

DAVID J. MEYER
VICE PRESIDENT AND CHIEF COUNSEL OF
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

RECEIVED
2010 MAR 23 AM 11:16
IDAHO PUBLIC
UTILITIES COMMISSION

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-10-01
CASE NO. AVU-G-10-01

DIRECT TESTIMONY
OF
ELIZABETH M. ANDREWS

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

1	<u>CONTENTS</u>	
2	<u>Section</u>	<u>Page</u>
3	I Introduction	2
4	II Combined Revenue Requirement Summary	4
5	III Electric Section	5
6	Test Period & Pro Forma Period	5
7	Revenue Requirement	11
8	Standard Commission Basis & Restating Adjustments	13
9	Pro Forma Adjustments	35
10	IV Natural Gas Section	46
11	Test Period & Pro Forma Period	46
12	Revenue Requirement	48
13	Standard Commission Basis Adjustments	50
14	Pro Forma Adjustments	57
15	V Allocation Procedures	63
16	VI Other	63
17	Exhibit No. 12:	
18	Schedule 1 - Electric Revenue Requirement and	
19	Results of Operations	(pgs 1-13)
20	Schedule 2 - Natural Gas Revenue Requirement and	
21	Results of Operations	(pgs 1-9)
22		

1 I. INTRODUCTION

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

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

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

10 A. I am a 1990 graduate of Eastern Washington
11 University with a Bachelor of Arts Degree in Business
12 Administration, majoring in Accounting. That same year, I
13 passed the November Certified Public Accountant exam,
14 earning my CPA License in August 1991¹. I worked for
15 Lemaster & Daniels, CPAs from 1990 to 1993, before joining
16 the Company in August 1993. I served in various positions
17 within the sections of the Finance Department, including
18 General Ledger Accountant and Systems Support Analyst until
19 2000. In 2000, I was hired into the State and Federal
20 Regulation Department as a Regulatory Analyst until my
21 promotion to Manager of Revenue Requirements in early 2007.
22 I have also attended several utility accounting, ratemaking
23 and leadership courses.

¹Currently I keep a CPA-Inactive status with regards to my CPA license.

1 **Q. As Manager of Revenue Requirements, what are your**
2 **responsibilities?**

3 A. As Manager of Revenue Requirements, aside from
4 special projects, I am responsible for the preparation of
5 normalized revenue requirement and pro forma studies for
6 the various jurisdictions in which the Company provides
7 utility services. During the last nine and one-half years,
8 I have assisted or led the Company's electric and/or
9 natural gas general rate filings in Idaho, Washington, and
10 Oregon.

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

13 A. My testimony and exhibits in this proceeding will
14 generally cover accounting and financial data in support of
15 the Company's need for the proposed increase in rates. I
16 will explain pro formed operating results, including
17 expense and rate base adjustments made to actual operating
18 results and rate base.

19 I incorporate the Idaho share of the proposed
20 adjustments of other witnesses in this case.

21 **Q. Are you sponsoring any exhibits to be introduced**
22 **in this proceeding?**

23 A. Yes. I am sponsoring Exhibit No. 12, Schedule 1
24 (Electric) and Schedule 2 (Natural Gas), which were
25 prepared under my direction. These exhibit schedules

1 consist of worksheets, which show actual 2009 operating
2 results (twelve-month period ending December 31, 2009), pro
3 forma, and proposed electric and natural gas operating
4 results and rate base for the State of Idaho. The exhibits
5 also show calculation of the general revenue requirement,
6 the derivation of the overall proposed rate of return, the
7 derivation of the net-operating-income-to-gross revenue-
8 conversion factor, and the specific pro forma adjustments
9 proposed in this filing.

10

11 **II. COMBINED REVENUE REQUIREMENT SUMMARY**

12 **Q. Would you please summarize the results of the**
13 **Company's pro forma study for both the electric and natural**
14 **gas operating systems for the Idaho jurisdiction?**

15 **A. Yes. After taking into account all standard**
16 **Commission Basis adjustments, as well as additional**
17 **restating, pro forma and normalizing adjustments, the pro**
18 **forma electric and natural gas rates of return (ROR) for**
19 **the Company's Idaho jurisdictional operations are 5.19% and**
20 **6.93%, respectively. Both return levels are below the**
21 **Company's requested rate of return of 8.55%. The**
22 **incremental revenue requirement for base retail rates,**
23 **necessary to give the Company an opportunity to earn its**
24 **requested ROR is \$32,114,000 for the electric operations**
25 **and \$2,575,000 for the natural gas operations. The overall**

1 base electric increase associated with the Company's
2 request is 13.98%. The base natural gas increase is 3.64%.

3 Q. What is the Company's rate of return that was
4 last authorized by this Commission for it's electric and
5 natural gas operations in Idaho?

6 A. The Company's currently authorized rate of return
7 for its Idaho operations is 8.55%, effective August 1, 2009
8 for both our electric and natural gas systems.

9

10 **III. ELECTRIC SECTION**

11 **Test Period And Pro Forma Period**

12 Q. On what test period and pro forma period is the
13 Company basing its need for additional electric revenue?

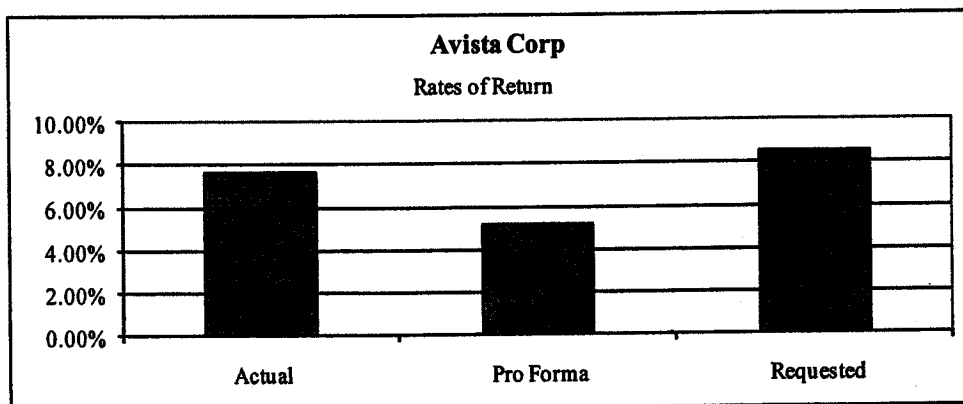
14 A. The test period being used by the Company is the
15 twelve-month period ending December 31, 2009, presented on
16 a pro forma basis. Currently authorized rates were based
17 upon the twelve months ending September 30, 2008 test year
18 utilized in Case No. AVU-E-09-01, adjusted on a pro forma
19 basis.

20 The pro forma period being used by the Company in this
21 proceeding is October 2010 through September 30, 2011
22 (2010/2011).

23 Q. By way of summary, could you please explain the
24 different rates of return that you will be presenting in
25 your testimony?

A. Yes. As shown in Illustration No. 1 below, there are three different rates of return that will be discussed. The actual ROR earned by the Company during the test period, the pro forma ROR determined in my Exhibit No.12, Schedule 1, and the requested ROR.

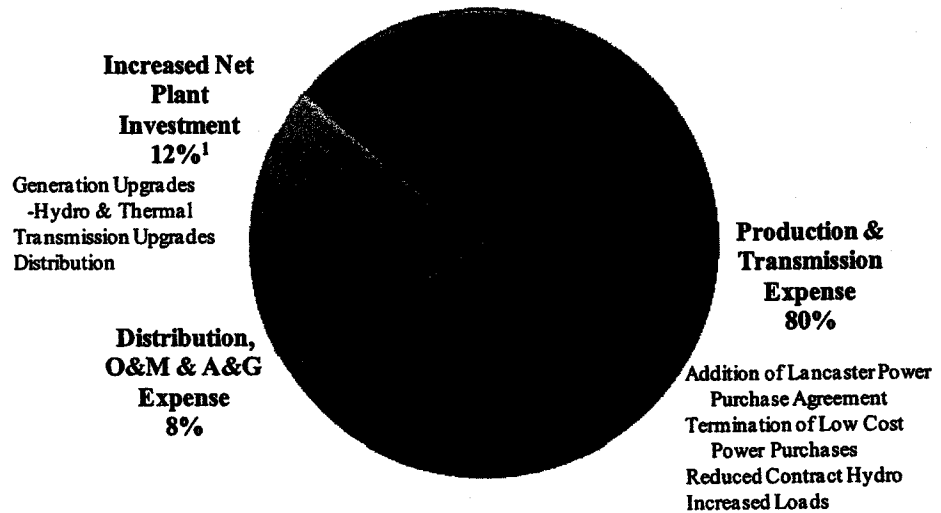
Illustration No. 1:



Q. What are the primary factors driving the Company's need for an electric increase?

A. Illustration No. 2 below, shows the primary factors driving the electric revenue requirement in this case. Additional details regarding these items are provided later in my testimony.

Illustration No. 2:
Idaho
Primary Electric Revenue Requirement Factors



¹Includes return on investment, depreciation and taxes, offset by the tax benefit of interest.

Q. Please briefly explain each of the components or segments shown in Illustration No. 2 above.

A. The first segment, representing the increases in Production and Transmission Expense, comprises approximately 80% of the overall request. The next largest segment is Increased Net Plant Investment. Net rate base for the Idaho jurisdiction increased approximately \$31.7 million, or 5.5%. The revenue requirement associated with the increase in Net Plant Investment represents approximately 12% of the overall Company request.

The remaining cost category, Distribution, O&M and A&G Expense, which includes increases to all other operating

CASE NO. AVU-E-10-01
CASE NO. AVU-G-10-01

RECEIVED

2010 APR 13 AM 10:29

IDAHO PUBLIC
UTILITIES COMMISSION

CORRECTED PAGE (8)

TO ELIZABETH M. ANDREWS DIRECT TESTIMONY

(Marked)

1 categories, such as distribution expenses, customer
2 service, and administrative and general, totals
3 approximately 8% of the overall request.

4 Q. Could you please provide additional details
5 related to the changes in Production and Transmission
6 expense?

7 A. Yes. As discussed in Company witness Mr.
8 Johnson's testimony, the level of Idaho's share of power
9 supply expense has increased by approximately \$17.6 million
10 (\$50.2 million on a system basis) from the level currently
11 in base rates.

12 The primary expense increases are the addition of the
13 Lancaster plant, from which the Company began receiving
14 power on January 1, 2010, and the expiration of four low-
15 cost power supply contracts. The increase in pro forma net
16 expense related to the inclusion of the Lancaster plant is
17 approximately \$21.3 million (system) or \$7.5 million (Idaho
18 share). With regard to the power contracts, there are four
19 low-cost 25 aMW power purchases that end December 31, 2010.
20 The cost to replace these power purchase agreements
21 increases Idaho expense by \$3.6 million. Mr. Johnson
22 discusses each of the increased expenses in detail in his
23 testimony.

1 A. Looking at the changes to "gross" plant in
2 service shows that Idaho "gross" plant increased \$63.0
3 million, as compared to what is currently included in
4 rates. To continue to meet the energy and reliability
5 needs of our customers, \$25.6 million of this increase is
6 due to the Company's investment in thermal and hydro
7 generating facilities, as well as additional transmission
8 investment. Distribution "gross" plant increased \$19.4
9 million above the current level included in rates, while
10 general and intangible "gross" plant increased \$18.0
11 million. Adjusting for accumulated depreciation and
12 amortization, accumulated deferred income taxes, and the
13 production property adjustment, the net increase to rate
14 base from these items is \$21.8 million. Lastly, the
15 Company included a working capital adjustment in this case,
16 which added \$9.9 million to the Company's total adjusted
17 rate base.

18 The specific pro forma capital expenditures undertaken
19 by the Company to upgrade its generation, transmission and
20 distribution facilities and improve operating efficiency
21 and reliability, are discussed further by Company witness
22 Mr. Storro regarding production assets, and Company witness
23 Mr. Kinney regarding transmission and distribution assets.
24 In addition to discussing the actual pro forma adjustment
25 made regarding net plant investment, Company witness Mr.

