DAVID J. MEYER
VICE PRESIDENT AND CHIEF COUNSEL FOR
REGULATORY & GOVERNMENTAL AFFAIRS
AVISTA CORPORATION
P.O. BOX 3727
1411 EAST MISSION AVENUE
SPOKANE, WASHINGTON 99220-3727
TELEPHONE: (509) 495-4316
FACSIMILE: (509) 495-8851
DAVID.MEYER@AVISTACORP.COM

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF AVISTA CORPORATION FOR THE AUTHORITY TO INCREASE ITS RATES AND CHARGES FOR ELECTRIC AND NATURAL GAS SERVICE TO ELECTRIC AND NATURAL GAS CUSTOMERS IN THE STATE OF IDAHO	CASE NO. AVU-E-15-05 CASE NO. AVU-G-15-01 DIRECT TESTIMONY OF MARK T. THIES

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

I. INTRODUCTION

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

A. My name is Mark T. Thies. My business address is 1411 East Mission Avenue, Spokane, Washington. I am employed by Avista Corporation as Senior Vice President, Chief Financial Officer, and Treasurer.

Q. Would you please describe your education and business experience?

A. I received a Bachelor of Arts degree in 1986, with majors in Accounting and Business Administration from Saint Ambrose College in Davenport, Iowa, and became a Certified Public Accountant in 1987. I have extensive experience in finance, risk management, accounting and administration within the utility sector.

I joined Avista in September of 2008 as Senior Vice President and Chief Financial Officer ("CFO"). Prior to joining Avista, I was Executive Vice President and CFO for Black Hills Corporation, a diversified energy company, providing regulated electric and natural gas service to areas of South Dakota, Wyoming and Montana. I joined Black Hills Corporation in 1997 upon leaving InterCoast Energy Company in Des Moines, Iowa, where I was the manager of accounting.

Previous to that I was a senior auditor for Arthur Anderson & Co. in Chicago, Illinois.

Q. What is the scope of your testimony in this proceeding?

A. I will provide a financial overview of Avista Corporation as well as explain the proposed capital structure, overall rate of return, and our credit ratings. Additionally, I will summarize our capital expenditures program. Mr. Adrien McKenzie, on behalf of Avista, will provide additional testimony related to the appropriate capital structure and return on equity for Avista, based on our specific circumstances, together with the current state of the financial markets.

In brief, I will provide information that shows:

- Avista's plans call for making significant utility capital investments in our electric and natural gas systems to preserve and enhance service reliability for our customers, including the continued replacement of aging infrastructure. Capital expenditures of $1.08 billion are planned for 2015-2017. Capital expenditures of approximately $1.8 billion are planned for the five-year period ending December 31, 2019. Avista needs adequate cash flow from operations to fund these requirements, together with access to capital from external sources under reasonable terms, on a sustainable basis.

- We are proposing an overall rate of return of 7.62 percent, which includes a 50.0 percent common equity ratio, a 9.9 percent return on equity, and a cost of debt of 5.34 percent. We believe our proposed overall rate of return of 7.62 percent and proposed capital structure provide a reasonable balance between safety and economy.

- Avista’s corporate credit rating from Standard & Poor’s is currently BBB and Baa1 from Moody’s Investors Service. Avista must operate at a level that will support a solid investment grade corporate credit rating in order to access capital markets at reasonable rates. A supportive regulatory environment is an important consideration by the rating agencies when reviewing Avista. Maintaining solid credit metrics and credit ratings will also help support a stock price necessary to issue equity under reasonable terms to fund capital requirements.

- Avista completed two significant business unit transactions in 2014: the sale of Ecova and the acquisition of Alaska Electric Light and Power utility operations. These transactions are supportive to our business profile and their financial impacts have positively complemented our ongoing financial structure and operations.

A table of contents for my testimony is as follows:

Q. Are you sponsoring any Exhibits with your direct testimony?

A. Yes. I am sponsoring Exhibit No. 2, Schedules 1 through 4, which were prepared under my direction. Avista’s credit ratings by S&P and Moody’s are summarized on page 1, of Schedule 1, and Avista’s actual capital structure at

December 31, 2014, and the proposed capital structure at December 31, 2015, are included on page 2, with supporting information on pages 3 and 4. Confidential Schedule 2 includes the Company's planned capital expenditures and long-term debt issuances by year. Confidential Schedule 3 includes our Interest Rate Risk Management Plan. Schedule 4 includes the equity ratios and returns on equity approved by various state regulatory commissions from July 1, 2014 to March 31, 2015.

II. FINANCIAL OVERVIEW

Q. Please provide an overview of Avista's financial situation.

A. We are operating the business efficiently to keep costs as low as practicable for our customers, while at the same time ensuring that our energy service is reliable and customers are satisfied. An efficient, well-run business is not only important to our customers but also important to investors. Our capital financing plan and our execution of that plan provide a prudent capital structure and liquidity necessary for utility operations. We initiate regulatory processes to recover our costs in a timely manner with the goal of achieving earned returns close to those allowed by regulators in each of the states we serve. These elements –

cost management, capital and revenues that support operations – are key determinants to the rating agencies when they are reviewing our overall credit ratings.

Q. What are steps the Company is taking to maintain and improve its financial health?

A. We are working to assure there are adequate funds for operations, capital expenditures and debt maturities. We obtain a portion of these funds through the issuance of long-term debt, which is supported by our interest rate risk mitigation plan, and we maintain a proper balance of debt and common equity through regular securities issuances and other transactions. We create financial plans and forecasts to model our income, expenses and investments, providing a basis for prudent financial planning. We seek timely recovery of our costs through general rate cases and other ratemaking mechanisms.

