

Avista Corp.
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December 2, 2010

Public Utility Commission of Oregon
Attn: Filing Center
PO Box 2148
Salem, OR 97308-2148

Advice No. 10-06-G

RE: Docket No. UG-201 –Supplemental Direct Testimony of Elizabeth Andrews

Avista Corporation, dba Avista Utilities hereby encloses for filing an original and 26 copies of Supplemental Direct Testimony of Elizabeth M. Andrews (Exhibit No. 1000), Andrews Exhibit No. 1001, and 3 copies of Andrews Revised Workpapers. On September 29, 2010, Avista filed its General Rate Case Filing with the Commission in the above referenced docket. The Company is now supplementing the direct testimony of Elizabeth M. Andrews pertaining to the computation of the Company's revenue requirement. An unopposed Motion for Leave to File Supplemental Direct Testimony and Exhibits is included herewith.

Please direct any questions regarding this filing to Liz Andrews at (509) 495-8601.

Sincerely,

A handwritten signature in cursive script that reads "Kelly Norwood".

Kelly O. Norwood
Vice President, State and Federal Regulation

Enclosure

cc: See attached service list

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

DOCKET NO. UG-201

SUPPLEMENTAL DIRECT TESTIMONY OF ELIZABETH M. ANDREWS
REPRESENTING AVISTA CORPORATION

Revenue Requirement - Supplemental

I. INTRODUCTION

Q. Please state your name, business address, and present position with Avista Corporation.

A. My name is Elizabeth M. Andrews. I am employed by Avista Corporation as Manager of Revenue Requirements in the State and Federal Regulation Department. My business address is 1411 East Mission, Spokane, Washington.

Q. Are you the same Elizabeth M. Andrews who provided prefiled direct testimony in this Docket on behalf of Avista Corporation?

A. Yes, I am.

Q. Could you please explain the purpose of providing this supplemental testimony in this proceeding?

A. Yes. The purpose of my testimony and exhibits is to update the accounting and financial data supporting the Company's justified natural gas revenue requirement for the following adjustments: 1) to adjust the Company's 2009 historical test period results of operations to correct the federal income tax (FIT) amount for an error that came to the Company's attention after the time it filed its original prefiled direct evidence on September 30, 2010; 2) to include the flow through impact on state income tax (SIT), of the FIT correction, in the "SIT-FIT" restating adjustment; and 3) to update the Company's pro forma "Forecast Revenue" adjustment to reflect an update to the Company's forecasted number of customers and customer usage expected for 2011. The net effect of the FIT/SIT correction and updated forecast information increases Avista's revenue requirement from \$5.446 million to \$6.429 million. The Company, however, has not revised its tariff filing to reflect these changes, and accordingly, is

1 not requesting additional rate relief beyond the requested \$5.446 million.

2 My supplemental testimony and exhibit increases the Company's natural gas revenue
3 requirement by \$1.357 million for the FIT correction to the 2009 actual test period results, and
4 by an additional \$192,000 for the corresponding flow through impact to the "SIT-FIT" restating
5 adjustment. However, the Company's natural gas revenue requirement is decreased by \$566,000
6 by including the revised pro forma "Forecast Revenue" adjustment updated to reflect the most-
7 recent forecasted number of customers and customer usage planned for 2011, which was not
8 available at the time of the Company's initial filing. The net impact of these adjustments
9 increases the Company's justified revenue requirement by \$983,000 from that originally filed.

10 Included in the table below is a summary of the adjustments made in this filing, showing
11 the changes from the Company's originally filed revenue requirement.

	<u>Description</u>	<u>Adjustment</u>	<u>Revenue Requirement (millions)</u>
	As filed September 30, 2010		\$5.446
1	Per Results of Operations	Correct federal income tax amount per 2009 results of Oregon operations	\$1.357
2	"SIT-FIT" restating adjustment	Flow through impact on SIT-FIT restating adjustment	\$.192
3	Pro forma "Forecast Revenue" adjustment	Reflects increased number of customers and customer usage expected for 2011	(\$0.566)
	Updated Revenue Requirement		\$6.429

12

13 Q. Are you sponsoring any exhibits to be introduced in this proceeding?

14 A. Yes. I am sponsoring Exhibit No. 1001 (Updated Natural Gas Revenue
15 Requirement), which was prepared under my direction. Exhibit No. 1001 consists of

1 worksheets, which show revised actual 2009 operating results, revised proposed natural gas
2 operating results and rate base for the State of Oregon and the Company's calculation of the
3 revised general revenue requirement. This exhibit also shows the derivation of the net operating
4 income to gross revenue conversion factor and the adjustments to the Company's original
5 prefilled natural gas revenue requirement revised for the restating and pro forma adjustments
6 needed to determine the revised natural gas revenue requirement.

