

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

UM 1356(18), UM 1497(15)

In the Matters of

AVISTA CORPORATION dba AVISTA
UTILITIES,

Request for Reauthorization to Defer
Certain Costs Related to Intervenor
Funding Grants (UM 1356(18)); and

Request for Reauthorization to Defer
Purchased Gas Costs Differences
(UM 1497(15)).

ORDER

DISPOSITION: STAFF'S RECOMMENDATION ADOPTED

At its Special Public Meeting on October 28, 2025, the Public Utility Commission of Oregon adopted Staff's recommendation in this matter. The Staff Report with the recommendation is attached as Appendix A.

BY THE COMMISSION:



Alison Lackey

Chief Administrative Law Judge



A party may request rehearing or reconsideration of this order under ORS 756.561. A request for rehearing or reconsideration must be filed with the Commission within 60 days of the date of service of this order. The request must comply with the requirements in OAR 860-001-0720. A copy of the request must also be served on each party to the proceedings as provided in OAR 860-001-0180(2). A party may appeal this order by filing a petition for review with the Circuit Court for Marion County in compliance with ORS 183.484.

ITEM NO. CA1

**PUBLIC UTILITY COMMISSION OF OREGON
STAFF REPORT
SPECIAL PUBLIC MEETING DATE: October 28, 2025**

REGULAR _____ **CONSENT** X **EFFECTIVE DATE** October 31, 2025

DATE: October 16, 2025

TO: Public Utility Commission

FROM: Julie Dyck

THROUGH: Anna Kim and Scott Gibbens **SIGNED**

SUBJECT: AVISTA UTILITIES:
(Docket Nos. ADV 1752/Advice No. 25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15))
Consolidated Staff Memo – Non-Gas Dockets Accompanying 2025 Purchased Gas Adjustment Filings.

STAFF RECOMMENDATION:

Staff recommends the Commission approve Avista Corporation dba Avista Utilities' (Avista, AVA, or Company) Advice Nos. 25-03-G, 25-04-G, 25-05-G, 25-06-G, and 25-08-G for service rendered on and after October 31, 2025, and approve the Company's requests to reauthorize deferrals in Docket Nos. UM 1497(15) and UM 1356(18).

DISCUSSION:

Purpose

The purpose of this memo is to provide the Commission with a consolidated summary of the non-commodity cost rate changes that are typically filed in conjunction with the annual Purchased Gas Adjustment (PGA) of Avista.¹ Each year, the utilities file annual updates to their PGA tariffs to reflect updated projected cost of natural gas and a true-up of actual gas costs from the previous year. In addition, utilities submit related non-gas dockets addressing cost recovery for programs and initiatives that are ongoing. This

¹ This is a new process that is implemented for the first time in 2025 in order to reduce regulatory burden and condense postings where possible.

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)

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memo compiles Staff's review and recommendations on a majority of those non-commodity cost matter for Avista.

Issue

Whether the Public Utility Commission of Oregon (Commission) should approve Avista's 2025 annual PGA non-gas Advice Filings updating multiple rate schedules and approve two requests to reauthorize deferrals.

Applicable Rule or Law

ORS 757.205 requires public utilities to file all rates, tolls, and charges with the Commission. ORS 757.210 provides that the Commission may approve tariff changes if they are fair, just, and reasonable. Filings that make any change in rates, tolls, charges, rules, or regulations must be filed with the Commission at least 30 days before the effective date of the changes.

ORS 757.259(5) states that unless subject to an automatic adjustment clause, amounts deferred under ORS 757.259 shall be allowed in rates only to the extent authorized by the Commission in a proceeding under ORS 757.210 to change rates and upon review of the utility's earnings at the time of application to amortize the deferral. The Commission may require that amortization of deferred amounts be subject to refund. The Commission's final determination on the amount of deferrals allowable in the rates of the utility is subject to a finding by the Commission that the amount was prudently incurred by the utility.