The Company currently has a sound financial profile and it is very important for Avista to maintain and enhance its financial position in order to access debt and equity financing under reasonable terms, as Avista funds significant future capital investments and refinances maturing debt.

III. BUSINESS TRANSACTIONS IN 2014

Q. The Company completed two significant business unit transactions in 2014. Please give an overview of these transactions.

A. On June 30, 2014, the Company completed the sale of its former Ecova business unit to Cofely USA Inc, an indirect subsidiary of GDF SUEZ, a French multinational utility company. On July 1, 2014, the Company acquired Alaska Energy and Resources Company (AERC) by issuing Avista common stock to the holders of AERC common stock in exchange for their shares. AERC's primary subsidiary is Alaska Electric Light and Power Company (AEL&P), which provides electric service to the City and Borough of Juneau, Alaska. These business unit transactions also led the Company to implement a common stock share repurchase program.

Q. How did the Ecova sale transaction affect Avista's capital structure?

A. Avista received cash for the sale of Ecova. The price for the Ecova sale was $335 million, which was reduced for payment of debt and other customary closing adjustments. After repayment of debt and payments to Ecova option holders and non-controlling interests, and deductions for transaction expenses and a portion of proceeds held in escrow, the net cash to Avista at closing was $205.4 million. Avista's gain on the transaction resulted in income tax obligations of approximately $85.8 million. Avista expects to receive approximately $13.1 million from the escrow later in 2015, resulting in total net cash proceeds to Avista of $133.2 million. Certain post-closing adjustments may affect the final net proceeds and an indemnity escrow will be held until 15 months after the transaction closed.

The cash proceeds received on June 30, 2014, were initially used to reduce Avista's outstanding borrowings on the short-term bank credit facility, which reduced the outstanding balance from $151.5 million to zero, and a portion of the cash was placed in temporary investments.

Q. How did the AERC acquisition transaction, which closed on July 1, 2014, affect Avista's capital structure?

A. We initially funded this acquisition with the issuance of Avista common stock in exchange for the outstanding shares of AERC common stock. The purchase price for AERC at closing was $170 million, plus acquired cash of $19.7 million less the assumption of $38.8 million of outstanding debt and other closing adjustments per the merger agreement. The Avista common stock issued in exchange for AERC common stock was valued under the merger agreement at $32.46 per share, resulting in issuance of 4.5 million new shares of Avista common stock. The value of these shares based on the day of issue at a market price of $33.35 per share was $150.1 million. The transaction also required a cash payment of $4.7 million.

Following the closing of the transaction, debt was issued by AEL&P and by AERC to rebalance the capital structures of AEL&P and AERC. AEL&P issued $75 million of first mortgage bonds, backed by the assets of AEL&P, and paid off all of its outstanding debt (excluding debt related to a purchased power contract)[1]. AEL&P paid a $50 million dividend (via its parent, AERC) to Avista. AERC entered into a $15 million five-year term loan and paid a $15 million dividend to Avista. These funds from AERC and AEL&P were transferred to Avista, providing $65 million for utility capital investment and utility operating costs at Avista, and reduced Avista's external financing that would have otherwise occurred without these transactions. At December 31, 2014 AERC's capital structure was 49.7% equity and 50.3% debt.

AERC became a wholly-owned corporation of Avista. AEL&P, a vertically integrated electric utility providing electric service to the City and Borough of Juneau, continues to be a wholly-owned corporation of AERC. AERC and AEL&P are separate legal entities and their debt is backed by the

[1]AERC's debt and debt percentages referred to in this testimony exclude the debt obligation related to a power purchase agreement (PPA) contract held by AEL&P related to the Snettisham hydro electric generation facility.

assets and equity of AERC and AEL&P, and holders of their debt have no recourse against Avista. Avista does not provide collateral or guarantees related to AERC or AEL&P debt. The debt and equity of AERC are excluded from the capital structure proposed in Avista's rate filings.

Q. How did Avista's share repurchase program affect the Company's capital structure?

A. As I described earlier, we received cash proceeds from the sale of Ecova and we issued common stock to acquire AERC. The cash sale of Ecova and acquisition of AERC through the issuance of equity were completed, almost simultaneously, midway through 2014. We also completed new debt transactions to recapitalize AERC and AEL&P during the second half of 2014. These transactions provided a significant amount of cash to Avista, added significant equity to Avista's capital structure, and decreased debt.

The Company entered into a common stock repurchase program in 2014 to acquire shares of Avista common stock with cash. The share repurchase program was designed to reduce equity and move our overall capital structure closer to our target, which includes an equity ratio for our Idaho operations of approximately 50% equity.

We implemented a share repurchase program in June of 2014, prior to closing on the Ecova sale and contingent on the Ecova sale being completed as planned. The program allowed open market purchases of Avista common shares to start on July 7, 2014, with repurchase transactions carried out by an agent independent of Avista. The program authorized up to four million shares to be repurchased by December 31, 2014, subject to various parameters that were set in June 2014. Daily purchase volumes and prices were dependent on the market for Avista shares. The Company retained the right to terminate the program at any time and could not guaranty that the authorized number of shares would be repurchased. When the program expired December 31, 2014, the repurchases totaled 2,529,615 shares at a total cost of $79.9 million for an average cost of $31.57 per share. On December 31, 2014, Avista's common equity percentage for the Idaho jurisdiction was 50.4%.