7
8 **II. ADJUSTMENTS TO CORRECT/UPDATE NATURAL GAS REVENUE**
9 **REQUIREMENT**

10 **Q. Please explain the correction to federal and state income taxes included in the**
11 **Company's filing.**

12 **A.** As the Company responded to questions from Commission Staff during the
13 process of this case, it came to the Company's attention that it had excluded an amortization
14 expense when calculating its federal income tax amount included in its 2009 results of operations
15 report. This error has since been corrected within the company's results of operations. However,
16 the impact of this error understated net tax expense included in the Company's filed 2009
17 historical results of operation by approximately \$791,000, and understated its revenue
18 requirement by approximately \$1.36 million. The original filed FIT amount of (\$2.680) million
19 can be seen on Exhibit No. 701, page 1, column b, line 12. The corrected FIT amount of
20 (\$1.889) million can be seen on the supplemental Exhibit No. 1001, page 1, column b, line 12.

21 Net total income tax expense as shown in the Company's original filing (FIT, SIT and
22 deferred FIT) of \$620,000, see Exhibit No. 701, page 1, column b, line 15, was revised to \$1.411

1 million, as shown at Exhibit No. 1001, page 1, column b, line 15; a net change of \$791,000.

2 In addition to this correction, a flow-through impact of this FIT change caused the
3 Company's restated state income tax expense as shown in the "SIT-FIT" restating adjustment to
4 also be understated by approximately \$112,000, or \$192,000 revenue requirement. The "SIT-
5 FIT" restating adjustment has been updated to reflect this flow through impact. The revised
6 "SIT-FIT" restating adjustment can be seen at Exhibit No. 1001, page 5, column i.

7 Revised Andrews workpapers including the corrected Oregon federal income tax
8 calculation worksheet, corrected 2009 "Per Results of Operations" worksheet, and the revised
9 "SIT-FIT" restating adjustment have been provided with this supplemental filing to show the
10 revised calculations of the updated amounts.

11 **Q. Please explain the adjustment to pro forma revenues.**

12 A. The Company's most recent load forecast provides for a slight increase in the
13 number of customers and customer usage expected in 2011 from that included in its original
14 filing. This information was not available at the time of the Company's original filing, but due
15 to its material impact, reducing the Company's demonstrated need for rate relief by
16 approximately \$566,000, the Company has chosen to include this adjustment at this time. The
17 revised pro forma "Forecast Revenue" adjustment can be seen at Exhibit No. 1001, page 5,
18 column F2. Revised workpapers supporting the revised pro forma "Forecast Revenue"
19 adjustment has also been included with this supplemental filing.

20 **Q. Would you please summarize the results of the Company's updated pro**
21 **forma study for the natural gas operating system for the Oregon jurisdiction?**

22 A. Yes. After taking into account 1) the correction to the 2009 actual results

1 of operations FIT; 2) the flow through correction to the "SIT-FIT" restating adjustment, and 3)
2 the revision to the pro forma "Forecast Revenue" adjustment, the pro forma natural gas rate of
3 return ("ROR") for the Company's Oregon jurisdictional operations is 6.09%, (compared to the
4 original filed return of 6.47%). This return level is below the Company's requested rate of return
5 of 8.61%. The revised incremental revenue requirement necessary to give the Company an
6 opportunity to earn its requested ROR is \$6,429,000 for the Company's natural gas operations
7 (an increase of \$983,000 above the original filed amount of \$5,446,000). As I noted earlier,
8 although the demonstrated need for rate relief is \$6.429 million, the Company has not changed
9 its request for rate relief of \$5.446 million in this supplemental filing.