1 DeFelice also describes the general plant additions
2 included in the Company's case.

3

4 **Revenue Requirement**

5 Q. Would you please explain what is shown in Exhibit
6 No. 12, Schedule 1?

7 A. Yes. Exhibit No. 12, Schedule 1 shows actual and
8 pro forma electric operating results and rate base for the
9 test period for the State of Idaho. Column (b) of page 1
10 of Exhibit No. 12, Schedule 1 shows 2009 (twelve-month
11 ending December 31, 2009) operating results and components
12 of the average-of-monthly-average rate base as recorded;
13 column (c) is the total of all adjustments to net operating
14 income and rate base; and column (d) is pro forma results
15 of operations, all under existing rates. Column (e) shows
16 the revenue increase required which would allow the Company
17 to earn an 8.55% rate of return. Column (f) reflects pro
18 forma electric operating results with the requested
19 increase of \$32,114,000. The restating adjustments shown
20 in columns c through ai, of pages 5 through 10 of Exhibit
21 No. 12, Schedule 1, are consistent with current regulatory
22 principles and the treatment reflected in the prior
23 Commission Order in Case No. AVU-E-09-01, with a few
24 proposed changes by the Company as described in my
25 testimony below.

1 **Q. Would you please explain page 2 of Exhibit No.**
2 **12, Schedule 1?**

3 A. Yes. Page 2 shows the calculation of the
4 \$32,114,000 revenue requirement at the requested 8.55% rate
5 of return.

6 **Q. What does page 3 of Exhibit No. 12, Schedule 1**
7 **show?**

8 A. Page 3 shows the proposed Cost of Capital and
9 Capital Structure utilized by the Company in this case, the
10 weighted average cost of capital of 8.55%. Company witness
11 Mr. Thies discusses the Company's proposed rate of return
12 and the pro forma capital structure utilized in this case,
13 while Company witness Dr. Avera provides additional
14 testimony related to the appropriate return on equity for
15 Avista.

16 **Q. Would you now please explain page 4 of Exhibit**
17 **No. 12, Schedule 1?**

18 A. Yes. Page 4 shows the derivation of the net-
19 operating-income-to-gross-revenue conversion factor. The
20 conversion factor takes into account uncollectible accounts
21 receivable, Commission fees and Idaho State excise taxes.
22 Federal income taxes are reflected at 35%.

23 **Q. Now turning to pages 5 through 13 of your Exhibit**
24 **No. 12, Schedule 1, would you please explain what those**
25 **pages show?**

1 A. Yes. Page 5 begins with actual operating results
2 and rate base for the twelve-month period ending December
3 31, 2009 test period in column (b). Individual normalizing
4 and restating adjustments consistent with prior regulatory
5 treatment (standard Commission Basis adjustments) begin in
6 column (c) on page 5 and continue through column (ai) on
7 page 10. Individual pro forma adjustments begin in column
8 (PF1) on page 11 and continue through column (PF12) on page
9 13. The final column on page 13 is the total pro forma
10 operating results and rate base for the test period.
11 Additional details related to each adjustment described
12 below are provided in accompanying workpapers.

13

14 **Standard Commission Basis and Restating Adjustments**

15 Q. Would you please explain each of these
16 adjustments, the reason for the adjustment and its effect
17 on test period State of Idaho net operating income and/or
18 rate base?

19 A. Yes, the first adjustment, column (c) on page 5,
20 entitled **Deferred FIT Rate Base**, reflects the rate base
21 reduction for Idaho's portion of deferred taxes. The
22 adjustment reflects the deferred tax balances arising from
23 accelerated tax depreciation (Accelerated Cost Recovery
24 System, or ACRS, and Modified Accelerated Cost Recovery, or
25 MACRS), bond refinancing premiums, and contributions in aid

1 of construction. These amounts are reflected on the
2 average-of-monthly-average balance basis. The effect on
3 Idaho rate base is a reduction of \$94,533,000.

4 The adjustment in column (d), **Deferred Gain on Office**
5 **Building**, reflects the rate base reduction for Idaho's
6 portion of the net of tax, unamortized gain on the sale of
7 the Company's general office facility. The facility was
8 sold in December 1986 and leased back by the Company.
9 Although the Company repurchased the building in November
10 2005, the Company opted to continue to amortize the
11 deferred gain over the remaining amortization period
12 scheduled to end in December 2011. The effect on Idaho
13 rate base is a reduction of \$109,000.

14 The adjustment in column (e), **Colstrip 3 AFUDC**
15 **Elimination**, is a reallocation of rate base and
16 depreciation expense between jurisdictions. In Cause Nos.
17 U-81-15 and U-82-10, the Washington Utilities and
18 Transportation Commission (WUTC) allowed the Company a
19 return on a portion of Colstrip Unit 3 construction work in
20 progress (CWIP). A much smaller amount of Colstrip Unit 3
21 CWIP was allowed in rate base in Case U-1008-144 by the
22 IPUC. The Company eliminated the AFUDC associated with the
23 portion of CWIP allowed in rate base in each jurisdiction.
24 Since production facilities are allocated on the
25 Production/Transmission formula, the allocation of AFUDC is

1 reversed and a direct assignment is made. The rate base
2 adjustment reflects the average-of-monthly-averages amount
3 for the test period. The effect on Idaho net operating
4 income is a decrease of \$193,000. The effect of the
5 reallocation on Idaho rate base is an increase of
6 \$1,700,000.

7 The adjustment in column (f), **Colstrip Common AFUDC**,
8 is also associated with the Colstrip plants in Montana, and
9 increases rate base. Differing amounts of Colstrip common
10 facilities were excluded from rate base by this Commission
11 and the WUTC until Colstrip Unit 4 was placed in service.
12 The Company was allowed to accrue AFUDC on the Colstrip
13 common facilities during the time that they were excluded
14 from rate base. It is necessary to directly assign the
15 AFUDC because of the differing amounts of common facilities
16 excluded from rate base by this Commission and the WUTC.
17 In September 1988, an entry was made to comply with a
18 Federal Energy Regulatory Commission (FERC) Audit
19 Exception, which transferred Colstrip common AFUDC from the
20 plant accounts to Account 186. These amounts reflect a
21 direct assignment of rate base for the appropriate average-
22 of-monthly-averages amounts of Colstrip common AFUDC to the
23 Washington and Idaho jurisdictions. Amortization expense
24 associated with the Colstrip common AFUDC is charged
25 directly to the Washington and Idaho jurisdictions through

1 Account 406 and is a component of the actual results of
2 operations. The rate base adjustment reflects the average-
3 of-monthly-averages amount for the test period. The effect
4 on Idaho rate base is an increase of \$903,000.

5 The adjustment in column (g), **Kettle Falls & Boulder**
6 **Park Disallowances**, decreases rate base. The amounts
7 reflect the Kettle Falls generating plant disallowance
8 ordered by this Commission in Case No. U-1008-185 and the
9 Boulder Park plant disallowance ordered by the IPUC in case
10 No. AVU-E-04-1. This Commission disallowed a rate of
11 return on \$3,009,445 of investment in Kettle Falls, and
12 \$2,600,000 million of investment in Boulder Park. The
13 disallowed investment and related accumulated depreciation
14 are removed. These amounts are a component of actual
15 results of operations. The effect on Idaho rate base is a
16 decrease of \$2,034,000.

17 The adjustment in column (h), **Customer Advances**,
18 decreases rate base for moneys advanced by customers for
19 line extensions, as they will be recorded as contributions
20 in aid of construction at some future time. The effect on
21 Idaho rate base is a decrease of \$898,000.

22 **Q. Please turn to page 6 and explain the adjustments**
23 **shown there.**

24 **A. Page 6 starts with the adjustment in column (i),**
25 **Weatherization and DSM Investment**, which includes in rate

1 base balances (net of amortization) of weatherization
2 grants, the model conservation program costs and electric
3 demand side management (DSM) program costs upon which AFUCE
4 is no longer being accrued and amortization was implemented
5 beginning August 1994. These amounts are a component of
6 actual results of operations. The effect on Idaho rate
7 base is an increase of \$294,000.

8 **Q. Would you please explain how energy efficiency-**
9 **related expenditures impact the revenue requirement in this**
10 **case?**

11 A. Yes. The unamortized balance of energy
12 efficiency management investment incurred prior to 1995 is
13 included in the results of operations and is a rate base
14 item in the column (i) adjustment just described. DSM
15 expenditures incurred after March 13, 1995 have been offset
16 by revenues from the Company's energy efficiency tariff
17 rider, Schedule 91, and are not included in the revenue
18 requirement.

19 As the Commission is aware, the Company's tariff rider
20 under Schedule 91 was the first non-bypassable distribution
21 charge in the United States to fund energy efficiency.
22 Company witness Mr. Folsom provides additional detail and
23 addresses the prudence of the expenditures under this
24 tariff.

1 Q. Please continue with your explanation of the
2 adjustments on page 6.

3 The adjustment in column (j), **Restating CDA**
4 **Settlement**, adjusts the 2009 test period AMA net asset and
5 DFIT balances related to the 2008/2009 CDA Tribe Settlement
6 payments (Past Storage/\$10(e)) and deferred costs to a
7 2010/2011 AMA basis. In addition, this adjustment includes
8 the 2010/2011 AMA net asset and DFIT balance for the 2010
9 Past Storage/\$10e settlement payment of \$4 million. The
10 expense portion of this adjustment includes the annual
11 amortization of the net total asset (\$41.6 million (system)
12 of payments and deferred costs) and the annual \$400,000
13 (system) future storage \$10(e) payment.

14 The agreed-upon settlement and payments included in
15 this adjustment were approved by the Commission in the
16 Company's 2009 electric general rate case proceeding, Case
17 No. AVU-E-09-01. As approved by the Commission's Order
18 (See Order No. 30856), in Case No. AVU-E-09-01, the Company
19 was allowed to defer the amortization of the settlement
20 payments, which included the system payments of \$25.0
21 million in December 2008, \$10.0 million in 2009 and \$4.0
22 million in 2010 for resolution of the past trespass and
23 \$10(e) charges, and the 2008/2009 future \$10(e) annual flat
24 payment, with a carrying charge on the deferrals and
25 unamortized balance, for future recovery. These deferred

1 payments, including a return on the balance, are being
2 amortized over the average remaining life of the Spokane
3 River - Post Falls Project, or 45 years. The future \$10(e)
4 system payment schedule of \$400,000 flat annual payments
5 for the first 21 years of the new Spokane River license,
6 starting in December 2008, and \$700,000 flat annual
7 payments for the remaining years of the license, was also
8 approved.

9 During 2009, Idaho's share of the January through July
10 amortization of the assets associated with the 2008/2009
11 past storage and \$10(e) charges were deferred for future
12 recovery (see adjustment (k) "Restating CDA Settlement
13 Deferral"). The effect on Idaho net operating income is a
14 decrease of \$197,000. The effect on Idaho rate base is a
15 decrease of \$17,000 from that in the test period.

16 The adjustment in column (k), **Restating CDA Settlement**
17 **Deferral**, adjusts the 2009 test period net assets
18 associated with the 2008/2009 past storage and \$10(e)
19 charges deferred for future recovery to a 2010/2011 AMA
20 basis, and records the annual amortization expense based on
21 a three-year amortization. As noted above in adjustment
22 (k) "Restating CDA Settlement" the Company was allowed to
23 defer the amortization of the settlement payments (\$35.8
24 million of 2008/2009 system total payments), with a
25 carrying charge on the deferrals and unamortized balance,

1 for future recovery. These deferred payments, including a
2 return on the balance, are being amortized over 45 years.
3 Idaho's share of the 2009 deferred amortization, plus
4 interest totaled approximately \$317,318. The Company has
5 proposed a three-year amortization for recovery of this
6 amount, resulting in approximately \$103,000 of annual
7 expense (rather than \$7,000 annually over the remaining 44-
8 year life). The effect on Idaho net operating income is a
9 decrease of \$65,000. The effect on Idaho rate base is an
10 increase of \$168,000.