We implemented a second share repurchase program in December 2014, based on an expectation that the 2014 program would not reach the four million share maximum before it expired on December 31, 2014. The second program authorized up to 800,000 shares to be purchased during the first quarter of 2015, subject to certain daily volume and price parameters. When the program expired March 31, 2015, the repurchases totaled 89,400 shares at a total cost of $2.7 million for an average cost of $32.66 per share.

IV. CAPITAL EXPENDITURES

Q. What is the Company's recent history related to capital investments?

A. We are making significant capital investments in electric generation, transmission and distribution facilities, our natural gas distribution system, and new technology to better serve the needs of our customers. These investments target, among other things, the preservation and enhancement of safety, service reliability and the replacement of aging infrastructure. For the period 2011 through 2014, our capital expenditures totaled $1.15 billion. While there are variations among the functional areas targeted for investment each year, the predominant areas have included electric generation, transmission and distribution facilities, natural gas distribution plant, new customer hookups, environmental and regulatory requirements, information technology and other supporting functions, such as fleet services and facilities.

Q. In general, has the overall level of capital investment during these years (2011-2014) matched the annual capital requests submitted by the Company's various departments?

A. No. As Company witness Ms. Schuh explains in her testimony, Avista has a Capital Planning Group that meets regularly to review and prioritize proposed utility capital investment projects. Avista has typically chosen not to fund all of the capital investment projects proposed by the various departments, driven primarily by the Company's desire to mitigate the retail rate impacts to customers. Decisions to delay funding certain projects are made only in cases where the Company believes the amount of risk associated with the delay is reasonable and prudent.

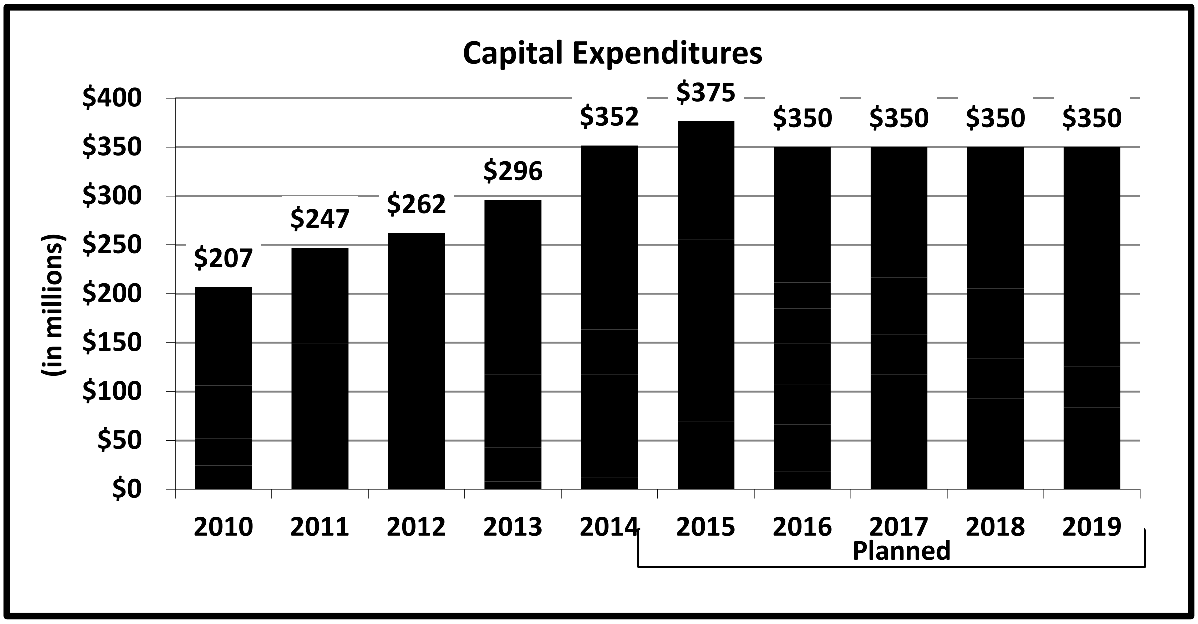
Q. What does Avista consider in setting the overall level of capital investment each year?

A. A range of factors influences the level of capital investment made each year, including but not limited to: 1) the level of investment needed to meet safety, service and reliability objectives and to further optimize our facilities; 2) the degree of overall rate pressure faced by our customers; 3) the variability of investments required for major projects; 4) unanticipated capital requirements, such as an unplanned outage of a large generating unit; 5) the cost of debt; and 6) the opportunity to issue equity on reasonable terms.

Q. What are Avista's planned capital expenditure levels for the next five years?

A. We expect to continue investing at a similar level as 2014 for the next five years, with a slightly higher amount in 2015 to complete certain larger projects. The chart in Illustration No. 1 below summarizes the capital expenditure levels for recent years, as well as planned expenditures through 2019.

Illustration No. 1:



After the Company's expected $375 million capital investments in 2015, the capital expenditure level is expected to be $350 million annually from 2016 through 2019.

Q. Why did the Company increase the level of its capital expenditures in recent years?

A. Three primary drivers have affected Avista's level of capital investment: 1) the business need to fund a greater portion of the departmental requests for new capital investments that in the past have not been funded; 2) the need to capture investment opportunities and benefits identified by our asset management capabilities, and 3) a continued focus on controlling the increase in operation and maintenance (O&M) spending through prudent capital investment.

