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IDAHO PUBLIC UTILITIES COMMISSION LICUTILITIES 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-09-1/ AVU-G-09-1

DIRECT TESTIMONY OF BRYAN LANSPERY IDAHO PUBLIC UTILITIES COMMISSION MAY 29, 2009

forecasting, and weather normalization methods. I have participated in several general rate cases, focusing on power supply, cost of service, and rate design. I have also been actively engaged in integrated resource planning, DSM/energy efficiency program evaluation, and revenue allocation issues. I completed the Practical Skills for the Electric Industry held by New Mexico State University in 2006, among numerous other conferences.

- Q. What is the purpose of your testimony?
- A. My testimony will address the rate spread Staff proposes to utilize in distributing the recommended 3.91% increase in electric revenue requirement. I will further discuss Staff's position regarding base and PCA rates within Avista's customer rate schedules.
 - Q. Could you please summarize your testimony?
- A. Yes. Staff proposes an increase in Avista's electric revenues of 3.91%, or roughly \$8.62 million, as noted in Staff witness Vaughn's direct testimony. Given Staff's concerns about viable cost of service results, as discussed by Staff witness Hessing, Staff recommends the increase be distributed uniformly among rate classes. Furthermore, I recommend that the increase be collected solely through the energy rate. I will also provide the results of Staff's adjustment to the Company's proposed 5% average reduction to the current PCA rate.

- Q. Are you sponsoring any exhibits in support of your testimony?
- A. Yes, Staff Exhibit No. 124, consisting of two pages.
- Q. What is the impact on electric residential rates of spreading the Staff's proposed increase solely on energy?
- A. By leaving the basic monthly charge at the current level of \$4.60, a uniform 3.91% increase in revenues results in a 4.04% increase in residential energy rates.
- Q. Why do you believe that the monthly basic charge for residential customers should remain at its current level?
- A. The Commission approved a 15% increase in the monthly customer charge in the Company's last general rate case (Case No. AVU-E-08-01). One of the drivers of that case was the investment in advanced metering. It is understood that the cost of the metering equipment will be offset by reductions in meter reading and billing expenditures, the components Staff traditionally believes constitute the makeup of the customer charge. With low levels of growth in residential customers and the minimal role distribution costs play in this proceeding, I believe the current basic charge adequately provides cost recovery

for metering and billing expenses.

Q. Are there other reasons for not increasing the residential basic charge?

A. Yes. Given Staff's position that the basic charge covers meter reading and billing, there is little if any rationale for having disparate customer charges on the electric and natural gas bills. The basic charge for a residential electric customer is already 60 cents greater than the basic charge for a gas customer, and given Staff's proposal on the gas side, I do not wish to further amplify the difference. In fact, once Avista has had more adequate time to review its advanced metering system, Staff would entertain discussions on whether the efficiencies of being a dual electric-gas customer should be reflected in the basic monthly charge.

Also, placing the revenue increase on energy rates still preserves the notion of price signaling. While the proposed increase is relatively small, customers will have an opportunity to respond if the increase is borne in the energy rates rather than the customer charge. If the Commission grants Staff's revenue requirement and Avista's proposal to increase the monthly basic charge to \$5.00, a disproportionate share (15%) of the increase will be collected through the fixed monthly charge. A rate increase of nearly 10% would be required to justify raising

the basic charge to \$5.00 if all billing determinants were to be uniformly increased.

- Q. Will applying the rate increase only to energy impede Avista's ability to collect its authorized fixed costs?
- A. Minimally at most. It is true that recouping fixed costs through energy rates inherently places recovery at risk. Staff's proposal though is modest, and customer response, i.e. reduced consumption, presumably will be negligible based on price elasticity studies. Moreover, Staff's proposal puts less cost recovery on the upper tier than the Company's proposal.
- Q. Avista has proposed to increase the rate differential between residential rate blocks to send a price signal. Do you agree?
- A. No, I do not. The Company proposes increasing the differential between blocks from 13.2% to 14.6%, while my proposal will keep the differential at 13.2%.
- Q. Does this run contrary to recent Commission decisions regarding rate design and the promotion of efficient energy use?
- A. I do not believe so. Staff argued in the 2008

 Idaho Power general rate case (Case No. IPC-E-08-10) that

 effective rate design should rely on cost-based price

 signals to promote efficient energy consumption. Avista is

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in a much different situation than Idaho Power. First of all, Avista has a significantly higher system load factor that Idaho Power has, or in other words, Avista's system does not have the same "peakiness" Idaho Power's has (the difference between Avista's highest and lowest demand by month is 471 MW, as opposed to 1,130 MW for Idaho Power). The resources that Avista relies on to serve its customers are mostly coal-fired or hydroelectric, baseload resources, and now with the proposed addition of the Lancaster facility, intermediate load resources. Avista does not rely on costly marginal resources to meet short durations of extreme peak load as Idaho Power and Rocky Mountain The 'cost-based' aspect of sending price Power must. signals is much weaker for Avista when compared to Idaho Power.