11 The adjustment in column (l), **Restating CDA/SRR**
12 **(Spokane River Relicensing) CDR**, adjusts the 2009 net
13 assets associated with the CDA Tribe settlement 4(e)
14 Spokane River relicensing conditions to a 2010/2011 AMA
15 basis. The expense portion of this adjustment includes the
16 annual amortization of the net total asset (\$12 million
17 (system) of payments) and the annual \$2 million (system) of
18 Coeur d'Alene Reservation Trust Restoration Fund (CDR)
19 payment expense. The effect on Idaho net operating income
20 is a decrease of \$484,000. The effect on Idaho rate base is
21 an increase of \$400,000.

22 The adjustment in column (m), **Restating Spokane River**
23 **Relicensing**, adjusts the 2009 net asset and DFIT balances
24 related to the Spokane River relicensing costs to a
25 2010/2011 AMA basis, and records the annual amortization

1 expense based on a 50-year amortization. In June 2009,
2 Avista received its 50 year FERC-issued license for the
3 Spokane River Project, at which time the costs of these
4 efforts were transferred to intangible plant. Costs
5 associated with this effort included actual life-to-date
6 expenditures from April 2001 through June 30, 2009. The
7 total of these costs were approved by the Commission in the
8 Company's 2009 electric general rate case proceeding, Case
9 No. AVU-E-09-01. The Company was allowed to defer the
10 amortization of the licensing costs and the costs
11 associated with the CDA Tribe settlement 4(e) relicensing
12 conditions, including a carrying charge on these amounts,
13 until rates went into effect August 1, 2009. The Company
14 was also allowed to defer 2010 (January through June)
15 associated Program, Enhancement & Mitigation (PM&E)
16 charges, including a carrying charge on these amounts,
17 until rates went into effect in the next general rate case.
18 The 2009 deferred payments, including a return on the
19 balance, were originally planned to be amortized over the
20 life of the license, or 50 years. During 2009, Idaho's
21 share of the amortization of the assets associated with the
22 licensing costs and 4(e) payments for the period June
23 through July were deferred for future recovery (see
24 adjustment (n) "Restating Spokane River Deferral. The
25 Company also plans to spend approximately \$467,700 (Idaho's

1 share) on PM&E costs in the first half of 2010; deferring
2 100% of Idaho's share, including interest, for future
3 recovery (see adjustment (o) "Restating Spokane River PM&E
4 Deferral"). The effect on Idaho net operating income is a
5 decrease of \$75,000. The effect on Idaho rate base is a
6 decrease of \$459,000 from that in the test period.

7 The adjustment in column (n), **Restating Spokane River**
8 **Deferral**, adjusts the 2009 net asset and DFIT balances
9 related to the Spokane River deferred relicensing costs to
10 a 2010/2011 AMA basis, and records the annual amortization
11 expense based on a three-year amortization. As noted above
12 in adjustment (m) "Restating Spokane River Relicensing,"
13 the Company was allowed to defer the amortization of the
14 licensing costs and costs associated with the CDA Tribe
15 settlement 4(e) relicensing conditions, including a
16 carrying charge on these amounts, for future recovery.
17 Idaho's share of the 2009 deferred amortization, plus
18 interest for the period June through July totaled \$59,335.
19 These deferred payments, including a return on the balance,
20 were originally planned to be amortized over the life of
21 the license, or 50 years. However, the Company has
22 included a three-year amortization for recovery of this
23 amount, resulting in approximately \$19,000 of annual
24 expense (rather than \$1,200 annually over the remaining 50-
25 year life). The effect on Idaho net operating income is a

1 decrease of \$12,000. The effect on Idaho rate base is an
2 increase of \$32,000.

3 **Q. Please turn to page 7 and explain the adjustments**
4 **shown there.**

5 A. Page 7 starts with the adjustment in column (o),
6 **Restating Spokane River PM&E Deferral**, records the net
7 asset and DFIT balances related to the planned 2010
8 (January through June) Spokane River deferred PM&E costs to
9 a 2010/2011 AMA basis, and records the annual amortization
10 expense based on a three-year amortization. As noted above
11 in adjustment (m) "Restating Spokane River Relicensing,"
12 the Company was allowed to defer the Spokane River deferred
13 PM&E charges, including a carrying charge on these amounts,
14 for future recovery. Idaho's share of the 2010 deferred
15 PM&E costs (Jan through June), plus interest, total
16 approximately \$467,700. The Company has included a three-
17 year amortization for recovery of this amount, resulting in
18 approximately \$147,000 of annual expense. The effect on
19 Idaho net operating income is a decrease of \$100,000. The
20 effect on Idaho rate base is an increase of \$253,000.

21 The adjustment in column (p), **Restating Montana**
22 **Riverbed Lease**, includes the costs associated with the
23 Montana Riverbed lease settlement. In this settlement, the
24 Company agreed to pay the State of Montana \$4.0 million
25 annually beginning in 2007, with annual inflation

1 adjustments, for a 10-year period for leasing the riverbed
2 under the Noxon Rapids Project and the Montana portion of
3 the Cabinet Gorge Project. The first two annual payments
4 were deferred by Avista as approved in Case No. AVU-E-07-
5 10. In Case No. AVU-E-08-01 (see Order No. 30647), the
6 Commission approved the Company's accounting treatment of
7 the deferred payments, including accrued interest, to be
8 amortized over the remaining eight years of the agreement
9 starting October 1, 2008. This adjustment includes one-
10 eighth of the deferred balance amortization and the
11 adjustment to lease payment expense for the additional
12 annual inflation. This adjustment decreases Idaho net
13 operating income by \$28,000 and increases rate base by
14 \$1,289,000.

15 The next column marked by a dash, entitled **Subtotal**
16 **Actual** represents actual operating results and rate base
17 plus standard rate base adjustments that are included in
18 Commission Basis reporting, plus additional restating
19 adjustments required to annualize previous approved rate
20 base items.

21 The adjustment in column (q), **Eliminate B & O Taxes**,
22 eliminates the revenues and expenses associated with local
23 business and occupation (B & O) taxes, which the Company is
24 passes through to its Idaho customers. The adjustment
25 eliminates any timing mismatch that exists between the

1 revenues and expenses by eliminating the revenues and
2 expenses in their entirety. B & O taxes are passed through
3 on a separate schedule, which is not part of this
4 proceeding. The effect of this adjustment is to decrease
5 Idaho net operating income by \$7,000.

6 The adjustment in column (r), **Property Tax**, restates
7 the test period accrued levels of property taxes to the
8 most current information available and eliminates any
9 adjustments related to the prior year. This adjustment
10 also annualizes the increase in property taxes effective
11 July 1, 2009, related to the Company's Coyote Springs plant
12 located in Oregon. Prior to July 1, 2009, the Company had
13 been exempted from this property tax assessment for five
14 years under a tax abatement as a result of the plant being
15 located in the Columbia River Enterprise Zone in Oregon.
16 The effect of this particular adjustment is to decrease
17 Idaho net operating income by \$617,000.

18 The adjustment in column (s), **Uncollectible Expense**,
19 restates the accrued expense to the actual level of net
20 write-offs for the test period. The effect of this
21 adjustment is to decrease Idaho net operating income by
22 \$110,000.

23 **Q. Please turn to page 8 and explain the adjustments**
24 **shown there.**

1 A. The adjustment in column (t), **Regulatory Expense**,
2 restates recorded 2009 regulatory expense to reflect the
3 IPUC assessment rates applied to expected revenues for the
4 2009 period and the actual levels of FERC fees paid during
5 the test period. The effect of this adjustment is to
6 decrease Idaho net operating income by \$27,000.

7 The adjustment in column (u), **Injuries and Damages**, is
8 a restating adjustment that replaces the accrual with the
9 six-year rolling average of actual injuries and damages
10 payments not covered by insurance. A six-year rolling
11 average and the reserve method of accounting for injuries
12 and damages, net of insurance proceeds, is a practical
13 methodology to deal with these normal utility operating
14 expenses that happen to occur on an irregular basis and
15 differ markedly in materiality. This methodology was
16 accepted by the Idaho Commission in Case No. WWP-E-98-11.
17 The effect of this adjustment is to increase Idaho net
18 operating income by \$47,000.

19 The adjustment in column (v), **FIT**, adjusts the FIT
20 calculated at 35% within Results of Operations by removing
21 the effect of certain Schedule M items, matching the
22 jurisdictional allocation of other Schedule M items to
23 related Results of Operations allocations and adjusts the
24 appropriate level of production tax credits and income tax
25 credits on qualified generation. The net FIT and

1 production tax credit adjustments decrease Idaho net
2 operating income by \$514,000. Adjusting for the proper
3 level of deferred tax expense for the test period decreases
4 Idaho net operating income by \$3,000. This adjustment also
5 reflects the proper level of amortized income tax credit
6 for the test period increasing Idaho net operating income
7 by an additional \$15,000. Therefore, the net effect of
8 this adjustment, all based upon a Federal tax rate of 35%,
9 is to decrease Idaho net operating income by \$502,000.

10 The adjustment in column (w), **Idaho PCA**, removes the
11 effects of the financial accounting for the Power Cost
12 Adjustment (PCA). The PCA normalizes and defers certain
13 power supply costs on an ongoing basis between general rate
14 filings. Certain differences in actual power supply costs,
15 compared to those included in base retail rates are
16 deferred and then surcharged or rebated to customers in a
17 future period. Revenue adjustments due to the PCA and the
18 power cost deferrals affect actual results of operations
19 and need to be eliminated to produce a normal period.
20 Actual revenues and power supply costs are normalized in
21 adjustments in column (w) and column (PF1), respectively.
22 The effect of this adjustment is to decrease Idaho net
23 operating income by \$11,690,000.

24 The adjustment in column (x), **Nez Perce Settlement**
25 **Adjustment**, reflects a decrease in production operating

1 expenses. An agreement was entered into between the
2 Company and the Nez Perce Tribe to settle certain issues
3 regarding earlier owned and operated hydroelectric
4 generating facilities of the Company. This adjustment
5 directly assigns the Nez Perce Settlement expenses to the
6 Washington and Idaho jurisdictions. This is necessary due
7 to differing regulatory treatment in Idaho Case No. WWP-E-
8 98-11 and Washington Docket No. UE-991606. The effect of
9 this adjustment is to increase Idaho net operating income
10 by \$10,000.

11 The adjustment in column (y), **Eliminate A/R Expenses**,
12 removes expenses associated with the sale of customer
13 accounts receivable. The effect of this adjustment is to
14 increase Idaho net operating income by \$104,000.

15 **Q. Please continue on page 10 with your explanation**
16 **of the adjustments.**

17 A. The first adjustment on page 10 in column (z),
18 **Revenue Normalization Adjustment**, is an adjustment taking
19 into account known and measurable changes that include
20 revenue repricing (including the current authorized rates
21 approved in Case No. AVU-E-09-01), weather normalization
22 and a recalculation of unbilled revenue. Schedule 91
23 Tariff Rider and Schedule 59 Residential Exchange are
24 excluded from pro forma revenues, and the related
25 amortization expense is eliminated as well. Company

1 witness Ms. Knox is sponsoring this adjustment. The effect
2 of this particular adjustment is to increase Idaho net
3 operating income by \$3,620,000.

4 The adjustment in column (aa), **Miscellaneous Restating**
5 **Adjustments**, removes a number of non-operating or non-
6 utility expenses associated with advertising, dues and
7 donations included in error in the test period actual
8 results. The effect of this adjustment is to increase
9 Idaho net operating income by \$38,000.