Q. Please provide some examples that illustrate the key drivers.

A. Our aging and changing infrastructure provides several challenges we need to manage to keep costs under control into the future. Asset management programs and projects include wood pole management, Aldyl-A pipe replacement, transmission line rebuilds, and substation equipment replacements and rebuilds. These asset management capital investments are replacing old and failing assets using a planned and systematic approach to reduce outages, control costs to benefit customers over the life of these assets, and reduce risks associated with failed equipment.

Q. Are there other reasons Avista believes this increased level of capital spending is appropriate?

A. Yes. Interest rates remain near all-time lows, so funding these capital projects now will result in a lower long-term cost to customers, rather than waiting until interest rates and inflation rise. In addition, Avista currently does not have a need for new capacity and energy resources or new renewable resources, which would otherwise put upward pressure on retail rates. Furthermore, electric and natural gas commodity costs continue to be relatively stable as compared to past years, and are expected to remain relatively stable for the near future.

Funding the additional needed capital investment projects now will result in lower overall bill impacts to customers rather than waiting until a time when retail rates are being driven higher by increasing commodity costs, construction of new capacity and energy resources, and/or higher inflation and interest rates.

V. MATURING DEBT

Q. How is Avista affected by maturing debt obligations in the next five years?

A. In the next five years the Company is obligated to repay maturing long-term debt totaling $452.5 million. The table in Illustration No. 2 below shows the Company's maturing long-term debt from 2015 through 2019. Within this five-year period, a large concentration – $272.5 million – matures within the second quarter of 2018.

Illustration No. 2:

Avista Corp. Long-Term Debt Maturities, 2015 to 2019				
Maturity Year	**Principal Amount**	**Coupon Rate**	**Date Issued**	**Maturity Date**
2015	$0	-	-	-
2016	$ 90,000,000	0.840%	8-14-2013	8-14-2016
2017	$0	-	-	-
2018	$7,000,000	7.390%	5-11-1993	5-11-2018
	$250,000,000	5.950%	4-3-2008	6-1-2018
	$15,500,000	7.450%	6-9-1993	6-11-2018
2019	$90,000,000	5.450%	11-18-2004	12-1-2019
Total	**$452,500,000**			

These debt obligations originated as early as 1993 and their original terms were three, ten, fifteen and twenty-five years. These maturing obligations represent nearly a third (32.5%) of the Company’s long-term debt outstanding at the end of 2014, which is a significant portion of our capital structure. The Company typically replaces maturing long-term debt with new issuances of debt. It will be necessary for Avista to be in a favorable financial position to complete the expected debt refunding, under reasonable terms, while also obtaining debt and equity to fund capital expenditures each year.

Q. What are the Company’s expected long-term debt issuances through 2019?

A. To provide adequate funding for the significant capital expenditures noted in Section IV above and to repay maturing long-term debt, we are forecasting the issuance of long-term debt in each year through 2019. We plan to issue $100 million in 2015. Issuances planned for 2016 through 2019 are provided in Exhibit No. 2, Confidential Schedule 2.

Q. Are there other debt obligations that the Company must consider?

A. Yes. In addition to long-term debt, the Company's $400 million revolving credit facility expires in April 2019. The Company relies on this credit facility to provide, among other things, funding to cover month-to-month variations in cash flows, interim funding for capital expenditures, and credit support in the form of cash and letters of credit that are required for energy resources commitments and other contractual obligations. Our credit facility was amended in April 2014, which stretched the expiration date to April 2019, five years past the amendment date, and reduced interest rates and fees. We expect to initiate the renewal or replacement of the credit facility before the existing arrangement expires. Any outstanding balances borrowed under the revolving credit facility become due and payable when the facility expires. Again, a strong financial position will be necessary to gain access to a new or renewed revolving credit facility, under reasonable terms, prior to expiration of the existing facility.

VI. CAPITAL STRUCTURE

Q. What are the capital structure and rate of return the Company requests in this proceeding?

A. Our requested capital structure is 50.0 percent debt and 50.0 percent equity with a requested overall rate of return in this proceeding of 7.62 percent, as shown in Illustration No. 3 below. The requested capital structure is based on our forecasted capital structure at December 31, 2015.

Illustration No. 3:

AVISTA CORPORATION
Proposed Cost of Capital

	Proposed Structure	Cost	Component Cost
Total Debt	50.0%	5.34%	2.67%
Common Equity	50.0%	9.90%	4.95%
Total	100%		**7.62%**

Q. Is the capital structure reflected in Illustration No. 3 above calculated in a manner similar to the capital structure calculated in Avista's recent rate proceedings?

A. Yes, with certain updates. This methodology considers debt and equity outstanding for our Avista Utilities' regulated business, including the impact of costs related to the issuance of that debt and equity.

In recent rate proceedings our capital structure calculation considered the impact of our former subsidiary, Ecova. The Ecova impact is completely removed since Ecova was sold in mid-2014.

The capital related to AERC and its subsidiary, AEL&P, does not impact the capital structure calculation for the Avista Utilities’ rate proceeding. Debt and equity for AERC, which was acquired in mid-2014, are excluded from this calculation for Avista Utilities.

Q. How does the Company determine the amount of long-term debt and common equity to be included in its capital structure?