Secondly, as noted in my testimony from the 2008

Idaho Power general rate case, rates should not unduly
burden a subset of residential customers. The economic
climate in Northern Idaho is much worse than Southern

Idaho. As Staff witness Thaden states in his testimony,
Avista's service territory has the highest poverty level in
the state compared to the other regulated electric
utilities, and a disproportionate share of customers
receiving LIHEAP assistance. Nearly 60% of Avista
customers who received LIHEAP last season live in all

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electric homes. At this time, I do not believe it is wise to place the burden of the rate increase disproportionately on the tail block for Avista.

Finally, we have no better load research data than we did one year ago. Accurate load data is the first essential step to cost-based rate design. With the data presumably available beginning in early 2010, I believe that tinkering with rate design is premature at this point. As a compromise, I believe recovering the approved revenue increase through energy rates provides adequate cost recovery and opportunities for energy efficiency practices by customers.

- Q. If the Commission approves a rate increase greater than Staff's proposal, would you still support increasing only the energy charge?
- A. Yes, to a point. I do believe that until the load sampling data is available, a uniform increase is appropriate. As stated earlier, a rate increase of nearly 10% (8.7%) is necessary to warrant increasing the basic charge to \$5.00. Should the Commission approve an increase greater than or equal to 8.7%, I believe that all billing determinants should be increased. That said, a moderate increase in the basic charge may be warranted, but I would not expect nor support a 25% increase in the basic charge over a two-year period.

- Q. Are you proposing that Staff's revenue increase be spread only to energy for the remaining customer classes as well?
- A. With the exception of the street and area lighting schedules, yes, for virtually the same reasons as outlined above. For street and area lighting (Schedules 41 through 49), Staff would support spreading the \$111,268 revenue increase in the manner described in Company witness Hirschkorn's direct testimony.
- Q. Have you included Staff Exhibit No. 124 to support your rate spread proposal?
- A. Yes. In Staff Exhibit No. 124, Column (b) provides the current base, or tariff rates in place.

 Columns (c) and (d) present Staff's proposed increase in rates in both percentage and nominal terms, respectively.

 Column (e) presents Staff's calculated tariff rates based on its recommended revenue increase. It is important to note that this is not the billed rate as it does not contain the other rate adjustments, such as the PCA and Energy Efficiency Rider.
- Q. Could you please explain the last two columns in Staff Exhibit No. 124?
- A. Yes. As Mr. Hessing describes in his direct testimony, Staff proposes accepting the Company's proposal to adjust the PCA surcharge rate, but prefers to adjust it

only to a level that offsets the average rate increase of 3.91%. Mr. Hessing has calculated the new PCA rate to be 0.3611 cents per kWh, or a reduction of 0.2489 cents per kWh as shown in Column (f). Column (e) reports Staff's net changes to rates per this case. The following table summarizes the change in energy rates proposed by Staff:

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	Increase Energy Rt.	Change in Net PCA Rate Change	
Resid. (1)	4.04%	(3.43%) 0.61%	
Gen. Srvc. (11)	4.21%	(3.01%) 1.20%	
Lg. Gen. Srvc. (21)	4.95%	(4.47%) 0.48%	
Ex. Lg. Gen. Srvc. (25)	4.64%	(6.11%) (1.47%)	
Potlatch (25P)	4.40%	(6.41%) (2.01%)	
Pumping Srvc. (31)	3.98%	(3.48%) 0.50%	

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Under Staff's proposal, base energy rates would increase between roughly 4% and 5%, which is mostly negated for the near term by the PCA reduction. Not surprisingly, high load factor customers would see a temporary decrease under Staff's proposal.

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- What is the impact of Staff's proposal to the average Avista residential electric customer's bill?

