



DEPARTMENT OF JUSTICE  
GENERAL COUNSEL DIVISION

March 7, 2016

Public Utility Commission of Oregon  
201 High Street SE, Suite 100  
Salem, OR 97301-1166  
[PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Attn: Filing Center

**Re: UG 325 – Errata Filing**

Commission Staff hereby submits the attached errata to the following Staff Opening Testimony:

- Staff/100, Gardner/4: correct table for Staff S-31 adjustment.
- Staff/800, Moore/5: corrections to paragraph beginning on line 7 to correct number and list of Avista's previous rate cases.
- Staff/900, Anderson/16: correct table to reflect adjustment of (\$90,644).

Included with this filing are the updated redacted pages, as appropriate. Confidential materials will be mailed to those parties that have signed the protective order in this docket.

Sincerely,

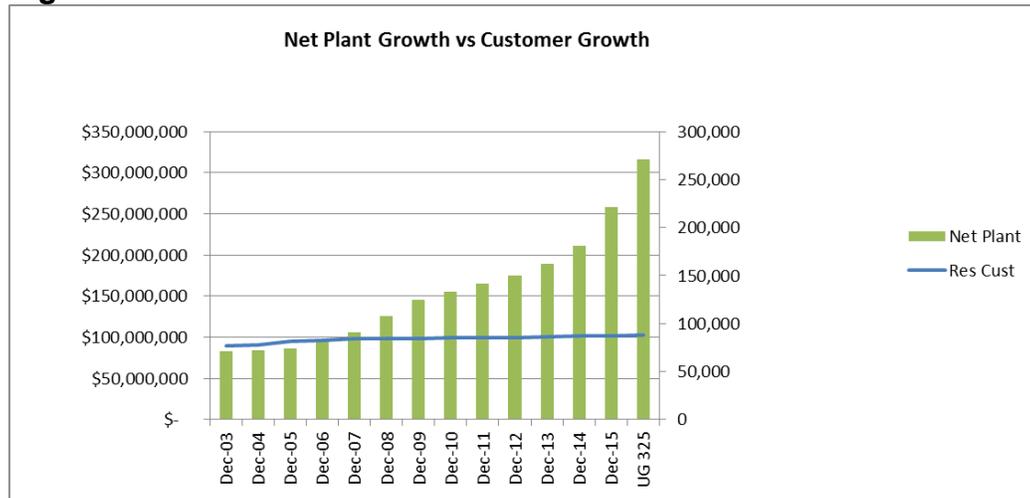
A handwritten signature in black ink, appearing to read "Sommer Moser".

Sommer Moser  
Assistant Attorney General  
Business Activities Section

Opening Testimony Exhibit No.	Staff Witness	Adj. No.	Proposed Staff Adjustments	Revenue Requirement Effect
600	Max St. Brown	S-19	Sales & Transportation Revenues	25
600	Max St. Brown	S-20	DSM-Lost Revenues	-
700	Lance Kaufman	S-21	Information Technology & General Plant	(775)
700	Lance Kaufman	S-22	Cost Allocations /Affiliated Interests	(972)
800	Mitch Moore	S-23	Utility Plant in Service	(925)
800	Mitch Moore	S-24	General Plant Maintenance	-
900	Rose Anderson	S-25	Other Revenues - Misc. Revenue	(94)
900	Rose Anderson	S-26	Atmospheric Testing	(66)
900	Rose Anderson	S-27	Customer Service & Informational Sales Expenses; Advertising; Promotional Activities	(20)
1000	Abdoulaye Barry	S-28	Distribution O&M	(37)
1000	Abdoulaye Barry	S-29	Customer Accounting	(113)
1000	Abdoulaye Barry	S-30	Various A&G; Prepaid Expenses	(4)
1000	Abdoulaye Barry	S-31	Memberships, Dues & Donations	(50)(55)
1000	Abdoulaye Barry	S-32	Meals & Entertainment, Gifts, Travel, Awards	(236)
1100	Scott Gibbens	S-33	Medical Benefits	(238)
1100	Scott Gibbens	S-34	Workforce Levels & FTE; Outside Services	-
1200	Geoff Ihle	S-35	Hedging	-
1300	Phil Boyle	S-36	Fee Free Bankcard	(45)
1400	Kathy Zarate	S-37	Property Sales	-
1400	Kathy Zarate	S-38	Material and Supplies - Non-fuel	(12)
			<b>Total Staff-Proposed Adjustments (Base Rates):</b>	██████
			<b>Staff-Calculated Revenue Requirement Change (Base Rates):</b>	██████

1 A. As noted above, Avista proposes a 22 percent net increase in rate base. As  
 2 was the case in the Company's previous general rate case,<sup>4</sup> this represents a  
 3 dramatic increase over the historical average of rate base growth for the years  
 4 between 2002 and 2013. The historical average of net plant growth in this  
 5 period is 7.75 percent. Figure 1 below shows the long-term rate base growth.

**Figure 1.**



6 *Source: Avista Results of Operations 2003-2015*

7 Since 2007, the Company has filed six general rate cases, seeking rate  
 8 increases that were primarily driven by capital investment: UG 181 (filed  
 9 October 12, 2007); UG 201 (filed September 30, 2010); UG 246 (filed August 15,  
 10 2013); UG 284 (filed September 2, 2014); UG 288 (filed May 1, 2015); UG 325  
 11 (filed November 30, 2016). Figure 2 below illustrates the relative magnitude of net  
 12 plant growth over this period.  
 13

<sup>4</sup> See UG 288 Avista/600, Schuh/9-10.

1 **Q. What is your adjustment (S) number for Other Revenue?**

2 A. S25.

3 **Q. Please provide a summary table showing Other Revenue adjustments.**

4 A. A summary table of Other Revenue Accounts is below.

5

Description/ Account No.	Company Filing		Staff		Adjustment	
	Total Company	OR- Allocated	Total Company	OR- Allocated	Total Company	OR- Allocated
Sales for Resale/ 483XXX		\$0		\$0		\$0
Misc Service Rev/ 488000		\$97,000		\$187,644		(\$90,644)
Gas Property Rent/ 493000		\$1,000		\$1,000		\$0
Other Gas Rev/ 495XXX		\$48,000		\$48,000		\$0

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7  
8  
9  
10  
11

12 **Q. Does this conclude your testimony?**

13 A. Yes.