ORS 757.259(6) states that the overall average rate impact of the amortizations authorized under this section in any one year may not exceed three percent of the utility's gross revenues for the preceding calendar year. ORS 757.259(7) allows the Commission to consider an overall average rate impact greater than that specified in subsection (6) for natural gas commodity and pipeline transportation costs incurred by a natural gas utility, if the Commission finds that allowing a higher amortization rate is reasonable under the circumstances.

OAR 860-022-0025 requires that revised tariff filings include statements showing the change in rates, the number of customers affected and resulting change in annual revenue, and the reasons for the tariff revision.

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)

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OAR 860-022-0030 requires that tariff filings which result in increased rates include statements showing the number of customers affected, the annual revenue under existing schedules, the annual revenue under proposed schedules, the average monthly bills under existing and proposed schedules, and the reasons supporting the proposed tariff.

The PGA mechanism was originally established by Order No. 89-1046 to minimize the frequency of gas cost-related rate changes and the fluctuation of rate levels pursuant to ORS 757.259(2)(e). Since the mechanism's creation in 1989, the Commission has issued a series of orders concerning PGA filings through Docket No. UM 1286.² Order Nos. 18-144 and 25-308 are the most recent of these orders. This order revises the Commission's Natural Gas Portfolio Development Guidelines adopted in Docket No. UM 1286 by adding language concerning review and approval of long-term hedging instruments in a local distribution company's (LDC) natural gas portfolio. No changes were made to the PGA Filing Guidelines previously established in Order No. 14-238. The Company's PGA filing is included in a separate Staff memo.

On December 16, 2021, the Department of Environmental Quality (DEQ) adopted the Oregon Climate Protection Program (CPP) rules, which set a cap on greenhouse gas emissions from transportation fuels and natural gas. These rules were invalidated in December 2023 by the Oregon Court of Appeals following challenges by multiple parties. The DEQ adopted a revised CPP on November 21, 2024. The first compliance period started Jan. 1, 2025 and covers emissions through the end of 2027. The Company's CPP filing is included in a separate Staff memo.

Analysis

This section covers the winter rate moratorium that impacted all PGA filings, provides a summary table of the filings included in this memo, and provides a brief section covering Staff's analysis of each of the filings.

The passage of House Bill (HB) 3179 specifies that "[a]ny increase in residential rates may not take effect from November 1 to March 31."³ On August 11, 2025, Staff of the

² Order No. 08-504 established the form of the PGA Mechanism. PGA Guidelines were acknowledged by the Commission in Docket No. UM 1286, Order No. 09-248, on June 23, 2009. The Guidelines in Docket No. UM 1286 have been modified four different times since they were first acknowledged by the Commission, in Order No. 10-197, in Order No. 11-196, in Order No. 14-238, and in Order No. 18-144.

³ Section 3(7) HB 3179.

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)

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Public Utility Commission of Oregon filed a motion to amend the previously effective date of November 1 to October 31 in the PGA Guidelines as adopted in Order No. 14-238. The Chief Administrative Law Judge issued Order No. 25-308 granting the motion.

The following is a list of the tariff updates analyzed in this memorandum. The tariffs amortize amounts deferred under ORS 757.259(2)(e) and (3). Amounts deferred under these sections may only be amortized into rates after a prudence review and review of the Company's earnings for a period that is representative of the deferral period, unless the updates are part of an automatic adjustment clause (AAC). If part of an AAC, the earnings review is discretionary. Staff reviewed the prudence of the costs at issue and Avista's earnings for calendar year 2024. Staff did not find the amounts subject to review were imprudent or that amortization of the deferrals at issue is inappropriate in light of Avista's earnings during the deferral period. Staff will address each of the tariff updates separately below.

The impact of the filings included in this consolidated memo is an increase of \$6,777,003 in revenue and a 4.69 percent increase compared to 2024 gross revenue. This does not include the impacts from the Company's ADV 1756 filing; this filing and its associated impact is included in a separate Staff memo.