A. As a regulated utility, Avista has a continuing obligation to provide safe and reliable service to customers while balancing safety and economy, in both the short term and long term. Through our planning process, we determine the amount of new financing needed to support our capital expenditure programs while maintaining an optimal capital structure that balances and supports our current credit ratings and provides flexibility for anticipated future capital requirements.

Q. Why is the Company proposing a 50.0 percent equity ratio?

A. On December 31, 2014, Avista’s common equity percentage for the Idaho jurisdiction was 50.4%. The Company continues to evaluate the extent and timing of equity issuances for 2015, taking into account our capital expenditures and other financial requirements.

Maintaining a 50.0 percent common equity ratio has several benefits for customers. We are dependent on raising funds in capital markets throughout all business cycles. These cycles include times of contraction and expansion. A solid financial profile will assist us in accessing debt capital markets on reasonable terms in both favorable financial markets and when there are disruptions in the financial markets.

Additionally, a 50.0 percent common equity ratio solidifies our current credit ratings and supports our long-term goal of moving our corporate credit rating from BBB to BBB+. A rating of BBB+ would be consistent with the natural gas and electric industry average, which I will further explain later in my testimony. We rely on credit ratings in order to access capital markets on reasonable terms. Moving further away from non-investment grade (BB+) provides more stability for the Company, which is also beneficial for customers. We believe our requested 50.0 percent equity ratio appropriately balances safety and economy for customers.

Q. In attracting capital under reasonable terms, is it necessary to attract capital from both debt and equity investors?

A. Yes, it is absolutely essential. As a publicly traded company we have two primary sources of external capital: debt and equity investors. As of December 31, 2014, we had approximately $2.8 billion of long-term debt and equity. Approximately half of our capital structure is funded by debt holders, and the other half is funded by equity investors and retained earnings. Rating agencies and potential debt investors place significant emphasis on maintaining credit metrics and credit ratings that support access to debt capital markets under reasonable terms. Leverage – or the extent that a company uses debt in lieu of equity in its capital structure – is a key credit metric and, therefore, access to equity capital markets is critically important to long-term debt investors. This emphasis on financial metrics and credit ratings is shared by equity investors who also focus on cash flows, capital structure and liquidity, much like debt investors.

The level of common equity in our capital structure can have a direct impact on investors’ decisions. A balanced capital structure allows us access to both debt and equity markets under reasonable terms, on a sustainable basis. Being able to choose specific financing methods at any given time also allows the Company to take advantage of better choices that may prevail as the relative advantages of debt or equity markets can ebb and flow at different times.

Q. Are the debt and equity markets competitive markets?

A. Yes. Our ability to attract new capital, especially equity capital, under reasonable terms is dependent on our ability to offer a risk/reward opportunity that is equal to or better than the equity investors’ other alternatives. We are competing not only with other utilities, but also with businesses in other sectors of the economy. Demand for our stock supports our stock price, which provides us the opportunity to issue additional shares under reasonable terms to fund capital investment requirements.

Q. What is Avista doing to attract equity investment?

A. We are requesting a capital structure that provides us the opportunity to have financial metrics that offer a risk/reward proposition that is competitive and/or attractive for equity holders.

We have steadily increased our dividend for common shareholders over the past several years, to work toward a dividend payout ratio that is comparable to other utilities in the industry. This is an essential element in providing a competitive risk/reward opportunity for equity investors.

Tracking mechanisms, such as the Power Cost Adjustment and the Purchased Gas Adjustment approved by the regulatory commissions, and the proposed fixed cost adjustment mechanism, help balance the risk of owning and operating the business in a manner that places us in a position to offer a risk/reward opportunity that is competitive with not only other utilities, but with businesses in other sectors of the economy.

VII. PROPOSED RATE OF RETURN

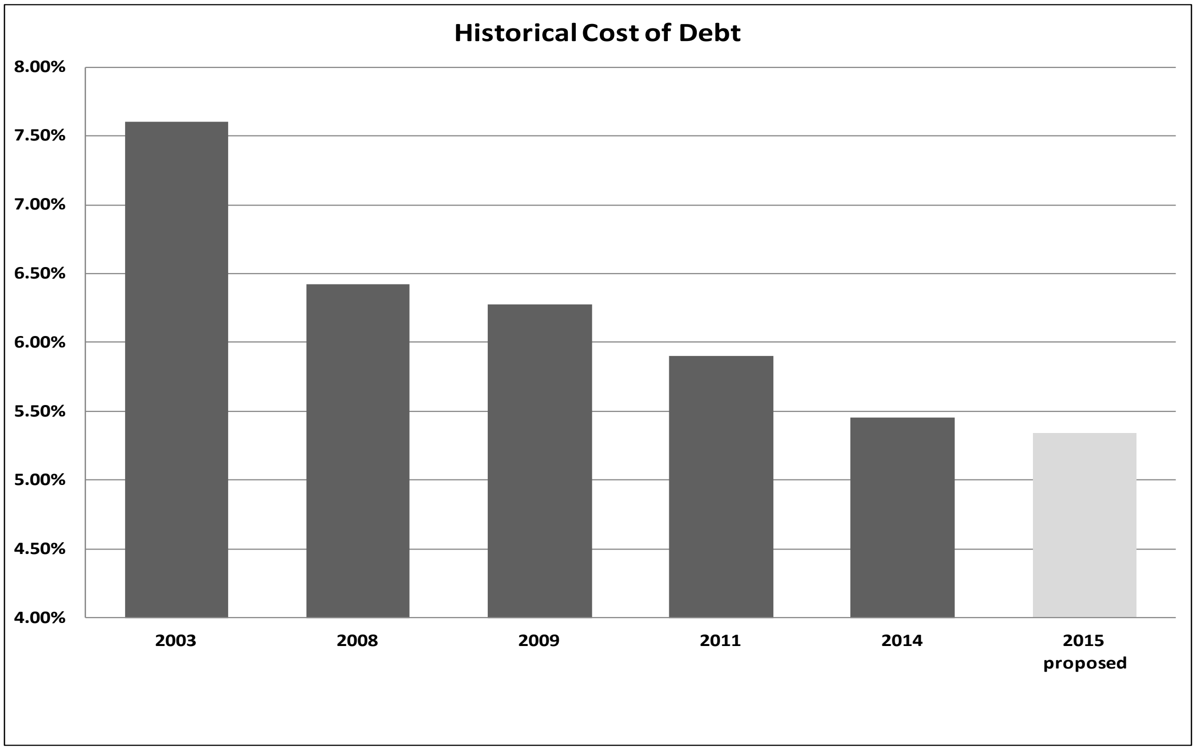
Q. Has Avista prepared an exhibit that includes the components of Avista's requested rate of return of 7.62 percent?