10 The adjustment in column (ab), **Colstrip Mercury**
11 **Emission O&M**, includes Idaho's share of the annual O&M
12 expense of approximately \$.5 million (\$1.4 million system)
13 associated with the mercury control project at Colstrip
14 planned during the 2010/2011 rate year. This adjustment is
15 consistent with the determination of the Commission
16 approved annual level of expense in Case No. AVU-E-09-01.
17 This adjustment decreases Idaho net operating income by
18 \$308,000.

19 The adjustment in column (ac), **Restating CS2 Levelized**
20 **Adjustment**, adjusts the deferred return amounts related to
21 Coyote Springs 2 (CS2) to the amounts that will be recorded
22 during the rate year. In the Company's electric general
23 rate case, Case No. AVU-E-04-1, Order No. 29602, dated
24 October 8, 2004, the Commission approved the deferral of
25 return on CS2 investment in early years for recovery in

1 later years in order to levelize the revenue requirement on
2 CS2 plant investment for the first ten years of operation
3 of the plant. The ten-year period runs from September 1,
4 2004 through August 31, 2014. This adjustment restates the
5 test period amount of amortization expense, inclusive of
6 the carrying charge on the deferred return, to the amount
7 that will be recorded in the rate year. The change in
8 deferred income tax expense from the test period to the
9 rate period is also reflected. This adjustment reduces net
10 operating income by \$144,000.

11 The adjustment in column (ad), **Restating Wartsila**
12 **Amortization**, reflects a five-year amortization of the
13 estimated unrecovered investment in two 4 MW reciprocating
14 engine generators originally planned to be installed at
15 Boulder Park, a small natural gas-fired generating
16 facility. During the period December 2004 through February
17 2005 Avista and Commission Staff discussed possible
18 accounting treatment related to the planned sale of the
19 Wartsila units. In February 2005 the Staff indicated by
20 letter that it would support a five-year amortization of
21 the unrecovered costs, with no return on the unamortized
22 balance, and that the inclusion of the amortization expense
23 in rates would be addressed in a future proceeding.

24 In 2008 a buyer agreed to purchase the units for net
25 proceeds to the Company of \$1 million, as compared to the

1 book value of \$3.65 million. However, the buyer defaulted
2 and only one unit was delivered with net proceeds to the
3 Company of \$670,000. The second unit remains unsold and
4 the five-year amortization amount in the adjustment assumes
5 that the second unit will be sold for the \$330,000.

6 In Case No. AVU-E-09-01 the Idaho Commission approved
7 the accounting treatment of the five-year amortization
8 starting in August 1, 2009 through July 31, 2014. This
9 adjustment restates the test period expense amount (5
10 months) to an annual or 12 month level of amortization
11 expense amount. This adjustment decreases Idaho net
12 operating income by \$69,000.

13 **Q. Please continue on page 10 with your explanation**
14 **of the adjustments.**

15 A. The adjustment in column (ae), **Restating Colstrip**
16 **Lawsuit Settlement**, reflects a two-year amortization of the
17 Company's share of the lawsuit settlement amount. On May
18 22, 2008, the Company filed an application seeking an
19 accounting order to defer the settlement payment. On
20 September 12, 2008, the Commission authorized deferred
21 accounting treatment in Order No. 30638, Case No. AVU-E-08-
22 03. In Case No. AVU-E-09-01 the Idaho Commission approved
23 the two-year amortization treatment proposed by the Company
24 starting in August 1, 2009 through July 31, 2011. This
25 adjustment restates the test period expense amount (5

1 months) to the remaining 2010/2011 rate period amount (10
2 months remaining through July 31, 2011) of amortization
3 expense amount. This adjustment decreases Idaho net
4 operating income by \$99,000.

5 The adjustment in column (af), **Restating Chicago**
6 **Climate Exchange**, removes the effect in the test period of
7 amortization revenue included related to the expiration of
8 the two-year amortization of the Chicago Climate Exchange
9 approved in AVU-08-01. In AVU-08-01 the IPUC approved a
10 two-year amortization of the other revenue included in
11 Idaho's share of the revenues, net of expenses, from the
12 sales of Carbon Financial Instruments (CFIs) on the Chicago
13 Climate Exchange. In Order No. 30647 (Case No. AVU-E-08-
14 01), the Commission approved the amortization of the net
15 revenues over a two-year period beginning in October 2008
16 through September 2010. This adjustment decreases Idaho
17 net operating income by \$272,000.

18 The adjustment in column (ag), **Operation & Maintenance**
19 **(O&M) Savings**, includes a reduction to expense for
20 anticipated operation and maintenance savings expected
21 during the pro forma period, as compared to the 2009 test
22 period. These O&M savings include reductions related to
23 certain additional generation, transmission, distribution
24 and general plant investment included in the 2009 and 2010
25 capital additions adjustments, and other operation

1 efficiencies that were identified. (These savings are in
2 addition to the offset included as a result of the
3 production/transmission property adjustment described
4 below). The savings related to capital projects have been
5 discussed further within Mr. Storro's (generation
6 projects), Mr. Kinney's (distribution and transmission
7 projects), and Mr. DeFelice 's (general plant) direct
8 testimony. Additional detail can be found within my
9 workpapers included with the Company's filing. This
10 adjustment increases Idaho net operating income by
11 \$124,000.

12 The adjustment in column (ah), **Working Capital**,
13 increases total rate base for the Company's working capital
14 adjustment. The Company has calculated cash working
15 capital in this proceeding on the basis of the "1/8 of O&M"
16 formula (also known as the Federal Energy Regulatory
17 Commission's "one-eighth" formula or "45 day" method).
18 This methodology divides Idaho total O&M expenses (less
19 fuel: accounts 501 and 547; and purchased power expenses:
20 account 555) by eight, the approximate number of 45 day
21 periods within a year. FERC's use of 45 days represents an
22 estimate of days that elapse between payments for operating
23 expenses associated with providing service to customers and
24 receiving payment from customers. Since investors supply
25 the funds to finance operations during this lag period, it

1 is appropriated to provide a return on those working
2 capital funds. The Company believes that this methodology,
3 given the complexities of a multi-state, multi service
4 utility such as Avista is a reasonable approach for
5 calculating an individual state and service working capital
6 adjustment. The effect on Idaho rate base is an increase
7 of \$9,863,000.

8 The adjustment in the column (ai) **Restate Debt**
9 **Interest**, restates debt interest using the Company's pro
10 forma weighted average cost of debt, as outlined in the
11 testimony and exhibits of Mr. Theis, and applied to Idaho's
12 pro forma level of rate base. This produces a pro forma
13 level of tax deductible interest expense. The Federal
14 income tax effect of the restated level of interest for the
15 test period decreases Idaho net operating income by
16 \$65,000.

17 The column entitled **Restated Total**, subtotals all the
18 preceding columns (b) through column (ai), excluding the
19 subtotal column. These totals represent actual operating
20 results and rate base plus the standard normalizing
21 adjustments that the Company includes in its Commission
22 Basis adjustments except power supply².

23

² The restated total also includes an increase in expense necessary to annualize certain 2009 expenses included in the test period, (i.e. Colstrip mercury emission expense, Montana riverbed lease, Spokane River and CDA Tribe Settlement expense.)

1 **Pro Forma Adjustments**

2 **Q. Please explain the significance of the 12 columns**
3 **subsequent to the column entitled Restated Total that**
4 **begins at page 11 in your Exhibit No. 12, Schedule 1.**

5 **A. The adjustments subsequent to the Restated Total**
6 **column are pro forma adjustments that recognize the**
7 **jurisdictional impacts of items that will impact the pro**
8 **forma operating period levels for known and measurable**
9 **changes. They encompass revenue and expense items as well**
10 **as additional capital projects. These adjustments bring**
11 **the operating results and rate base to the final pro forma**
12 **level for the test year.**

13 **Q. Please continue with your explanation of the**
14 **adjustments starting on page 11, subsequent to the Restated**
15 **Total column.**

16 **A. The adjustment in column (PF1), Pro Forma Power**
17 **Supply, was made under the direction of Mr. Johnson and is**
18 **explained in detail in his testimony. This adjustment**
19 **includes pro forma power supply related revenue and**
20 **expenses to reflect the twelve-month period October 1, 2010**
21 **through September 30, 2011. Mr. Johnson's testimony**
22 **outlines the system level of pro forma power supply details**
23 **that are included in this adjustment. This adjustment**
24 **calculates the Idaho jurisdictional share of those figures**
25 **included in the base Results of Operations. The net effect**

1 of the power supply adjustments decreases Idaho net
2 operating income by \$6,612,000.

3 The adjustment in column (PF2), **Pro Forma Production**
4 **Property Adjustment**, adjusts pro formed production and
5 transmission revenues, expenses, and rate base by a factor
6 that reflects the percentage increase of the pro forma
7 period Idaho retail load above the 2009 Idaho test year
8 retail load. Capital additions have been pro formed to
9 December 2010 whereas the remainder of the pro forma
10 adjustments reflect costs for the twelve months ended
11 September 2011 level. Therefore a factor reflecting 2010
12 calendar Idaho retail load was used to determine the factor
13 for pro formed capital costs and the 2010/2011 rate year
14 Idaho retail load was used to determine the factor for all
15 other pro formed production and transmission costs. The
16 adjustment is made to avoid the over-recovery of pro formed
17 production and transmission costs, since the revenue
18 requirement associated with those costs is being spread to
19 test year retail load. The use of a production property
20 adjustment, in conjunction with pro forma rate year loads
21 for power supply, results in a better matching of revenues
22 and expenses during the period that new retail rates from
23 the case will be in effect. The effect of this adjustment
24 on Idaho net operating income is an increase of \$2,391,000.
25 The effect on Idaho rate base is a decrease of \$4,853,000.

1 The adjustment in column (PF3), **Pro Forma Labor-Non-**
2 **Exec**, reflects known and measurable changes to test period
3 union and non-union wages and salaries, excluding executive
4 salaries, which are handled separately in adjustment PF4.
5 For non-union employees, test period wages and salaries are
6 restated to include the March 2010 overall actual increase
7 of 2.8%, and seven months of the planned March 2011
8 increase of 2.4%. The Company's Board is scheduled to
9 address the 2011 planned increase at the Board of
10 Director's meeting in May 2010.

11 Also included in this adjustment are the 2010 and 2011
12 (seven months) union contract increases currently being
13 negotiated. The Company anticipates a final union contract
14 agreement will be completed by the end of second quarter of
15 2010. The methodology behind this adjustment is consistent
16 with that used in Case No. AVU-E-09-01. The effect of this
17 adjustment on Idaho net operating income is a decrease of
18 \$549,000.

19 The adjustment in column (PF4), **Pro Forma Labor-**
20 **Executive**, reflects known and measurable changes to
21 executive compensation, restating executive compensation
22 test period salary expense to actual salary levels at 2010.
23 This adjustment takes into account changes in compensation
24 for the executive team in 2010 only. Although the officers
25 did not receive a 2009 pay increase, this adjustment does

1 reflect an annual increase for the actual overall 2010
2 officer increase of 2.86%. Compensation costs for non-
3 utility operations are excluded, as executives routinely
4 charge a portion of their time to non-utility operations,
5 commensurate with the amount of time spent on such
6 activities, based on a survey of each executive. The
7 methodology behind this adjustment is consistent with that
8 used in the last general case, Case No. AVU-E-09-01. The
9 impact of this adjustment on Idaho net operating income is
10 a decrease of \$55,000.

11 The adjustment in column (PF5), **Pro Forma Transmission**
12 **Rev/Exp**, was made under the direction of Mr. Kinney and is
13 explained in detail in his testimony. This adjustment
14 includes pro forma transmission-related revenues and
15 expenses to reflect the twelve-month period October 31,
16 2010 through September 30, 2011. As described by Mr.
17 Kinney, this adjustment includes, among other things, the
18 increase in revenue as a result of the recently-concluded
19 FERC transmission rate case. The net effect of the
20 transmission revenue and expense adjustments increases
21 Idaho net operating income by \$604,000.

