	
11	as a Senior Financial Analyst in the 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 300 and prepared Staff Exhibit 301 (witness qualification statement).	
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.	
15		
16	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	
17	penalty for perjury.	
18		
19	SIGNED this 19 th day of April 2022.	
20	<u>/s/ Brian Fjeldheim</u> Brian Fjeldheim	
21	Ditail I joidheim	
22		
23		
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2				
3	UG 433			
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 employed by the Public Utility Commission of Oregon Staff ("Staff"). I work			
11	as a Senior Financial Analyst in the 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 prepared Staff Exhibit 201 (witness qualification statement).			
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.			
15				
16	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			
17	penalty for perjury.			
18				
19	SIGNED this 15th day of April 2022. John L Fox			
20	John L. Fox			
21	John E. Tox			
22				
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24				
25				
26				

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2				
3	UG 433			
4	In the Matter of)			
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF			
6 7) MATT MULDOON Request for a General Rate Revision)			
8				
9	I, Matt Muldoon, 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 work			
11	as a Manager in the 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 prepared Staff Exhibit 101 (witness qualification statement).			
14	I am also a supporting witness for the joint testimony in support of the Partial Stipulation and			
15	Second Stipulation, Exhibits Stipulating Parties/100 and Stipulating Parties/104.			
16	3. To the best of my knowledge, my pre-filed testimony is 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	SIGNED this 15th day of April 2022			
21	SIGNED this 15th day of April 2022.			
22				
23	Matt Muldoon			
24				
25				
26				

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2	UG 433			
3				
4	In the Matter of)			
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF			
6 7	Request for a General Rate Revision) MING PENG)			
8				
9	I, Ming Peng, 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 work			
11	as a Senior Econometrician (Utility Analyst) in the 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 1100 and prepared Staff Exhibit 1101 (witness qualification statement).			
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.			
15				
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 penalty for perjury.			
18	μ			
19	SIGNED this 15 th day of April 2022.			
20	mmy feuf			
21	Ming Peng (
22				
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1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2				
3	UG 433			
4	In the Matter of)			
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF			
6 7	Request for a General Rate Revision) PAUL ROSSOW)			
8				
9	I, Paul Rossow, 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 wor	rk		
11	as a Utility Analyst in the Energy Resources and Planning Division.			
12	2. On behalf of Staff, I drafted the pre-filed opening testimony submitted for use i	in		
13	this docket as Staff Exhibit 1200 and prepared Staff Exhibit 1201 (witness qualification statement	t).		
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.			
15				
16	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			
17	penalty for perjury.			
18	GYGYYDD 11 1 ath 1 G 1 11 2000			
19	SIGNED this 15 th day of April 2022.			
20	<u>/s/ Paul Rossow</u> Paul Rossow			
21	1 dul Rossow			
22				
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1	BEFORE THE PUBLIC UTILITY COMMISSION			
2	OF OREGON			
3	UG 433			
4	In the Matter of	DECLARATION OF DR. MAX ST. BROWN		
5	AVISTA UTILITY COMPANY,			
6	Request for a General Rate Revision.			
7 8	L. Dr. Max St. Brown, declare under penalty of periury under the laws of the State of Oregon			
9	1. My name is Max St. Brown, I am a Senior Utility Analyst employed in the Utility			
10	Strategy and Integration division at the Public Utility Commission of Oregon.			
11	2. On behalf of Staff, I drafted testimony a	and exhibits for use in this docket, as follows:		
12	Staff/1400 (Opening Testimony) and St	aff/1401 (Witness Qualification Statement).		
13	3. To the best of my knowledge, my testing	nony and my witness qualification statement are		
14	true and accurate.			
15	I hereby declare that the above statements are true to the best of my knowledge and belief,			
16	and I understand it is made for use as evidence before the Public Utility Commission of			
17	Oregon and is subject to penalty for perjury.			
18				
19	SIGNED this 23 rd day of February, 2022 at Salem, Oregon.			
20				
21	Signed:	/s/ Max St. Brown		
22		: Max St. Brown		
23				
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Page 1 - UG 433-DECLARATION OF DR. MAX ST. BROWN

1	BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON			
2				
3	UG 433			
4	In the Matter of)			
5	AVISTA CORPORATION dba) AVISTA UTILITIES) DECLARATION OF			
67	Request for a General Rate Revision) KATHY ZARATE)			
8				
9	I, Kathy Zarate, 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 work			
11	as a Utility Economist in the 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 1000 and prepared Staff Exhibit 1001 (witness qualification statement).			
14	3. To the best of my knowledge, my pre-filed testimony is true and accurate.			
15				
16	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			
17	penalty for perjury.			
18				
19	SIGNED this 15 th day of April 2022.			
20	Kathy Zarate			
21	Kathy Zarate			
22				
23				
24				
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Page 1 - UG 433 - DECLARATION OF KATHY ZARATE