A. Yes. Exhibit No. 2, Schedule 1, page 2, shows the components of Avista’s requested rate of return of 7.62 percent.

Q. What is the Company's overall cost of debt, and how does it compare to its historical cost?

A. Our requested overall cost of debt is 5.34 percent. The cost of debt has trended downward for Avista from 2003 to 2015, as shown in Illustration No. 4 below.

<u>Illustration No. 4:</u>



Q. Please explain why Avista's cost of long-term debt has continued to decrease.

A. There has been a general decline in interest rates for several years while Avista has issued new debt, causing the Company's overall cost of debt to decrease. We have been prudently managing our interest rate risk in anticipation of periodic debt issuances, which has involved fixed rate long-term debt with varying maturities, and executing forward starting interest rate swaps to mitigate interest rate risk on a portion of the future maturing debt and our overall forecasted debt issuances.

From 2011 through 2014 we issued $315 million in long-term debt. The weighted average rate of these issuances is 3.30 percent. These issuances have varying maturities ranging from 3 years to 35 years, and a weighted average maturity of 23.6 years.

Our most recent issuance (in 2014) was $60 million of first mortgage bonds with a thirty-year maturity at a rate of 4.11 percent. This new debt, which matures in 2044, is the lowest priced debt with a term beyond twenty years that the Company has issued since the 1950s. The effective cost of this debt is even lower at 3.65%, which includes the cost of issuance and the impact of interest rate hedges. The $5.4 million positive value of the interest rate hedges (hedges were settled when the coupon rate was set) improved the effective yield on this debt by 0.52%. I will discuss the interest rate hedging program later in my testimony.

The prior year (in 2013) we issued $90 million of three-year debt (maturing in 2016) at a very favorable rate of 0.84%. The effective cost of this debt is a negative 0.04%, which includes the cost of issuance and the impact of interest rate hedges. We received $2.9 million for settled interest rate hedges, which improved the effective yield on this debt by 1.07%.

We have continued to issue debt with varying maturities to balance the cost of debt and the weighted average maturity. This practice has provided us with the ability to take advantage of historically low rates on both the short end and long end of the yield curve.

The Company’s credit ratings have supported reasonable demand for Avista debt by potential investors. We have further enhanced credit quality and reduced interest cost by issuing debt that is secured by first mortgage bonds.

We plan to continue issuing long-term debt with various maturities for the foreseeable future in order to fund our capital expenditure program and long-term debt maturities.

Q. What is the Company doing to mitigate interest rate risk related to future long-term debt issuances?

A. Our future borrowing requirements are primarily driven by our significant capital expenditure program and maturing debt, which creates exposure to interest rate risk. As mentioned earlier, we have $1.8 billion in forecasted capital expenditures over the next five years. Additionally, we have $452.5 million of debt maturing during the same period. We are forecasting the issuance of approximately

$900 million in long-term debt from 2015 through 2019 to fund these capital expenditures and maturing debt while maintaining an appropriate capital structure.

To mitigate interest rate risks, we hedge the rates for a portion of forecasted debt issuances over several years leading up to the date we anticipate each issuance. We also manage interest rate risk exposure by limiting the extent of outstanding debt that is subject to variable interest rates rather than fixed rates. In addition, we issue fixed rate long-term debt with varying maturities to manage the amount of debt that is required to be refinanced in any period (looking ahead to its future maturity), and to obtain rates across a broader spectrum of prevailing terms which tend to be priced at different interest rates.

Q. Does the Company have guidelines regarding its interest rate risk management?

A. Yes. The Company’s Interest Rate Risk Management Plan, attached as Exhibit No. 2, Confidential Schedule 3, is designed to provide a certain level of stability to future cash flows, and ultimately retail rates related to future interest rate variability. The plan provides guidelines for hedging a portion of interest rate risk with financial derivative instruments. We settle these hedge transactions for cash simultaneously when a related new fixed-rate debt issuance is priced in the market. The settlement proceeds (which may be positive or negative) are amortized over the life of the new debt issuance.

The interest rate risk management plan provides that hedge transactions are executed solely to reduce interest rate uncertainty on future debt that is included in the Company's five-year forecast. The hedge transactions do not involve speculation about the movement of future interest rates.