Table 1: Avista Summary Table

Docket Number	Advice No.	Issue	Type	Proposed Residential Rate % Change	Staff Recommendation
ADV 1752	25-03-G	OR Decoupling	Tariff Change	4.78%	Approve
ADV 1753	25-04-G	Intervenor Funding	Amortization	0.07%	Approve
ADV 1754	25-05-G	OR Regulatory Fees	Tariff Change	-0.01%	Approve
ADV 1755	25-06-G	LIRAP (Rate Discount)	Tariff Change	-1.4%	Approve
ADV 1757	25-08-G	COVID Deferred Costs	Amortization	0.3%	Approve

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)

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UM 1356(18)	N/A	Defer Intervenor Funding	Deferral	N/A	Approve
UM 1497(15)	N/A	Defer PGA	Deferral	N/A	Approve

ADV 1752

Summary of Filing:

This filing is the “Natural Gas Decoupling Rate Adjustment.” The Commission approved a natural gas decoupling mechanism for Avista beginning in 2016. The decoupling mechanism allows the Company to: 1) defer the difference between actual decoupling related revenue received from customers through volumetric rates, and the decoupling-related revenue approved for recovery in the Company’s last general rate case on a per customer basis; and 2) file a tariff to surcharge or rebate, by rate group, the total deferred amount accumulated in the deferred revenue accounts for the prior January through December time period.

The Commission authorized deferral of the 2024 decoupling variance in Order No. 24-225 (UM 1753(8)). Avista’s Advice Filing updates the rate in Schedule 475, Decoupling Mechanism to amortize the balance over the period October 31, 2025 to October 30, 2026.

Background:

The following components are included in the Company’s requested surcharge: 2024 deferred revenue, prior year residential residual/carryover balance, interest through October 30, 2026, revenue related expense adjustment, customer surcharge revenue, and carryover deferred revenue.

Key Facts:

For the Residential Group, the Company recorded \$4,048,140 in the surcharge direction in deferred revenue in 2024. The proposed rate of 4.459 cents per therm is designed to recover \$2,368,978 from residential customers served under rate Schedules 410 (Residential) and 411 (Multi-family Residential). As part of the Decoupling Mechanism, the Company is required to track how much of the decoupling deferral is related to weather. Weather accounted for \$2,002,349 of the \$4,048,140 for residential customers. The decoupling deferral is not subject to an earnings review or a sharing test. Decoupling rate adjustment surcharges are subject to a 3 percent annual rate increase limitation. Both the Residential and Non-Residential customer groups exceeded the 3 percent rate increase limitation in 2024. The Residential customer rate

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)

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was adjusted from 5.52 percent to 3.0 percent, and the Non-Residential customer rate was adjusted from 3.51 percent to 3.0 percent.

Correction:

Staff met with the Company and noted the residential deferral summary and table included the word “rebate” rather than “surcharge” in its original filing. This was merely a typo in the cover letter and does not impact the proposed tariff rate.

Customer Impact:

107,839 customers are impacted. For Schedules 410/411, an average customer’s bill is expected to increase from \$68.43 to \$68.50. For Schedule 420 (General Natural Gas Service), an average customer bill is expected to increase from \$262.48 to \$262.81. For Schedule 424 (Large General and Industrial), an average customer bill is expected to increase from \$2,164.33 to \$2,171.46. For Schedule 440 (Interruptible-Large Commercial and Industrial), an average customer bill is expected to decrease from \$11,396.85 to \$10,138.38. For Schedule 444 (Seasonal), an average customer bill is expected to increase from \$4,140.10 to \$4,153.21.

ADV 1753

Summary of Filing:

The purpose of this filing is to amortize amounts deferred under Docket No. UM 1356(17) for intervenor funding.