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The average electric customer who uses 982 kWh a Α. month currently sees a bill of \$78.47, which includes all

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1	rate adjustments. Staff's proposal would result in a bill
2	of \$78.76, an increase of 29 cents.
3	Q. Do you propose any additional adjustments to the
4	Company's rate design?
5	A. At this time, I do not.
6	Q. Does this conclude your direct testimony in this
7	proceeding?
8	A. Yes, it does.
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IDAHO PUBLIC UTILITIES COMMISSION STAFF
CASE NO. AVU-E-09-01
PRESENT AND PROPOSED RATE COMPONENTS BY SCHEDULE

						Total Percentage
	Present Tariff	Proposed Percentage	Proposed Rate	Proposed Tariff	Staff PCA	Change in Rates Per Staff
	Base Rate	Increase	Increase	Base Rate	Decrease	Proposal
(e)	(q)	(0)	(p)	(e)	())	(8)
Residential Service Sch. 1						
Basic Charge	\$4.60	%0	•	\$4.60		
Energy Charge:						
0-600 kWh	6.552	4.04%	0.265	6.817	(0.2489)	0.25%
All kWh over 600	7.416	4.04%	0.3	7.716	(0.2489)	0.69%
General Service Sch. 11, 12						
Basic Charge	\$6.50	%0	· \$	\$6.50		
Demand Charge (Over 20 kW)	\$4	%0	· \$	\$4.00		
Energy Charge:						
0-3,650 kWh	8.208	4.21%	0.345	8.553	(0.2489)	1.17%
All kWh over 3,650	7.001	4.21%	0.295	7.296	(0.2489)	%99'0
Large General Service Sch. 21, 22						
Demand Charge:						
50 kW or Less	\$275	%0	•	\$275		
Over 50 kW	\$3.50/kW	%0	· •	\$3.50/kW		
Energy Charge:						
0-250,000 kWh	5.384	4.95%	0.266	5.650	(0.2489)	0.32%
All kWh over 250,000	4.594	4.95%	0.227	4.821	(0.2489)	-0.48%
Primary Voltage Discount	\$0.20/kW	%0	\$	\$0.20/kW		

Note: Energy rates are in ¢/kWh

IDAHO PUBLIC UTILITIES COMMISSION STAFF
CASE NO. AVU-E-09-01

PRESENT AND PROPOSED RATE COMPONENTS BY SCHEDULE

						Total
						Percentage
		Proposed				Change in Rates
	Present Tariff	Percentage	Proposed Rate	Proposed Rate Proposed Tariff	Staff PCA	Per Staff
	Base Rate	Increase	Increase	Base Rate	Decrease	Proposal
(a)	(q)	(0)	(p)	(e)	(£)	(8)
Extra Large General Service Sch. 25						
Demand Charge:						
3,00 kva or less	\$10,000	%0		\$10,000		
Over 3,000 kva	\$3.25/kva	%0	, \$	\$3.25/kva		
Energy Charge:						
0-500,000 kWh	4.411	4.64%	0.205	4.616	(0.2489)	-1.00%
All kWh over 500,000	3.736	4.64%	0.173	3.909	(0.2489)	-2.03%
Primary Voltage Discount	\$0.20/kW	%0	٠ \$	\$0.20/kW		
Annual Minimum	\$571,460			\$592,410		
Potlatch Sch. 25P			•	•		
Demand Charge:			•	, \$		
3,00 kva or less	\$10,000	\$0	\$	\$10,000		
Over 3,000 kva	\$3.25/kva	\$0	,	\$3.25/kva		
Energy Charge:						
All kWh	3.722	4.40%	0.164	3.886	(0.2489)	-2.28%
Primary Voltage Discount	\$0.20/kW	%0	•	\$0.20/kW		
Annual Minimum	\$529,420		· •	\$547,460		
Pumping Service Sch. 31, 32			, \$	•		
Basic Charge	\$6.50	%0	· \$	\$6.50		
Energy Charge:			\$	•		
First 165 kW/kWh	7.37	3.98%	0.294	7.664	(0.2489)	0.61%
All other kWh	6.284	3.98%	0.250	6.534	(0.2489)	0.02%
<u>Lighting Schedules 41-49</u>						
Revenues	\$2,842,126	3.9%	\$111,268	\$2,953,394		

Note: Energy rates are in c/kWh

Exhibit No. 124 Case No. AVU-E-09-1 AVU-G-09-1 B. Lanspery, Staff 05/29/09 Page 2 of 2

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 29TH DAY OF MAY 2009, SERVED THE FOREGOING **DIRECT TESTIMONY OF BRYAN LANSPERY**, IN CASE NOS. AVU-E-09-1 & AVU-G-09-1, BY ELECTRONIC MAIL TO THE FOLLOWING:

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