22 The adjustment in column (PF6), **Pro Forma Capital**
23 **Additions 2009**, pro forms in the capital cost and expenses
24 associated with adjusting the twelve-month ending December
25 2009 average-monthly-average plant related balances to end-

1 of-period balances for plant in service at December 31,
2 2009. The capital costs have been included for the
3 December 31, 2009 pro forma period with the associated
4 depreciation expense and property tax, as well as the
5 appropriate accumulated depreciation and deferred income
6 tax rate base offsets. This adjustment was made under the
7 direction of Mr. DeFelice and is described further in his
8 testimony. This adjustment is also consistent with that
9 approved in the most recent Idaho general rate case
10 proceeding, Case No. AVU-E-09-01, which approved the
11 Company's expected net rate base balance as of December 31,
12 2009. The Production Property Adjustment is also applied
13 to the production and transmission components of these
14 additions as discussed further above. This adjustment
15 decreases Idaho net operating income by \$881,000 and
16 increases rate base by \$16,402,000.

17 **Q. Please turn to page 12 and explain the**
18 **adjustments shown there.**

19 **A.** The adjustment in column (PF7), **Pro Forma Capital**
20 **Additions 2010**, pro forms in the capital cost and expenses
21 associated with capital expenditures for 2010. This
22 adjustment includes projects expected to be completed and
23 transferred to plant-in-service by December 31, 2010, and
24 thus were normalized to reflect annual amounts. The
25 capital costs have been included for the appropriate pro

1 forma period with the associated depreciation expense and
2 property tax, as well as the appropriate accumulated
3 depreciation and deferred income tax rate base offsets.
4 This adjustment also reduces the 2009 vintage plant net
5 rate base (including accumulated depreciation and deferred
6 FIT) to an end of period December 31, 2010 adjusted
7 balance. This adjustment was also made under the direction
8 of Mr. DeFelice and is described further in his testimony.
9 The Production Property Adjustment is also applied to the
10 production and transmission components of these additions
11 as discussed further by above. This adjustment decreases
12 Idaho net operating income by \$1,598,000 and increases rate
13 base by \$8,310,000.

14 The adjustment in column (PF8), **Pro Forma Noxon**
15 **Generation 2010 & 2011**, pro forms in the Noxon capital
16 projects planned for completion in April 2010 and April
17 2011. As explained further by Mr. Storro, Noxon Unit #3 is
18 scheduled to have a new turbine and complete mechanical
19 overhaul between August 2009 and April 2010. These unit
20 upgrades are planned to increase unit efficiency and boost
21 unit ratings. The additional generation from the Noxon
22 Unit #2 completion planned for April of 2011 has also been
23 included in the Aurora Dispatch Model for the rate year, as
24 discussed by Company witness Mr. Kalich. Including the
25 additional generation from this Noxon upgrade in the

1 Dispatch Model, ultimately reducing power supply expenses
2 for customers in the 2010/2011 rate year, and including
3 this project in rate base for the rate period provides a
4 proper match in revenues with expenses for this project.
5 The Noxon Unit #2 project was included in rate base and
6 within the Aurora model at 50% of the cost and generation
7 (equivalent to 6 months due to an April 1, 2011 effective
8 date). This adjustment decreases Idaho net operating
9 income by \$97,000 and increases rate base by \$4,362,000.

10 The adjustment in column (PF9), **Pro Forma Information**
11 **Services**, pro forms in the administrative and general (A&G)
12 expenses associated with incremental changes for
13 information services costs planned for 2010 and 2011 above
14 test period levels. As explained by Mr. Kensok, these
15 incremental costs include increases in expenses for
16 supporting applications utilized by the Company, additional
17 required security and compliance requirements, and
18 additional dollars required for hosting fees, application
19 fees, software maintenance and license fees. This
20 adjustment decreases Idaho net operating income by
21 \$831,000.

22 The adjustment in column (PF10), **Pro Forma Employee**
23 **Benefits**, adjusts for changes in both the Company's pension
24 and medical insurance expense and increases Idaho net
25 operating income by \$206,000.

1 Q. Please describe the pension expense portion of
2 the Employee Benefits adjustment and Idaho's share of this
3 expense.

4 A. The Company's pension expense portion of this
5 adjustment is determined in accordance with Financial
6 Accounting Standard 87 (FAS-87), and has decreased on a
7 system basis from \$24.2 million for the actual test year
8 costs for the twelve months ended December 31, 2009, to
9 \$19.7 million for 2010. At this time the amounts included
10 in this case are estimated with the most current available
11 data. Preliminary Pension expense is determined by an
12 outside actuarial firm, in accordance with FAS-87, and
13 provided to the Company late in the first quarter of each
14 year. These calculations and assumptions are reviewed by
15 the Company's outside accounting firm annually for
16 reasonableness and comparability to other companies. Due
17 to the timing of this report, additional information may
18 become known during the course of these proceedings that
19 may require a modification to this adjustment.

20 The decrease in pension expense is due primarily to
21 the investment performance of plan assets during the past
22 year. In addition, the Pension Protection Act (PPA) of
23 2006 requires companies to annually increase the funding
24 level of their pension plans in order to eventually achieve

1 a fully-funded plan, which also impacts the plan asset
2 balance and level of expense.

3 **Q. Please now describe the medical insurance expense**
4 **portion of the Employee Benefits adjustment and Idaho's**
5 **share of this expense.**

6 A. The Company's medical insurance expense portion
7 of this adjustment adjusts for the medical insurance costs
8 planned for 2010 above the test period. Medical insurance
9 expense has increased on a system basis from \$16.9 million
10 for the actual test year costs for the twelve months ended
11 December 31, 2009, to \$19.1 million for 2010. This
12 increased cost is mainly due to increased large claims
13 activity driven by various diagnostic categories such as
14 cancer and heart disease, and an increase in the average
15 age of our membership.

16 Avista has taken measures to directly decrease its
17 self-funded plan costs. These measures include increasing
18 the stop loss insurance reimbursement level, which
19 decreases the premium expense with Avista's third party
20 administrator. Avista also negotiated a new contract with
21 its prescription benefit administrator and its third party
22 administrator (TPA) to pass through the drug manufacturer
23 rebates (in the past these rebates were left with the TPA.)
24 The Company also converted the Dental plan to a Preferred
25 Provider Organization (PPO) program that provides savings

1 to the participant similar to medical plans with a PPO
2 program. In addition to these measures, over the past five
3 years the Company made changes to co-pay levels and out of
4 pocket maximums to help reduce plan costs. The Benefits
5 Planning and Administrative Committee constantly seek
6 opportunities for benefit program changes that will reduce
7 costs.

8 The net impact of the decrease in pension and the
9 increase in medical costs is a net decrease in expense of
10 \$317,000.

11 **Q. Please continue your explanation of the**
12 **adjustment columns on page 12.**

13 **A. The adjustment in Column (PF11), Pro Forma**
14 **Insurance**, adjusts the test period insurance expense for
15 general liability, directors and officers (D&O) liability,
16 and property to the actual cost of insurance policies that
17 are in effect for 2010. Costs of system-wide insurance
18 policies for 2010 were slightly above costs for policies in
19 2009, due to increased costs in general liability
20 insurance. Insurance costs that are properly charged to
21 non-utility operations have been excluded from this
22 adjustment. This adjustment decreases Idaho net operating
23 income by \$47,000.

24 **Q. Please turn to page 13 and explain the**
25 **adjustments shown there.**

1 A. The adjustment in column (PF12), **Pro Forma Clark**
2 **Fork/Spokane River Relicensing PM&E**, adjusts the level of
3 expense included in the test period for the Clark Fork and
4 Spokane River Protection, Mitigation, and Enhancement
5 (PM&E) expenses, to the Company's planned expenditures for
6 2010 required by the Company's licensing of those dams.
7 Mr. Storro discusses the additional level of planned PM&E
8 expenditures further. The effect of this adjustment is to
9 decrease Idaho net operating income by \$698,000.

10 The last column, **Pro Forma Total**, reflects total pro
11 forma results of operations and rate base consisting of
12 test period actual results (twelve-months ending December
13 31, 2009) and the total of all adjustments.

14 **Q. Referring back to page 1, line 42, of Exhibit No.**
15 **12, Schedule 1, what was the actual and pro forma electric**
16 **rate of return realized by the Company during the test**
17 **period?**

18 A. For the State of Idaho, the actual test period
19 rate of return was 7.62%. The pro forma rate of return is
20 5.19% under present rates. Thus, the Company does not, on
21 a pro forma basis for the test period, realize the 8.55%
22 rate of return requested by the Company in this case.

23 **Q. How much additional net operating income would be**
24 **required for the State of Idaho electric operations to**

1 allow the Company an opportunity to earn its proposed 8.55%
2 rate of return on a pro forma basis?

3 A. The net operating income deficiency amounts to
4 \$20,449,000, as shown on line 5, page 2 of Exhibit No. 12,
5 Schedule 1. The resulting revenue requirement is shown on
6 line 7 and amounts to \$32,114,000, or an increase of 13.98%
7 over pro forma general business revenues.

8

9 **IV. NATURAL GAS SECTION**

10 **Test Period And Pro Forma Period**

11 Q. On what test period and pro forma period is the
12 Company basing its need for additional natural gas revenue?

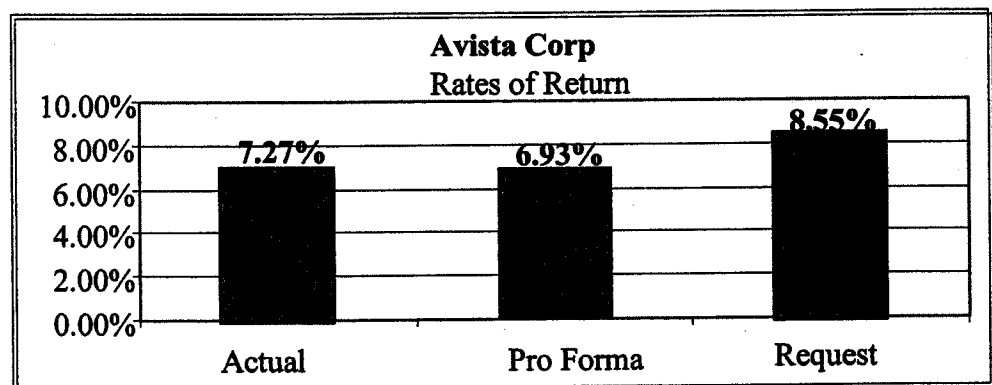
13 A. The test period being used by the Company is the
14 twelve-month period ending December 31, 2009, presented on
15 a pro forma basis. Currently authorized rates are based
16 upon the twelve-months ended September 30, 2008 test year
17 utilized in case No. AVU-G-09-01, as adjusted on a pro
18 forma basis.

19 The pro forma period being used by the Company in this
20 proceeding is October 2010 through September 30, 2011
21 (2010/2011).

22 Q. Could you please explain the different rates of
23 return shown in your natural gas results presented in your
24 testimony?

1 A. Yes. As discussed previously in the Electric
2 Section, there are three different rates of return
3 calculated. The actual ROR earned by the Company during
4 the test period, the Pro Forma ROR determined in my Exhibit
5 No. 12, Schedule 2, and the requested ROR. For ease of
6 comparison, please refer to Illustration No. 3 below
7 depicting these results for the Natural Gas Section:

8 **Illustration No. 3:**



13

14

15 **Q. What are the primary factors driving the**
16 **Company's need for additional natural gas revenues?**

17 A. The Company's natural gas request is driven by
18 changes in various operating cost components, mainly
19 distribution operation and maintenance and administrative
20 and general expenditures. In addition, over 19% of the
21 overall increase in the requested revenue requirement is
22 due to the transfer of a portion of the Jackson Prairie
23 storage facility, from Avista Energy to Avista Utilities on
24 May 1, 2011. Company witness Mr. Christie discusses the

1 details of this project, and the plans to move it to the
2 Utility.