Background:

An Intervenor Funding Agreement (IFA) governs intervenor funding grants for organizations representing customer interests in Commission proceedings.⁴ Energy utilities pay into the IFA funds. The IFA sets forth eligibility criteria, regulatory procedures, and payment issuance and review. Expenses included for amortization in Docket No. ADV 1753 were deferred by the Company during the 12-month period ending June 30, 2025. Use of intervenor funding grants for this deferral period are in accordance with the Fifth Amended and Restated Intervenor Funding Agreement, approved by the Commission in Order No. 22-506, and a separate intervenor funding agreement specific to environmental justice and low-income advocate organizations, approved in Order No. 23-033. The Commission most recently approved deferral of Avista’s intervenor funding costs in Docket No. UM 1356(17), Order No. 24-372, for the 12 months beginning November 1, 2024.

⁴ Intervenor funding grants include the CUB Fund, Preauthorized Matching Fund, Issues Fund, and HB 2475 Fund.

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Key Facts:

The net effect of the new temporary adjustment for intervenor funding, proposed to go into effect October 31, 2025, will result in an increase in the Company's annual revenues of \$59,728. Per ORS 757.259(4), the amortization of Intervenor Funding is not subject to an earnings review, and the Intervenor Funding amortization balance is not included in the three percent test.

Customer Impact:

95,791 customers are impacted. For Schedule 410/411, an average customer bill will increase from \$68.43 to \$68.48. For Schedule 439/440 (Interruptible—Consumer-Owned and Large Industrial and Commercial Service), an average customer bill will decrease from \$11,396.85 to \$11,391. For Schedule 456 (Interruptible—Consumer-Owned Large Industrial and Commercial), an average customer bill will decrease from \$234,785.58 to \$234,421.33.

ADV 1754

Summary of Filing:

The purpose of this filing is to request amortization of amounts deferred in UM 2053(5). The requested amortization is the difference between the 0.43 percent collected in base rates under Docket No. UG 461, and the current rate of 0.45 percent approved in UM 1012, plus the forecasted surplus balance.

Background:

Pursuant to ORS 756.310 and OAR 860-021-0034, as a gas utility, Avista must pay the Commission a regulatory fee each year by April 1. The fee is determined by the Commission and assessed as a percentage of the utility's gross operating revenues attributable to Oregon. The rate is set annually, by March 1, in Docket No. UM 1012. In 2024, per Order No. 24-054, the annual fee was set at 0.45 percent of 2023 gross operating revenues. This rate was adopted at 0.45 percent, effective March 1, 2025, in Order No. 25-069.⁵ The Company submits an annual filing to defer costs associated with incremental changes in the annual regulatory fee. The Commission most recently reauthorized the deferral application in Docket No. UM 2053(5), Order No. 25-122.

⁵ In 2020, per Order No. 20-054, the Commission approved a rate of 0.35 percent. That rate was increased in 2021, per Order No. 21-066 to 0.375 percent and again in 2022, per Order No. 22-062, to 0.43 percent. This rate was increased to 0.45 percent, effective March 1, 2024, in Order No. 24-054.

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)

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Key Facts:

The effect of applying the new temporary rate adjustments is to decrease the Company's annual revenues by \$13,000, or about 0.01 percent. The amounts sought for recovery represent an equal-percentage-of-revenue basis. Pursuant to ORS 757.259(6), this filing does not impose a rate increase greater than three percent of Avista's gross revenues. An earnings review was not performed, other than the annual earnings review conducted each spring, as the Commission regulatory fee is not subject to sharing.⁶

Customer Impact:

107,355 customers are impacted. For Schedule 410/411, an average customer bill will decrease from \$68.43 to \$68.42. For Schedule 420, an average customer bill will decrease from \$262.48 to \$262.45. For Schedule 424, an average bill will decrease from \$2,164.33 to \$2,163.79.

ADV 1755

Summary of Filing:

The purpose of this filing is an update to the rates contained within Schedule 493, the Company's Residential Low-Income Rate Assistance (LIRAP) tariff.