10
11 **Exhibit No. 1001**

12 **Q. Would you please explain what is shown in Exhibit No. 1001?**

13 A. Yes. Exhibit No. 1001 shows the actual and revised pro forma natural gas
14 operating results and rate base for the test period for the State of Oregon. Column (b) of page 1
15 of Exhibit No. 1001 shows revised 2009 operating results and components of the average-of-
16 monthly-average rate base as recorded; column (c) is the total of all adjustments to net operating
17 income and rate base; and column (d) is the revised pro forma results of operations, all under
18 existing rates. Column (e) shows the revenue increase required which would allow the Company
19 to earn an 8.61% rate of return.

20 **Q. Would you please explain page 2 of Exhibit No. 1001?**

21 A. Yes. Page 2 shows the calculation of the \$6,429,000 revised revenue requirement
22 at the requested 8.61% rate of return.

1 **Q. Would you now please explain page 3 of Exhibit No. 1001?**

2 A. Yes. Page 3 shows the derivation of the net operating income to gross revenue
3 conversion factor. The conversion factor takes into account uncollectible accounts receivable,
4 Commission fees and Oregon Excise Tax, which is the Oregon income tax. Federal income
5 taxes are reflected at 35%. The derivation of the conversion factor has not changed from the
6 Company's original filing.

7 **Q. Now turning to pages 4 through 6 of your Exhibit No. 1001, would you please**
8 **explain what those pages show?**

9 A. Yes. Page 4 begins with revised 2009 actual operating results and rate base for
10 the 2009 test period in column (b). Individual normalizing or restating adjustments begin in
11 column (c) on page 4 and continue through column (j) on page 5. Individual pro forma and
12 additional normalizing adjustments begin in column (PF1) on page 5 and continue through
13 column (PF10) on page 6. The final column on page 6 is the total pro forma operating results
14 and rate base for the test period.

15 **Q. Lastly, has there been any other changes included in this exhibit related to**
16 **normalizing or restating adjustments (c) through (j) or Pro Forma adjustments PF1**
17 **through PF10?**

18 A. No. Other than the restating adjustment (i) **SIT-FIT** and the Pro Forma
19 adjustment (F2) **Forecast Revenue** described previously (both shown on page 5 of Exhibit No.
20 1001), all remaining adjustments included on pages 5 through 6 were not revised and are shown
21 as originally filed.

22 **Q. Is the Company proposing to increase its rate increase request (by \$983,000)**

1 **from \$5.446 million to the revised \$6.429 million?**

2 A. No. As explained earlier, the Company is providing supplemental testimony and
3 exhibits in support of a revenue deficiency of \$6.429 million described above; however, the
4 Company has not revised its tariff filing to reflect these changes. Avista simply seeks to provide
5 corrected information, and in the case of pro forma revenues – updated information, that will
6 more accurately reflect Avista's projected natural gas revenue deficiency. Avista has sought to
7 prepare and present its supplemental evidence in a manner that makes it easy for other parties to
8 understand the changes from Avista's prefiled direct evidence. Submission of the supplemental
9 testimony at this time provides the other parties the opportunity to address the corrected
10 information in their responsive testimony.

11 **Q. Does that conclude your prefiled supplemental direct testimony?**

12 A. Yes, it does.

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

DOCKET NO. UG-201

ELIZABETH M. ANDREWS
Exhibit No. 1001

Revenue Requirement - Supplemental

AVISTA UTILITIES
UPDATED NATURAL GAS RESULTS OF OPERATION
OREGON JURISDICTION FORECASTED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2011
(000'S OF DOLLARS)