3 The total of the increased operating cost components
4 requested in this case causes an increase in the fixed
5 costs of providing gas service to customers. I describe
6 the pro forma adjustments included in this case later in my
7 testimony.

8

9 **Revenue Requirement**

10 **Q. Would you please explain what is shown in Exhibit**
11 **No. 12, Schedule 2?**

12 A. Yes. Exhibit No. 12, Schedule 2 shows actual and
13 pro forma gas operating results and rate base for the test
14 period for the State of Idaho. Column (b) of page 1 of
15 Exhibit No. 12, Schedule 2 shows test period operating
16 results (twelve-months ended December 31, 2009) and
17 components of the average-monthly-average rate base as
18 recorded; column (c) is the total of all adjustments to net
19 operating income and rate base; and column (d) is pro forma
20 results of operations, all under existing rates. Column
21 (e) shows the revenue increase required which would allow
22 the Company to earn an 8.55% rate of return. Column (f)
23 reflects pro forma gas operating results with the requested
24 increase of \$2,575,000.

1 **Q. Would you please explain page 2 of Exhibit No.**
2 **12, Schedule 2?**

3 A. Yes. Page 2 shows the calculation of the
4 \$2,575,000 revenue requirement at the requested 8.55% rate
5 of return.

6 **Q. What does page 3 of Exhibit No. 12, Schedule 2**
7 **show?**

8 A. Page 3 shows the proposed Cost of Capital and
9 Capital Structure utilized by the Company in this case,
10 showing the weighted average cost of capital calculation of
11 8.55%. Mr. Thies discusses the Company's proposed rate of
12 return and the pro forma capital structure utilized in this
13 case, while Company witness Dr. Avera provides additional
14 testimony related to the appropriate return on equity for
15 Avista.

16 **Q. Would you now please explain page 4 of Exhibit**
17 **No. 12, Schedule 2?**

18 A. Yes. Page 4 shows the derivation of the net-
19 operating-income-to-gross-revenue conversion factor. The
20 conversion factor takes into account uncollectible accounts
21 receivable, Commission fees and Idaho State excise taxes.
22 Federal income taxes are reflected at 35%.

23 **Q. Now turning to pages 5 through 9 of your Exhibit**
24 **No. 12, Schedule 2, would you please explain what those**
25 **pages show?**

1 A. Yes. Page 5 begins with actual operating results
2 and rate base for the test period (twelve-months ending
3 December 31, 2009) in column (b). Individual normalizing
4 adjustments consistent with prior regulatory treatment
5 (standard Commission Basis adjustments) begin in column (c)
6 on page 5 and continue through column (s) on page 7.
7 Individual pro forma and additional normalizing adjustments
8 begin in column (PF1) on page 8 and continue through column
9 (PF8) on page 9. The final column on page 9 is the total
10 pro forma operating results and rate base for the test
11 period. Additional details related to each adjustment
12 described below are provided in accompanying work papers.

13

14 **Standard Commission Basis Adjustments**

15 Q. Would you please explain each of these
16 adjustments, the reason for the adjustment and its effect
17 on test period State of Idaho net operating income and/or
18 rate base?

19 A. Yes, the restating adjustments shown in columns
20 (c) through (s) are consistent with methodologies employed
21 in our prior cases and current regulatory principles.

22 The first adjustment, column (c) on page 5, entitled
23 **Deferred FIT Rate Base**, reflects the rate base reduction
24 for Idaho's portion of deferred taxes. The adjustment
25 reflects the deferred tax balances arising from accelerated

1 tax depreciation (Accelerated Cost Recovery System, or
2 ACRS, and Modified Accelerated Cost Recovery, or MACRS),
3 bond refinancing premiums, and contributions in aid of
4 construction. These amounts are reflected on the average
5 of monthly average balance basis. The effect on Idaho rate
6 base is a reduction of \$17,318,000.

7 The adjustment in column (d), **Deferred Gain on Office**
8 **Building**, reflects the rate base reduction for Idaho's
9 portion of the net of tax, unamortized gain on the sale of
10 the Company's general office facility. The facility was
11 sold in December 1986 and leased back by the Company.
12 Although the Company repurchased the building in November
13 2005, the Company opted to continue to amortize the
14 deferred gain over the remaining amortization period
15 scheduled to end in 2011. The effect on Idaho rate base is
16 a reduction of \$36,000.

17 The adjustment in column (e), **Gas Inventory**, reflects
18 the adjustment to rate base for the average-of-monthly-
19 average value of gas stored at the Company's Jackson
20 Prairie underground storage facility through the test
21 period. The effect on Idaho rate base is an increase of
22 \$3,626,000.

23 The adjustment in column (f), **Weatherization and DSM**
24 **Investment**, includes in rate base the balance (net of
25 amortization) of company investments in natural gas demand

1 side management (DSM) program costs. These amounts are a
2 component of actual results of operations. The effect of
3 this adjustment is to increase Idaho rate base by \$152,000.

4 The adjustment in column (g), entitled **Customer**
5 **Advances**, decreases rate base for funds advanced by
6 customers for line extensions, as they are generally
7 recorded as contributions in aid of construction at some
8 future time. The effect of this adjustment on Idaho rate
9 base is a decrease of \$74,000.

10 Q. Please turn to page 6 and explain the first
11 column shown there.

12 A. The column labeled **Subtotal Actual**, is a subtotal
13 of columns (b) through (g) and reflects the standard rate
14 base adjustments.

15 The first adjustment starting on page 6 in column (h),
16 entitled **Revenue Normalization & Gas Cost Adjustment**, is an
17 adjustment taking into account known and measurable changes
18 that include revenue normalization (including the current
19 authorized rates approved in Case No. AVU-G-09-01), which
20 reprices customer usage under presently effective rates, as
21 well as weather normalization and an unbilled revenue
22 calculation. Associated gas costs are replaced with gas
23 costs computed using normalized volumes at the currently
24 effective weighted-average-cost-of-gas, or WACOG rates.
25 Revenues associated with the temporary Gas Rate Adjustment

1 Schedule 155 and Schedule 191 Tariff Rider are excluded
2 from pro forma revenues, and the related amortization
3 expenses are eliminated as well. Ms. Knox is sponsoring
4 this adjustment. The effect of this particular adjustment
5 is to decrease Idaho net operating income by \$547,000.

6 The adjustment in column (i), **Eliminate B & O Taxes**,
7 eliminates the revenues and expenses associated with local
8 business and occupation taxes, which the Company passes
9 through to customers. The adjustment eliminates any timing
10 mismatch that exists between the revenues and expenses by
11 eliminating the revenues and expenses in their entirety.
12 B & O Taxes are passed through on a separate schedule,
13 which is not part of this proceeding. The effect of this
14 adjustment is zero to Idaho net operating income.

15 The adjustment in column (j), **Property Tax**, restates
16 the test period accrued levels of property taxes to the
17 most current information available and eliminates any
18 adjustments related to the prior year. The effect of this
19 particular adjustment is to decrease Idaho net operating
20 income by \$64,000.

21 The adjustment in column (k), **Uncollectible Expense**,
22 restates the accrued expense to the actual level of net
23 write-offs for the test period. The effect of this
24 adjustment is to increase Idaho net operating income by
25 \$121,000.

1 The adjustment in column (l), entitled **Regulatory**
2 **Expense Adjustment**, restates recorded 2009 regulatory
3 expense to reflect the IPUC assessment rates applied to
4 revenues for the test period. The effect of this
5 adjustment is to increase Idaho net operating income by
6 \$10,000.

7 The adjustment in column (m), entitled **Injuries and**
8 **Damages**, is a restating adjustment that replaces the
9 accrual with the six-year rolling average of actual
10 injuries and damages payments not covered by insurance.
11 This methodology was accepted by the Idaho Commission in
12 Case No. WWP-E-98-11. The effect of this adjustment is to
13 increase Idaho net operating income by \$38,000.

14 **Q. Please turn to page 7 and explain the adjustments**
15 **shown there.**

16 A. The first adjustment on page 7 in column (n),
17 entitled **FIT**, adjusts the FIT calculated at 35% within
18 Results of Operations by removing the effect of certain
19 Schedule M items and matches the jurisdictional allocation
20 of other Schedule M items to related Results of Operations
21 allocations. This adjustment also reflects the proper
22 level of deferred tax expense for the test period. The
23 effect of this adjustment, all based upon a Federal tax
24 rate of 35%, is to increase Idaho net operating income by
25 \$8,000.

1 The adjustment in column (o), **Eliminate A/R Expenses**,
2 removes expenses associated with the sale of customer
3 accounts receivable. The effect of this adjustment is to
4 increase Idaho net operating income by \$18,000.

5 The adjustment in column (p), **Miscellaneous Restating**
6 **Adjustment**, removes a number of non-operating or non-
7 utility expenses associated with advertising, dues and
8 donations included in error in the test period actual
9 results. The effect of this adjustment is to increase
10 Idaho net operating income by \$12,000.

11 The adjustment in column (q), **Operation & Maintenance**
12 **(O&M) Savings**, includes a reduction to expense for
13 anticipated operation and maintenance savings expected
14 during the pro forma period, as compared to the 2009 test
15 period. These O&M savings include reductions related to
16 certain additional general plant investment included in the
17 capital additions adjustments, as well as other operation
18 efficiencies that were identified. Mr. DeFelice describes
19 the general plant savings within his direct testimony.
20 Additional detail can be found within my workpapers
21 included with the Company's filing. This adjustment
22 increases Idaho net operating income by \$12,000.

23 The adjustment in column (r), **Working Capital**
24 increases total rate base for the Company's working capital
25 adjustment. The Company has calculated cash working

1 capital in this proceeding on the basis of the "1/8 of O&M"
2 formula (also known as the Federal Energy Regulatory
3 Commission's "one-eighth" formula or "45 day" method).
4 This methodology divides Idaho total O&M expenses (less
5 purchased gas: accounts 804, 805 and 808) by eight, the
6 approximate number of 45 day periods within a year. FERC's
7 use of 45 days represents an estimate of days that elapse
8 between payments for operating expenses associated with
9 providing service to customers and receiving payment from
10 customers. Since investors supply the funds to finance
11 operations during this lag period, it is appropriated to
12 provide a return on those working capital funds. The
13 Company believes that this methodology, given the
14 complexities of a multi-state, multi-service utility such
15 as Avista is a reasonable approach for calculating an
16 individual state and service working capital adjustment.
17 The effect on Idaho rate base is an increase of \$1,692,000.

18 The adjustment in column (s), **Restate Debt Interest**,
19 restates debt interest using the Company's pro forma
20 weighted average cost of debt, as outlined in the testimony
21 and exhibits of Mr. Thies. As applied to Idaho's pro forma
22 level of rate base, produces a pro forma level of tax
23 deductible interest expense. The federal income tax effect
24 of the restated level of interest for the test period
25 decreases Idaho net operating income by \$44,000.

1 The last column on page 7, entitled **Restated Total**,
2 subtotals all the preceding columns (b) through column (s),
3 excluding the subtotal column. These totals represent
4 actual operating results and rate base plus the standard
5 normalizing and restating adjustments.

6

7 **Pro Forma Adjustments**

8 **Q. Please explain the significance of the 8 columns**
9 **subsequent to the Restated Total column on pages 8 through**
10 **9 of your Exhibit No. 12, Schedule 2.**

11 A. The adjustments starting on page 8 are pro forma
12 adjustments to reflect known and measurable changes between
13 the test period and the pro forma period. In this case,
14 they encompass revenue and expense items, and natural gas
15 capital projects. These adjustments bring the operating
16 results and rate base to the final pro forma level for the
17 test year.