Q. The Company is requesting a 9.9 percent return on equity. Please explain why the Company believes this is reasonable?

A. We agree with the analyses presented by Company witness Mr. McKenzie which demonstrate that the proposed 9.9 percent ROE, together with the proposed equity layer of 50 percent, would properly balance safety and economy for customers, provide Avista with an opportunity to earn a fair and reasonable return, and provide access to capital markets under reasonable terms on a sustainable basis. The proposed weighted cost of equity is 4.95% (9.9% times 50%).

Q. How does Avista's requested 4.95 percent weighted cost of equity compare with the weighted cost of equity recently approved for electric and natural gas utilities in other jurisdictions?

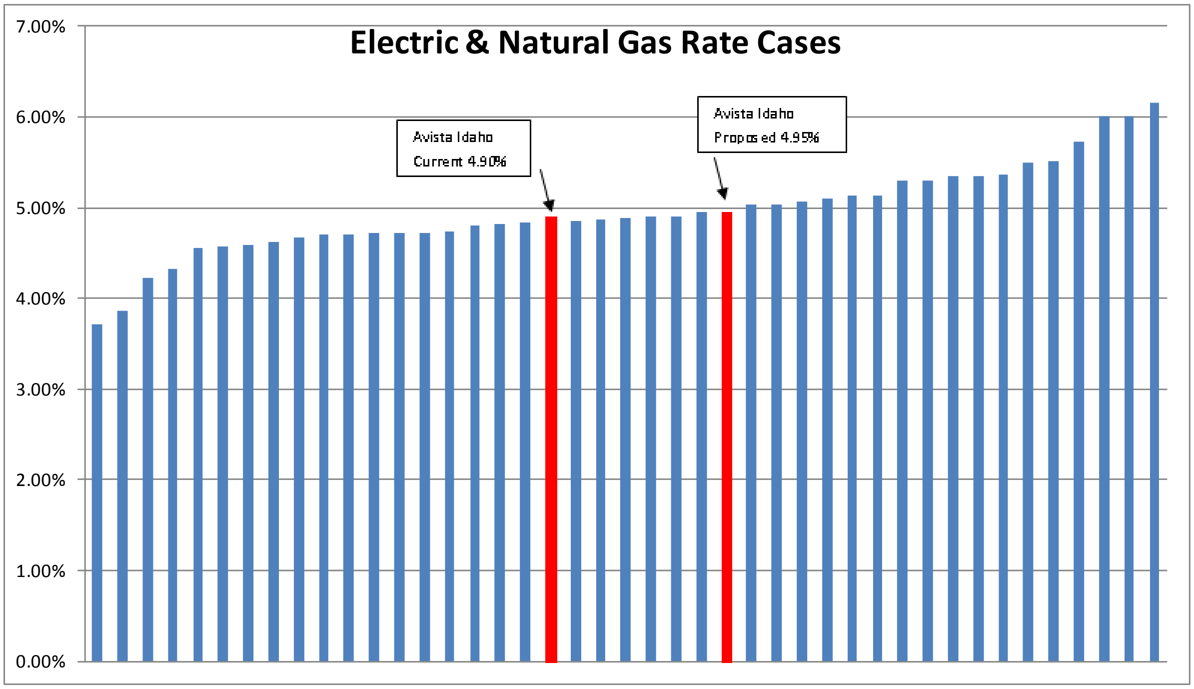
A. The bar chart in Illustration No. 5 below shows the weighted cost of equity approved by state regulators for investor-owned electric and natural gas utilities across the country for the period from July 1, 2014 through March 31, 2015. These data in the bar chart represent all of the commission decisions that specify an ROE and equity ratio for utilities in the nine-month period.

Avista's proposed weighted cost of equity of 4.95 percent, which is also shown in the chart, is in the middle of the range of these weighted cost of equity numbers. Avista's current authorized weighted cost of equity of 4.9 percent is also shown on the chart, which is based on a 50 percent equity ratio and a 9.8 percent ROE. Additional details related to this chart, including the names of the utilities, are provided in Exhibit No. 2, Schedule 4.

Because Avista competes with other utilities for equity investor dollars, it is important for Avista to be able to provide an earnings opportunity that is competitive with other utilities.

Illustration No. 5:

Weighted Cost of Equity: Electric and Natural Gas Rate Cases[2]



VIII. CREDIT RATINGS

Q. How important are credit ratings for Avista?

A. Utilities require ready access to capital markets in all types of economic environments. The capital intensive nature of our business, with energy supply and delivery dependent on costly long-term capital projects to fulfill our obligation to serve customers, necessitates the ability to obtain funding from the financial markets under reasonable terms at regular intervals. In order to have this ability,

[2]Source: SNL Financial. Rate Cases finalized July 1, 2014 through March 31, 2015. Items added (red bars): 1) Avista's last approved return from the Idaho Commission and 2) Avista's proposed return in the current filing.

investors need to understand the risks related to any of their investments. Financial commitments by our investors generally stretch for many years – even decades – and the potential for volatility in costs (arising from energy commodities, natural disasters and other causes) is a key concern to them. To help investors assess the creditworthiness of a company, nationally recognized statistical rating organizations (rating agencies) developed their own standardized ratings scale, otherwise known as credit ratings. These credit ratings indicate the creditworthiness of a company and assist investors in determining if they want to invest in a company and its comparative level of risk compared to other investment choices.