Line No.	DESCRIPTION	WITH PRESENT RATES			WITH PROPOSED RATES	
		Actual Per Results Report (EOP)	Total Adjustments	Forecasted Total	Proposed Revenues & Related Exp	Forecasted Proposed Total (AMA)
	<i>a</i>	<i>b</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>
OPERATING REVENUES						
1	Total General Business	\$113,472	\$ (16,564)	\$96,908	\$6,429	\$103,337
2	Total Transportation	2,198	325	2,523		2,523
3	Other Revenues	40,811	(40,659)	152		152
4	Total Operating Revenues	156,481	(56,898)	99,583	6,429	106,012
OPERATING EXPENSES						
5	Gas Purchased	118,258	(60,101)	58,157		58,157
6	Operation and Maintenance	12,721	(276)	12,445	35	12,480
7	Administration & General	7,193	(21)	7,172	21	7,193
8	Taxes Other than Income	6,017	(1,596)	4,421	134	4,555
9	Depreciation & Amortization	4,078	1,381	5,459		5,459
10	Total Operating Expenses	148,267	(60,613)	87,654	190	87,844
11	OPERATING INCOME BEFORE FIT	8,214	3,715	11,929	6,239	18,168
INCOME TAXES						
12	Current Federal Income Taxes	(1,889)	1,728	(161)	2,018	1,857
13	Deferred Federal Income Taxes	2,877	(185)	2,692		2,692
14	State Income Taxes	423	(57)	366	474	840
15	Total Income Taxes	1,411	1,486	2,897	2,492	5,389
16	NET OPERATING INCOME	\$6,803	\$2,229	\$9,032	\$3,747	\$12,779
RATE BASE						
17	Utility Plant in Service	242,885	20,906	263,791		263,791
18	Less: Accum Depr and Amort	(89,352)	(7,523)	(96,875)	0	(96,875)
19	Net Utility Plant	153,533	13,383	166,916	0	166,916
20	Accumulated Deferred FIT	(25,385)	(3,820)	(29,205)		(29,205)
21	Inventory and Other	1,997	1,227	3,224	0	3,224
22	Working Capital	0	7,486	7,486	0	7,486
23	TOTAL RATE BASE	\$130,145	\$18,276	\$148,421	\$0	\$148,421
24	RATE OF RETURN	5.23%		6.09%		8.61%

AVISTA UTILITIES
Updated Calculation of General Revenue Requirement
Oregon Natural Gas Jurisdiction
TWELVE MONTHS ENDED DECEMBER 31, 2011

Line No.	Description	(000's of Dollars)
1	Forecasted Rate Base	\$148,421
2	Proposed Rate of Return	8.610%
3	Net Operating Income Requirement	\$12,779
4	Forecasted Net Operating Income	\$9,032
5	Net Operating Income Deficiency	\$3,747
6	Conversion Factor	0.58285
7	Revenue Requirement	\$6,429 Revised
8	Total General Business Revenues	\$99,431
9	Percentage Revenue Increase	6.5%

12/31/2011			
Forecasted			
	Capital	Cost	Weighted
Long Term Debt	49.24%	6.25%	3.08%
Common Equity	50.76%	10.90%	5.53%
Total	100.00%		8.61%

<p>AVISTA UTILITIES Calculation of Conversion Factor Oregon Natural Gas Jurisdiction TWELVE MONTHS ENDED DECEMBER 31, 2011</p>
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Line No.	Description	Factor
1	Revenues	1.000000
	Expense:	
2	Uncollectibles	0.005419
3	Commission Fees	0.002500
4	Energy Resource Supplier Assessment	0.000780
5	Franchise Fees	0.020856
6	Oregon Excise Tax	0.073754
6	Total Expense	<u>0.103309</u>
7	Net Operating Income Before FIT	0.896691
8	Federal Income Tax @ 35.00%	0.313842
9	REVENUE CONVERSION FACTOR	<u>0.582849</u>

AVISTA UTILITIES
UPDATED NATURAL GAS RESULTS OF OPERATION
OREGON FORECASTED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2011
(000'S OF DOLLARS)