18 **Q. Please continue with your explanation of the**
19 **adjustments on page 8.**

20 A. The first adjustment on page 8 in column (PF1),
21 **Pro Forma Labor-Non-Exec**, reflects known and measurable
22 changes to test period union and non-union wages and
23 salaries, excluding executive salaries, which are handled
24 separately in adjustment PF2. For non-union employees,
25 test period wages and salaries are restated to include the

1 March 2010 overall actual increase of 2.8%, and seven
2 months of the planned March 2011 increase of 2.4%. The
3 Company's Board is scheduled to address the 2011 planned
4 increase at the Board of Director's meeting in May 2010.

5 Also included in this adjustment are the 2010 and 2011
6 (seven months) union contract increases currently being
7 negotiated. The Company anticipates a final union contract
8 agreement will be completed by the end of second quarter of
9 2010. The methodology behind this adjustment is consistent
10 with that used in Case No. AVU-G-09-1. The effect of this
11 adjustment on Idaho net operating income is a decrease of
12 \$140,000.

13 The adjustment in column (PF2) is **Pro Forma Labor-**
14 **Executive**, reflects known and measurable changes to
15 executive compensation, restating executive compensation
16 test period salary expense to actual salary levels at 2010.
17 This adjustment takes into account changes in compensation
18 for the executive team in 2010 only. Although the officers
19 did not receive a 2009 pay increase, this adjustment does
20 reflect an annual increase for the actual overall 2010
21 officer increase of 2.86%. Compensation costs for non-
22 utility operations are excluded, as executives routinely
23 charge a portion of their time to non-utility operations,
24 commensurate with the amount of time spent on such
25 activities, based on a survey of each executive. The

1 methodology behind this adjustment is consistent with that
2 used in the last general case, Case No. AVU-G-09-01. The
3 impact of this adjustment on Idaho net operating income is
4 a decrease of \$14,000.

5 The adjustment in column (PF3), **Pro Forma Employee**
6 **Benefits**, adjusts for changes in both the Company's pension
7 and medical insurance expense planned for 2009 as further
8 explained in the Electric Section above. This adjustment
9 increases Idaho net operating income by \$53,000

10 The adjustment in column (PF4), **Pro Forma Insurance**,
11 adjusts the test period insurance expense for general
12 liability, directors and officers (D&O) liability, and
13 property to the actual cost of insurance policies that are
14 in effect for 2010. Costs of system-wide insurance
15 policies for 2010 were slightly above costs for policies in
16 2009, due to increased costs in general liability
17 insurance. Insurance costs that are properly charged to
18 non-utility operations have been excluded from this
19 adjustment. This adjustment decreases Idaho net operating
20 income by \$12,000.

21 The adjustment in column (PF5), entitled **Pro Forma**
22 **Information Services**, pro forms in the administrative and
23 general (A&G) expenses associated with incremental changes
24 for information services costs planned for 2010 and 2011
25 above test period levels, as further explained in the

1 Electric Section. The impact of this adjustment on Idaho
2 net operating income is a decrease of \$201,000.

3 The adjustment in column (PF6), **Pro Forma Capital**
4 **Additions 2009**, pro forms in the capital cost and expenses
5 associated with adjusting the test period average-monthly-
6 average plant related balances at December 31, 2009, to
7 actual end-of-period balances for plant in service at
8 December 31, 2009. The capital costs have been included
9 for December 31, 2009 with the associated depreciation
10 expense and property tax, as well as the appropriate
11 accumulated depreciation and deferred income tax rate base
12 offsets. This adjustment was made under the direction of
13 Mr. DeFelice and is described further in his testimony.
14 This adjustment decreases Idaho net operating income by
15 \$116,000 and decreases rate base by \$625,000.

16 **Q. Please turn to page 9 and explain the adjustments**
17 **shown there.**

18 A. The first adjustment on page 9 in column (PF7),
19 **Pro Forma Capital Additions 2010**, pro forms in the capital
20 cost and expenses associated with pro forming in capital
21 expenditures for 2010. This adjustment includes projects
22 completed during 2010, and thus were normalized to reflect
23 annual amounts, and projects expected to be completed and
24 transferred to plant-in-service by December 31, 2010. The
25 capital costs have been included for their appropriate pro

1 forma period with the associated depreciation expense and
2 property tax, as well as the appropriate accumulated
3 depreciation and deferred income tax rate base offsets.
4 This adjustment also reduces the 2009 vintage plant net
5 rate base (including accumulated depreciation and deferred
6 FIT) to an end of period December 31, 2010 adjusted
7 balance. This adjustment was also made under the direction
8 of Mr. DeFelice and is described further in his testimony.
9 This adjustment decreases Idaho net operating income by
10 \$235,000 and decreases rate base by \$1,886,000.

11 The adjustment in column (PF8), **Pro Forma JP Storage**,
12 pro forms revenues, expenses, capital investment and
13 inventory for the increased storage capacity and
14 deliverability associated with the transfer on May 1, 2011
15 of a portion of the Jackson Prairie (JP) Storage facility
16 to the Utility that was previously utilized by Avista
17 Energy. Assets with a net book value of approximately
18 \$11.6 million will transfer from Avista Energy to Avista
19 Utilities, which is comprised of approximately \$5.9 million
20 of cushion gas and approximately \$5.7 million of fixed
21 assets. Mr. Christie discusses the details of this
22 transfer.

23 Idaho's share of these assets on a 2010/2011 average-
24 of-monthly-average basis increases net rate base by
25 \$1,081,000. The adjustment also includes a rate base

1 increase of \$2,396,000 for the working gas associated with
2 the additional storage. In addition, underground storage
3 expense increased for the additional operating,
4 depreciation and property taxes expense by approximately
5 \$35,000. The details of the proposed accounting treatment
6 of this adjustment is provided with my workpapers. The
7 impact of this adjustment decreases Idaho net operating
8 income by \$23,000 and increases rate base by \$3,449,000.

9 The last column on page 9, **Pro Forma Total**, reflects
10 total pro forma results of operations and rate base
11 consisting of twelve-months ended December 31, 2009 actual
12 results and the total of all normalizing and pro forma
13 adjustments.

14 **Q. Referring back to page 1, line 43, of Exhibit No.**
15 **12, Schedule 2, what was the actual and pro forma gas rate**
16 **of return realized by the Company during the test period?**

17 **A.** For the State of Idaho, the actual test period
18 rate of return was 7.27%. The pro forma rate of return is
19 6.93% under present rates. Thus, the Company does not, on
20 a pro forma basis for the test period, realize the 8.55%
21 rate of return requested by the Company in this case.

22 **Q. How much additional net operating income would be**
23 **required for the State of Idaho gas operations to allow the**
24 **Company an opportunity to earn its proposed 8.55% rate of**
25 **return on a pro forma basis?**

1 A. The net operating income deficiency amounts to
2 \$1,640,000, as shown on line 5, page 2 of Exhibit No. 12,
3 Schedule 2. The resulting revenue requirement is shown on
4 line 7 and amounts to \$2,575,000, or an increase of 3.64%
5 over pro forma general business and transportation
6 revenues.

7

8

V. ALLOCATION PROCEDURES

9 Q. Have there been any changes to the Company's
10 system and jurisdictional procedures since the Company's
11 last general electric and natural gas cases, Case Nos. AVU-
12 E-09-01 and AVU-G-09-01?

13 A. No. For ratemaking purposes, the Company
14 allocates revenues, expenses and rate base between electric
15 and gas services and between Washington, Idaho, and Oregon
16 jurisdictions where electric and/or gas service is
17 provided. The current methodology was implemented in 1994
18 and has not changed. The allocation factors used in this
19 case have been provided with my workpapers.

20

21

VI. OTHER

22 Q. Please address the filing requirements as
23 required in Order No. 29962.

24 A. In Order No. 29962 (Case Nos. AVU-E-05-9 and AVU-
25 G-05-3), the Commission directed the Company to record

1 regulatory assets or liabilities associated with the
2 implementation of Statement of Financial Accounting
3 Standards (SFAS) 143. As a result of the Order, the
4 Company is required to file annually, and as part of any
5 rate case filing, all journal entries made under the
6 requirements of SFAS 143. These ARO transactions have been
7 removed from the test year (twelve months ended December
8 31, 2009) Results of Operations and have no impact on the
9 Company's earnings or rate request in this case. The
10 journal entries for the calendar year 2009 have been filed
11 with the Commission in our annual compliance filing.

12 Q. Does that conclude your pre-filed direct
13 testimony?

14 A. Yes, it does.

DAVID J. MEYER
VICE PRESIDENT AND CHIEF COUNSEL OF
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)	CASE NO. AVU-E-10-01
OF AVISTA CORPORATION FOR THE)	CASE NO. AVU-G-10-01
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR ELECTRIC AND)	
NATURAL GAS SERVICE TO ELECTRIC)	EXHIBIT NO. 12
AND NATURAL GAS CUSTOMERS IN THE)	
STATE OF IDAHO)	ELIZABETH M. ANDREWS

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO PRO FORMA RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	WITH PRESENT RATES			WITH PROPOSED RATES	
		Actual Per Results Report	Total Adjustments	Pro Forma Total	Proposed Revenues & Related Exp	Pro Forma Proposed Total
	a	b	c	d	e	f
REVENUES						
1	Total General Business	\$246,714	\$ (17,221)	\$229,493	\$32,114	\$261,607
2	Interdepartmental Sales	205		205		205
3	Sales for Resale	69,739	(50,033)	19,706		19,706
4	Total Sales of Electricity	316,658	(67,254)	249,404	32,114	281,518
5	Other Revenue	16,578	(10,712)	5,866		5,866
6	Total Electric Revenue	333,236	(77,966)	255,270	32,114	287,384
EXPENSES						
Production and Transmission						
7	Operating Expenses	70,555	15,367	85,922		85,922
8	Purchased Power	119,313	(66,501)	52,812		52,812
9	Depreciation and Amortization	10,811	3,767	14,578		14,578
10	Taxes	4,666	903	5,569		5,569
11	Total Production & Transmission	205,345	(46,464)	158,881	0	158,881
Distribution						
12	Operating Expenses	8,564	63	8,627		8,627
13	Depreciation	9,731	807	10,538		10,538
14	Taxes	5,063	(2,678)	2,385	455	2,840
15	Total Distribution	23,358	(1,808)	21,550	455	22,005
16	Customer Accounting	4,299	(12)	4,287	144	4,431
17	Customer Service & Information	5,935	(4,631)	1,304		1,304
18	Sales Expenses	251	(8)	243		243
Administrative & General						
19	Operating Expenses	21,276	1,573	22,849	53	22,902
20	Depreciation	4,563	1,990	6,553		6,553
21	Taxes		145	145		145
22	Total Admin. & General	25,839	3,708	29,547	53	29,600
23	Total Electric Expenses	265,027	(49,215)	215,812	652	216,464
24	OPERATING INCOME BEFORE FIT	68,209	(28,751)	39,458	31,462	70,920
FEDERAL INCOME TAX						
25	Current Accrual	2,841	(9,179)	(6,338)	11,012	4,674
26	Deferred Income Taxes	14,564	(237)	14,327		14,327
27	Amortized Investment Tax Credit	(16)	(47)	(63)		(63)
SETTLEMENT EXCHANGE POWER						
28	NET OPERATING INCOME	\$50,820	(\$19,288)	\$31,532	\$20,450	\$51,981
RATE BASE						
PLANT IN SERVICE						
29	Intangible	\$30,259	\$17,044	\$47,303		\$47,303
30	Production	367,474	14,217	381,691		381,691
31	Transmission	163,053	9,347	172,400		172,400
32	Distribution	384,274	25,272	409,546		409,546
33	General	58,812	11,705	70,517		70,517
34	Total Plant in Service	1,003,872	77,585	1,081,457	0	1,081,457
35	ACCUMULATED DEPRECIATION	332,016	41,016	373,032		373,032
36	ACCUM. PROVISION FOR AMORTIZATION	4,967	253	5,220		5,220
37	Total Accum. Depreciation & Amort.	336,983	41,269	378,252	0	378,252
38	GAIN ON SALE OF BUILDING		(168)	(168)		(168)
39	WORKING CAPITAL		9,863	9,863		9,863
40	DEFERRED TAXES		(104,938)	(104,938)		(104,938)
41	TOTAL RATE BASE	\$666,889	(\$68,790)	\$607,962	\$0	\$607,962
42	RATE OF RETURN	7.62%		5.19%	8.55%	