Background:

Avista's LIRAP was originally approved by the Commission in 2002. As a result of the passage of HB 2475 in 2022, the Company transitioned its formerly grant-based LIRAP into a jointly-administered income-based discount model ("My Energy Discount", or MED), with complementary arrearage assistance options ("Arrearage Management Plan" (AMP) and Arrearage Forgiveness), to better serve the specific energy burden of the households it serves. Avista deferred all costs associated with offering differential rates to qualifying customers pursuant to HB 2475 (Docket No. UM 2232). In 2023, the Company then requested to amortize these costs via Avista's Schedule 493—which provides the revenues to support the program through a natural gas surcharge—so that all costs borne by LIRAP go through the Company's Schedule 493 LIRAP tariff.

The Company's current Schedule 493 LIRAP deferral, most recently authorized by Order No. 25-123 in Docket No. UM 1978, records the funds collected through Schedule 493, netted with the costs of LIRAP, in a balancing account, with any adjustments needed requested in July of each year along with the Company's annual Purchased Gas Adjustment (PGA) filings. Interest accrues on this balancing account

⁶ It is a fee that each public utility must pay pursuant to ORS 756.310 and OAR 860-021-0034.

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)
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each month based on the average monthly fund balance at the Modified Blended Treasury (MBT) rate.

Key Facts:

Through this filing, the Company is requesting a decrease in overall retail revenues of approximately \$1.7 million, or 1.3 percent. The dollars were calculated through Schedule 493, the LIRAP deferral, which has a surcharge balance of \$395,616, and the LIRAP program is forecasted to need \$3.1-\$3.2 million. The docket does use the three percent annual rate impact test. Total gross revenue for calendar year 2024 was \$144,378,437, and total amortizations resulting from this filing, which is deemed to be the net deferral balance as of June 30, 2025, is \$408,766.

Customer Impact:

197,868 customers are impacted. For Schedule 410/411, an average customer bill is expected to decrease by 1.4 percent. For Schedule 420, an average customer bill is expected to decrease by 1.3 percent. For Schedule 424/425, an average customer bill is expected to decrease by .8 percent. For Schedule 439/440, an average customer bill is expected to decrease by 1.1 percent. For Schedule 444, an average customer bill is expected to decrease by .8 percent. For Schedule 456, there is no proposed change in revenues.

ADV 1757

Summary of Filing:

The purpose of this filing is to change the expiration of a temporary rebate related to the amortization of COVID-19 deferred costs from October 31, 2025 to October 30, 2025, to align with the effective date of the Company's other annual PGA tariff updates, which is October 31, 2025.

Background:

Order No. 24-371 authorized the amortization of the residual balance, entered October 31, 2024, in Docket No. 500. The Staff report⁷ provides a breakdown of the COVID-19-related costs that were recovered by the Company, as well as the \$199,000 rebate the Company is amortizing.

Key Facts:

As mentioned, this is about the expiration of a temporary rebate. Through June 30, 2025, the Company had amortized approximately \$160,000 of the \$199,000 deferred

⁷ CA5 - UG 500.

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)
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rebate back to customers and expects the rebate balance to be less than \$10,000⁸ by the expiration date. Avista states it will handle the residual balance in a future general rate case or other proceeding as stated in the tariff.

Customer Impact:

95,714 customers are impacted. For Schedule 410/411, an average customer bill is expected to increase from \$68.43 to \$68.60.

UM 1356(18)

Summary of Filing:

The purpose of this filing is to reauthorize the Company to record and defer costs related to intervenor funding grants for the 12-month period beginning November 1, 2025.

Background:

The Commission approved an Intervenor Funding Agreement between the Company and Interveners in Order No. 07-487, and has periodically approved updated IFAs, including the last approval on February 8, 2023, in Order No. 23-033 in Docket No. UM 2211. The deferral was most recently approved on October 31, 2024, in Order No. 24-372 in Docket No. UM 1356(18). Avista asks the Commission for an order reauthorizing it to utilize deferred accounting for Intervenor Funding Grants provided to various qualifying organizations. The intervenor Funding Agreement provides that pre-certified intervenors must submit a proposed fund budget to the Commission. The Interim Agreement also provides that eligible recipients must submit a proposed budget to the Commission

Key Facts:

The Company proposes the same account from 2024 through 2025, for this year 2025 through 2026, sub-accounts of FERC Account No. 191, are used to record the grant payments, specifically Account Nos. 191725, 191720, 191721, and 191722. Avista's annual PGA filing includes a request to recover the current deferral balances and the remaining unamortized residual balances, over the upcoming traditional PGA period, October 31, 2025 – October 30, 2026. Effective October 31, 2025, balances for the residential and Industrial are estimated to be \$6,415 for residential and \$(2,022) for Industrial. Pursuant to ORS 757.259(4) and Commission Order No. 18-017, Appendix A, page 28, paragraph 7.9, these costs are exempt from the amortization caps and earnings test. For amortization, the prudence review should be limited to verification of

⁸ This is a negative value, a rebate to customers.

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the accounting methodology used to determine the final amortization balance. This deferral is not subject to a sharing mechanism.

UM 1497(15)

Summary of Filing:

The purpose of this filing is to evaluate Avista's application for reauthorization to defer purchased natural gas cost differences associated with the PGA mechanism for the 12-month period beginning November 1, 2025.

Background:

The PGA mechanism allows utilities to regularly adjust the price of gas charged to customers to reflect the utility's costs to purchase and transport the gas. The monthly differences arise because utilities calculate the rates associated with gas costs using forecasted gas prices and therm usage. The Sub-account 191909 tracks the commodity segment of these cost differences, while Account 191910 monitors the demand segment. Once the Commission confirms that these costs were appropriately incurred, these differences are part of the Company's yearly PGA submission for either refunds or surcharges to customers.

Avista files an annual request to amortize the accumulated deferral, with amortization this year to begin October 31. Additionally, the Company provides the calendar year regulated utility earnings, for ratemaking purposes, which is representative of the period when the deferral activity and dollar totals took place. On an annual basis, the Company files its Oregon Division Results of Operations report to satisfy the reporting requirements associated with Docket No. UM 903 (associated Order No. 99-272, and Order No. 99-284) as well as the standard Oregon annual reporting requirements.

Key Facts:

The Company proposes to defer differences in Purchased Gas Cost in two sub-accounts within FERC Account Number 191 (191909 and/or 191910). Due to the variable pricing of natural gas that is bought and delivered for consumers, determining related costs is challenging to do with certainty. This variability highlights the necessity of using deferred accounting. As of June 30, 2025, the remaining amounts for the deferral and amortization accounts are: \$(16,087,564) for Commodity Deferrals, \$1,964,262 for Demand Deferrals, \$(1,518,070) for Prior Commodity Amortization, and \$378,513 for Prior Demand Amortization. Prior to amortization, a spring earnings review and prudence review will be conducted. The Company will defer 90 percent of the difference between actual commodity costs and the commodity costs collected from customers. 100 percent of the demand portion will be deferred. This deferral is subject

Docket Nos. ADV 1752/Advice No.25-03-G, ADV 1753/Advice No. 25-04-G, ADV 1754/Advice No. 25-05-G, ADV 1755/Advice No. 25-06-G, ADV 1757/Advice No. 25-08-G, UM 1356(18), and UM 1497(15)
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to the exception at ORS 757.259(7) that allows the Commission to consider an overall average rate impact greater than that specified in subsection (6) for natural gas commodity and pipeline transportation costs incurred by a natural gas utility, if the Commission finds that allowing a higher amortization rate is reasonable under the circumstances.

Conclusion

Staff has reviewed the non-gas filings accompanying the 2025 Purchased Gas Adjustments for Avista. Staff finds the filings to be consistent with Commission policy and prior practice, with the specific recommendations outlined above. Staff requests Commission approval of the recommendations provided in this memo.

Avista has reviewed this memo.

PROPOSED COMMISSION MOTION:

Approve Avista's Advice Nos. 25-03-G, 25-04-G, 25-05-G, 25-06-G, and 25-08-G, which update the Company's tariff sheets, for service rendered on and after October 31, 2025, and approve the Company's requests to re-authorize deferrals in Docket Nos. 1356(18) and UM 1497(15).