Line No.	DESCRIPTION	REVISED	Uncollectible Expense Adj.	Incentive Pay Adj.	Memberships and Dues Adjustment	Miscellaneous Restating Adj.	Franchise Tax Pass Through Elimination
		Per Results of Operations Report					
	a	b	c	d	e	f	g
REVENUES							
1	Total General Business	\$113,472					\$ (1,823)
2	Total Transportation	2,198					(22)
3	Other Revenues	40,811					
4	Total Gas Revenues	156,481	0	0	0	0	(1,845)
EXPENSES							
5	Exploration and Development	0					
	Production						
6	City Gate Purchases	118,258					
7	Purchased Gas Expense	0					
8	Other Gas Expenses	541					
9	Depreciation	0					
10	Taxes	0					
11	Total Production	118,799	0	0	0	0	0
	Underground Storage						
12	Operating Expenses	37					
13	Depreciation	90					
14	Taxes	0					0
15	Total Underground Storage	127	0	0	0	0	0
	Distribution						
16	Operating Expenses	5,830				150	
17	Depreciation	2,352					
18	Taxes	6,017					\$ (1,845)
19	Total Distribution	15,199	0	0	0	150	(1,845)
20	Customer Accounting	3,406	(107)	0	0	0	
21	Customer Service & Information	2,799					
22	Sales Expenses	108					
	Administrative & General						
23	Operating Expenses	7,193		(254)	(23)	32	
24	Depreciation & Amortization	636					
25	Taxes	0					
26	Total Admin. & General	7,829	0	(254)	(23)	32	0
27	Total Gas Expense	148,262	(107)	(254)	(23)	182	(1,845)
28	OPERATING INCOME BEFORE FIT	8,214	107	254	23	(182)	0
FEDERAL INCOME TAX							
29	Current Accrual	(1,889)	35	82	7	(59)	
30	Deferred FIT	2,877					
31	State Income Tax	423	8	19	2	(14)	
32	NET OPERATING INCOME	\$6,803	\$64	\$153	\$14	(\$109)	\$0
RATE BASE: PLANT IN SERVICE							
33	Production Plant	\$8					
34	Underground Storage Plant	4,843					
35	Transmission Plant	0					
36	Distribution Plant	218,233					
37	General Plant	19,801					
38	Total Plant in Service	242,885	0	0	0	0	0
ACCUMULATED DEPRECIATION							
39	Production Plant	0					
40	Underground Storage Plant	119					
41	Transmission Plant	0					
42	Distribution Plant	83,082					
43	General Plant	6,151					
44	Total Accum. Depreciation	89,352	0	0	0	0	0
45	DEFERRED FIT	(25,385)					
46	GAS INVENTORY	1,997					
47	WORKING CAPITAL	0					
48	TOTAL RATE BASE	\$130,145	\$0	\$0	\$0	\$0	\$0
49	RATE OF RETURN	5.23%					

AVISTA UTILITIES
UPDATED NATURAL GAS RESULTS OF OPERATION
OREGON FORECASTED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2011
(000'S OF DOLLARS)

Line No.	DESCRIPTION	REVISED			Restated Total	REVISED			Forecast Property Tax Adjustment
		Remove SB 408 Accrual	SIT - FIT Adjustment	Restate Debt Interest		Forecast Expense Adjustment	Forecast Revenue Adjustment	Forecast Labor & Benefits Adjustment	
		h	i	j	TU	F1	F2	F3	F4
REVENUES									
1	Total General Business	\$2,165			\$113,814		\$ (16,906)		
2	Total Transportation	134	0		2,310		213		
3	Other Revenues				40,811		(40,659)		
4	Total Gas Revenues	2,299	0	0	156,935	0	(57,352)	0	0
EXPENSES									
5	Exploration and Development				0				
Production									
6	City Gate Purchases				118,258		(60,101)		
7	Purchased Gas Expense				0				
8	Other Gas Expenses				541	3		25	
9	Depreciation				0				
10	Taxes				0				
11	Total Production	0	0	0	118,799	3	(60,101)	25	0
Underground Storage									
12	Operating Expenses				37	2			
13	Depreciation				90				
14	Taxes				0				
15	Total Underground Storage	0	0	0	127	2	0	0	0
Distribution									
16	Operating Expenses				5,980	84		320	
17	Depreciation				3,352				
18	Taxes				4,172		(348)		190
19	Total Distribution	0	0	0	13,504	84	(348)	320	190
20	Customer Accounting	0	0	0	3,299	59	(90)	115	0
21	Customer Service & Information				2,799	1	(905)	4	0
22	Sales Expenses				108				0
Administrative & General									
23	Operating Expenses				6,948	157	(55)	159	0
24	Depreciation & Amortization	662	-		1,208				0
25	Taxes				0				14
26	Total Admin. & General	662	0	0	8,246	157	(55)	159	14
27	Total Gas Expense	662	0	0	146,882	306	(61,499)	623	204
28	OPERATING INCOME BEFORE FIT	1,637	0	0	10,053	(306)	4,147	(523)	(204)
FEDERAL INCOME TAX									
29	Current Accrual	\$805	\$390	(138)	(767)	(99)	1,341	(202)	(66)
30	Deferred FIT	(232)	47		2,692				
31	State Income Tax		\$ (163)	(32)	223	(23)	315	(47)	(16)
32	NET OPERATING INCOME	\$1,064	(\$254)	\$170	\$7,905	(\$184)	\$2,491	(\$374)	(\$122)
RATE BASE; PLANT IN SERVICE									
33	Production Plant				\$8				
34	Underground Storage Plant				4,843				
35	Transmission Plant				0				
36	Distribution Plant				218,233				
37	General Plant				19,801				
38	Total Plant in Service	0	0	0	242,885	0	0	0	0
ACCUMULATED DEPRECIATION									
39	Production Plant				0				
40	Underground Storage Plant				119				
41	Transmission Plant				0				
42	Distribution Plant				83,082				
43	General Plant				6,151				
44	Total Accum. Depreciation	0	0	0	89,352	0	0	0	0
45	DEFERRED FIT				(25,385)				
46	GAS INVENTORY				1,997				
47	WORKING CAPITAL				0				
48	TOTAL RATE BASE	\$0	\$0	\$0	\$130,145	\$0	\$0	\$0	\$0
49	RATE OF RETURN				6.07%				