Q. Please summarize the credit ratings for Avista.

A. Avista's credit ratings, assigned by Standard & Poor's (S&P) and Moody's Investors Service are as follows:

Illustration No. 6:

	S&P	Moody's
Senior Secured Debt	A-	A2
Senior Unsecured Debt	BBB	Baa1
Outlook	Stable	Stable

Additional information on our credit ratings has been provided on page 1 of Exhibit No. 2, Schedule 1.

Q. Please explain the implications of the credit ratings in terms of the Company's ability to access capital markets.

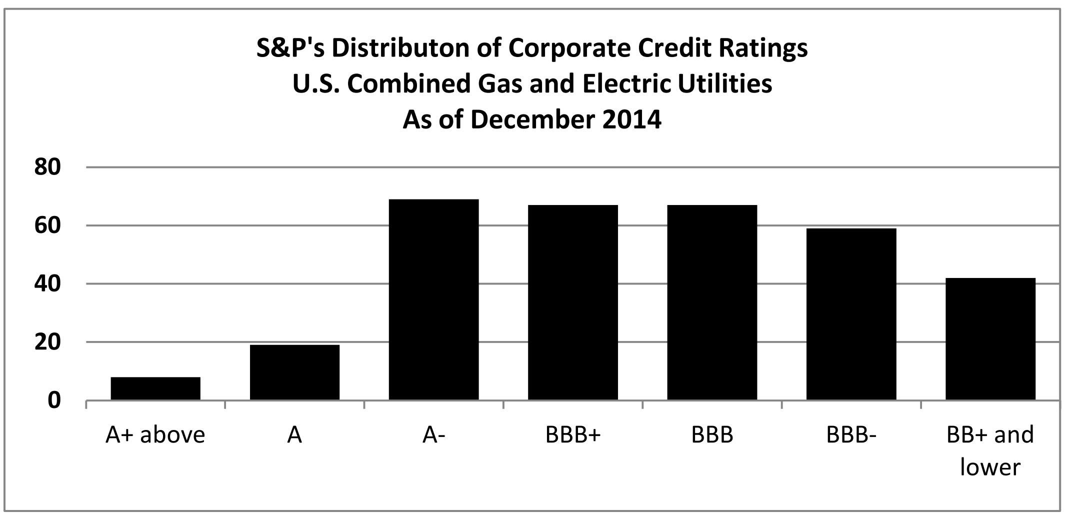
A. Credit ratings impact investor demand and expected returns. More specifically, when we issue debt the credit rating can affect the determination of the interest rate at which the debt will be issued. Credit ratings can also affect the type of investor who will be interested in purchasing the debt. For each type of investment a potential investor could make, the investor looks at the quality of that investment in terms of the risk they are taking and the priority they would have for payment of principal and interest in the event that the organization experiences severe financial stress. Investment risks include, but are not limited to, liquidity risk, market risk, operational risk, and credit risk. These risks are considered by S&P, Moody's and investors in assessing our creditworthiness.

In challenging credit markets, where investors are less likely to buy corporate bonds (as opposed to U.S. Government bonds), a higher credit rating will attract more investors, and a weaker credit rating could reduce or eliminate the number of potential investors. Thus, weaker credit ratings may result in a company having more difficulty accessing capital markets and/or incur significantly higher costs when accessing capital.

Q. What credit rating does Avista Corporation believe is appropriate?

A. Avista's current S&P corporate credit rating is BBB. We believe operating at a corporate credit rating level (senior unsecured) of BBB+ is comparable with other US utilities providing both electricity and natural gas. As shown in Illustration No. 7, the average credit rating for U.S. Regulated Combined Gas and Electric Utilities is BBB+.

<u>Illustration No. 7:</u>



We expect that a continued focus on the regulated utility, conservative financing strategies and a supportive regulatory environment will contribute toward an upgrade to a BBB+ corporate credit rating for Avista. Operating with a BBB+ credit rating would likely attract additional investors, lower our debt pricing for future financings, and make us more competitive with other utilities. In addition, financially healthy utilities are better able to invest in the required infrastructure over time to serve their customers, and to withstand the challenges facing the industry and potential financial market disruptions.

Q. How important is the regulatory environment in which the Company operates?

A. Both Moody’s and S&P cite the regulatory environment in which a regulated utility operates as the dominant qualitative factor to determine a company’s creditworthiness. Moody's rating methodology is based on four primary factors. Two of those factors – a utility’s “regulatory framework” and its “ability to recover costs and earn returns” – make up 50 percent of Moody’s rating methodology[3].

S&P states the following[4]:

> Regulation is the most critical aspect that underlies regulated integrated utilities’ creditworthiness. Regulatory decisions can profoundly affect financial performance. Our assessment of the regulatory environments in which a utility operates is guided by certain principles, most prominently consistency and predictability, as well as efficiency and timeliness. For a regulatory process to be considered supportive of credit

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[3]Moody’s Investors Service, Rating Methodology: Regulated Electric and Gas Utilities, December 23, 2013.

[4]Standard and Poor’s, Key Credit Factors: Business and Financial Risks in the Investor-owned Utility Industry, March 2010.

> quality, it must limit uncertainty in the recovery of a utility’s investment. They must also eliminate, or at least greatly reduce, the issue of rate-case lag, especially when a utility engages in a sizable capital expenditure program.

Because of the major capital expenditures planned by Avista and future maturities of long-term debt, a supportive regulatory environment is essential in maintaining and improving our current credit rating.

Q. Does this conclude your pre-filed direct testimony?

A. Yes.