AVISTA UTILITIES
UPDATED NATURAL GAS RESULTS OF OPERATION
OREGON FORECASTED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2011
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Forecast Depreciation Adjustment	Forecast Capital Additions 2010 Adjustment	Forecast Capital Additions 2011 Adjustment	Forecast JP Capital / Inventory Adj.	Restated Salaries and Wages	Forecast Working Capital	Forecasted Total
	a	F5	F6	F7	F8	F9	F10	-
REVENUES								
1	Total General Business							\$96,908
2	Total Transportation							2,523
3	Other Revenues							152
4	Total Gas Revenues	0	0	0	0	0	0	99,583
EXPENSES								
5	Exploration and Development							0
Production								
6	City Gate Purchases							\$8,157
7	Purchased Gas Expense							0
8	Other Gas Expenses							569
9	Depreciation							0
10	Taxes							0
11	Total Production	0	0	0	0	0	0	\$8,726
Underground Storage								
12	Operating Expenses				59			98
13	Depreciation				3			93
14	Taxes				3			3
15	Total Underground Storage	0	0	0	65	0	0	194
Distribution								
16	Operating Expenses					4		6,388
17	Depreciation	96	171	153				3,772
18	Taxes		185	123				4,322
19	Total Distribution	96	356	276	0	4	0	14,482
20	Customer Accounting	0	0	0	0			3,383
21	Customer Service & Information				0			1,899
22	Sales Expenses				0			108
Administrative & General								
23	Operating Expenses				0	(37)		7,172
24	Depreciation & Amortization	(71)	214	153	0			1,594
25	Taxes		46	36	0			96
26	Total Admin. & General	(71)	260	189	0	(37)	0	8,862
27	Total Gas Expense	25	616	465	65	(33)	0	87,654
28	OPERATING INCOME BEFORE FIT	(25)	(616)	(465)	(65)	33	0	11,929
FEDERAL INCOME TAX								
29	Current Accrual	(8)	(199)	(151)	(21)	11		(161)
30	Deferred FIT							2,692
31	State Income Tax	(2)	(47)	(35)	(5)	3		366
32	NET OPERATING INCOME	(\$15)	(\$370)	(\$279)	(\$39)	\$19	\$0	\$9,032
RATE BASE: PLANT IN SERVICE								
33	Production Plant							\$8
34	Underground Storage Plant				\$207			5,050
35	Transmission Plant							0
36	Distribution Plant		\$12,323	\$4,129		(19)		234,666
37	General Plant		\$3,081	\$1,185				24,067
38	Total Plant in Service	0	15,404	\$3,14	207	(19)	0	263,791
ACCUMULATED DEPRECIATION								
39	Production Plant							0
40	Underground Storage Plant				(11)			108
41	Transmission Plant							0
42	Distribution Plant	5,308	73	90				88,553
43	General Plant	1,840	110	113				8,214
44	Total Accum. Depreciation	7,148	183	203	(11)	0	0	96,875
45	DEFERRED FIT	(3,137)	(302)	(369)	(12)			(29,205)
46	GAS INVENTORY				1,227			3,224
47	WORKING CAPITAL						\$7,486	7,486
48	TOTAL RATE BASE	(\$10,285)	\$14,919	\$4,742	\$1,433	(\$19)	\$7,486	\$148,421
49	RATE OF RETURN							6.09%