AVISTA UTILITIES
Calculation of General Revenue Requirement
IDAHO - Electric System
TWELVE MONTHS ENDED DECEMBER 31, 2009

Line No.	Description	(000's of Dollars)
1	Pro Forma Rate Base	\$607,962
2	Proposed Rate of Return	<u>8.55%</u>
3	Net Operating Income Requirement	\$51,981
4	Pro Forma Net Operating Income	<u>\$31,532</u>
5	Net Operating Income Deficiency	\$20,449
6	Conversion Factor	0.63676
7	Revenue Requirement	<u>\$32,114</u>
8	Total General Business Revenues	\$229,698
9	Percentage Revenue Increase	<u><u>13.98%</u></u>

AVISTA UTILITIES
Calculation of General Revenue Requirement
Idaho - Electric
Pro Forma Cost of Capital
(000's OF DOLLARS)

<u>Idaho Component</u>	<u>Pro Forma Cost of Capital</u>			<u>Excludes STD</u>
	<u>Capital Structure</u>	<u>Cost</u>	<u>Weighted Cost</u>	
Long-Term Debt	50.00%	6.200%	3.10%	ID Wtd Debt 3.10%
Pref Trust	0.00%	0.000%	0.00%	
Common	50.00%	10.90%	5.45%	
Total	<u>100.00%</u>		<u>8.55%</u>	

AVISTA UTILITIES
CALCULATION OF CONVERSION FACTOR: IDAHO ELECTRIC
TWELVE MONTHS ENDED DECEMBER 31, 2009

Revenue:		1.000000
Expense:		
Uncollectibles (1)		0.004498
Commission Fees (2)		0.001662
Idaho Income Tax (3)		0.014203
Total Expense		<u>0.020363</u>
Net Operating Income Before FIT		0.979637
Federal Incon	0.35	0.342873
REVENUE CONVERSION FACTOR		<u>0.63676</u>

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Per Results Report	Deferred FIT Rate Base	Deferred Gain on Office Building	Colstrip 3 AFUDC Elimination	Colstrip Common AFUDC	Kettle Falls & Boulder Park Disallow.	Customer Advances
	a	b	c	d	e	f	g	h
REVENUES								
1	Total General Business	\$246,714						
2	Interdepartmental Sales	205						
3	Sales for Resale	69,739						
4	Total Sales of Electricity	316,658	0	0	0	0	0	0
5	Other Revenue	16,578						
6	Total Electric Revenue	333,236	0	0	0	0	0	0
EXPENSES								
Production and Transmission								
7	Operating Expenses	70,555						
8	Purchased Power	119,313						
9	Depreciation and Amortization	10,811			193			
10	Taxes	4,666						
11	Total Production & Transmission	205,345	0	0	193	0	0	0
Distribution								
12	Operating Expenses	8,564						
13	Depreciation	9,731						
14	Taxes	5,063						
15	Total Distribution	23,358	0	0	0	0	0	0
16	Customer Accounting	4,299						
17	Customer Service & Information	5,935						
18	Sales Expenses	251						
Administrative & General								
19	Operating Expenses	21,276						
20	Depreciation	4,563						
21	Taxes							
22	Total Admin. & General	25,839	0	0	0	0	0	0
23	Total Electric Expenses	265,027	0	0	193	0	0	0
24	OPERATING INCOME BEFORE FIT	68,209	0	0	(193)	0	0	0
FEDERAL INCOME TAX								
25	Current Accrual	2,841						
26	Deferred Income Taxes	14,564						
27	Amortized ITC - Noxon	(16)						
28	NET OPERATING INCOME	\$50,820	\$0	\$0	(\$193)	\$0	\$0	\$0
RATE BASE								
PLANT IN SERVICE								
29	Intangible	\$30,259						
30	Production	367,474			7,390	903	(5,609)	
31	Transmission	163,053						
32	Distribution	384,274						(898)
33	General	58,812						
34	Total Plant in Service	1,003,872	0	0	7,390	903	(5,609)	(898)
35	ACCUMULATED DEPRECIATION	332,016			5,690		(2,929)	
36	ACCUM. PROVISION FOR AMORTIZATION	4,967						
37	Total Accum. Depreciation & Amort.	336,983	0	0	5,690	0	(2,929)	0
38	GAIN ON SALE OF BUILDING			(168)				
39	WORKING CAPITAL							
40	DEFERRED TAXES		(94,533)	59			646	
41	TOTAL RATE BASE	\$666,889	(\$94,533)	(\$109)	\$1,700	\$903	(\$2,034)	(\$898)
42	RATE OF RETURN	7.62%						

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Weatherizn and DSM Investment	Restating CDA Settlement	Restating CDA Settlement Deferral	Restating CDA/SRR CDR	Restating Spokane Rvr Relicensing	Restating Spokane River Deferral
	a	i	j	k	l	m	n
REVENUES							
1	Total General Business						
2	Interdepartmental Sales						
3	Sales for Resale						
4	Total Sales of Electricity	0	0	0	0	0	0
5	Other Revenue						
6	Total Electric Revenue	0	0	0	0	0	0
EXPENSES							
Production and Transmission							
7	Operating Expenses		81		703		
8	Purchased Power						
9	Depreciation and Amortization		226	101	53	118	19
10	Taxes						
11	Total Production & Transmission	0	307	101	756	118	19
Distribution							
12	Operating Expenses						
13	Depreciation						
14	Taxes		(4)	(1)	(11)	(2)	
15	Total Distribution	0	(4)	(1)	(11)	(2)	0
16	Customer Accounting						
17	Customer Service & Information						
18	Sales Expenses						
Administrative & General							
19	Operating Expenses						
20	Depreciation						
21	Taxes						
22	Total Admin. & General	0	0	0	0	0	0
23	Total Electric Expenses	0	303	100	745	116	19
24	OPERATING INCOME BEFORE FIT	0	(303)	(100)	(745)	(116)	(19)
FEDERAL INCOME TAX							
25	Current Accrual		(106)	(35)	(261)	(41)	(7)
26	Deferred Income Taxes						
27	Amortized ITC - Noxon						
28	NET OPERATING INCOME	\$0	(\$197)	(\$65)	(\$484)	(\$75)	(\$12)
RATE BASE							
PLANT IN SERVICE							
29	Intangible		\$(23)	\$317	\$703		\$60
30	Production	294					
31	Transmission						
32	Distribution						
33	General						
34	Total Plant in Service	294	(23)	317	703	0	60
35	ACCUMULATED DEPRECIATION		369	59	88		11
36	ACCUM. PROVISION FOR AMORTIZATION					253	
37	Total Accum. Depreciation & Amort.	0	369	59	88	253	11
38	GAIN ON SALE OF BUILDING						
39	WORKING CAPITAL						
40	DEFERRED TAXES		375	(90)	(215)	(206)	(17)
41	TOTAL RATE BASE	\$294	(\$17)	\$168	\$400	(\$459)	\$32
42	RATE OF RETURN						

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Restating Spokane River PM&E Deferral	Restating Montana Lease	Subtotal Actual	Eliminate B & O Taxes	Property Tax	Uncollect. Expense
	a	o	p	-	q	r	s
REVENUES							
1	Total General Business			\$246,714	\$(2,966)		
2	Interdepartmental Sales			205			
3	Sales for Resale			69,739			
4	Total Sales of Electricity	0	0	316,658	(2,966)	0	0
5	Other Revenue			16,578			
6	Total Electric Revenue	0	0	333,236	(2,966)	0	0
EXPENSES							
Production and Transmission							
7	Operating Expenses		44	71,383			
8	Purchased Power			119,313			
9	Depreciation and Amortization	156		11,677			
10	Taxes			4,666		776	
11	Total Production & Transmission	156	44	207,039	0	776	0
Distribution							
12	Operating Expenses			8,564			
13	Depreciation			9,731			
14	Taxes	(2)	(1)	5,042	(2,955)	170	(2)
15	Total Distribution	(2)	(1)	23,337	(2,955)	170	(2)
16	Customer Accounting			4,299			172
17	Customer Service & Information			5,935			
18	Sales Expenses			251			
Administrative & General							
19	Operating Expenses			21,276			
20	Depreciation			4,563			
21	Taxes					4	
22	Total Admin. & General	0	0	25,839	0	4	0
23	Total Electric Expenses	154	43	266,700	(2,955)	950	170
24	OPERATING INCOME BEFORE FIT	(154)	(43)	66,536	(11)	(950)	(170)
FEDERAL INCOME TAX							
25	Current Accrual	(54)	(15)	2,322	(4)	(333)	(60)
26	Deferred Income Taxes			14,564			
27	Amortized ITC - Noxon			(16)			
28	NET OPERATING INCOME	(\$100)	(\$28)	\$49,666	(\$7)	(\$617)	(\$110)
RATE BASE							
PLANT IN SERVICE							
29	Intangible	\$468		\$31,784			
30	Production		1,983	372,435			
31	Transmission			163,053			
32	Distribution			383,376			
33	General			58,812			
34	Total Plant in Service	468	1,983	1,009,460	0	0	0
35	ACCUMULATED DEPRECIATION	78		335,382			
36	ACCUM. PROVISION FOR AMORTIZATION			5,220			
37	Total Accum. Depreciation & Amort.	78	0	340,602	0	0	0
38	GAIN ON SALE OF BUILDING			(168)			
39	WORKING CAPITAL						
40	DEFERRED TAXES	(137)	(694)	(94,812)			
41	TOTAL RATE BASE	\$253	\$1,289	\$573,878	\$0	\$0	\$0
42	RATE OF RETURN			8.65%			

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Regulatory Expense	Injuries and Damages	FIT	Idaho PCA	Nez Perce Settlement Adjustment	Eliminate A/R Expenses
	a	t	u	v	w	x	y
REVENUES							
1	Total General Business				\$ (17,604)		
2	Interdepartmental Sales						
3	Sales for Resale						
4	Total Sales of Electricity	0	0	0	(17,604)	0	0
5	Other Revenue						
6	Total Electric Revenue	0	0	0	(17,604)	0	0
EXPENSES							
Production and Transmission							
7	Operating Expenses				465	(15)	
8	Purchased Power						
9	Depreciation and Amortization						
10	Taxes						
11	Total Production & Transmission	0	0	0	465	(15)	0
Distribution							
12	Operating Expenses						
13	Depreciation						
14	Taxes	(1)	1				\$2
15	Total Distribution	(1)	1	0	0	0	2
16	Customer Accounting				(40)		\$ (162)
17	Customer Service & Information						
18	Sales Expenses						
Administrative & General							
19	Operating Expenses	43	(73)		(44)		
20	Depreciation						
21	Taxes						
22	Total Admin. & General	43	(73)	0	(44)	0	0
23	Total Electric Expenses	42	(72)	0	381	(15)	(160)
24	OPERATING INCOME BEFORE FIT	(42)	72	0	(17,985)	15	160
FEDERAL INCOME TAX							
25	Current Accrual	(15)	25	514	(6,132)	5	\$56
26	Deferred Income Taxes			3	(163)		
27	Amortized ITC - Noxon			(15)			
28	NET OPERATING INCOME	(\$27)	\$47	(\$502)	(\$11,690)	\$10	\$104
RATE BASE							
PLANT IN SERVICE							
29	Intangible						
30	Production						
31	Transmission						
32	Distribution						
33	General						
34	Total Plant in Service	0	0	0	0	0	0
35	ACCUMULATED DEPRECIATION						
36	ACCUM. PROVISION FOR AMORTIZATION						
37	Total Accum. Depreciation & Amort.	0	0	0	0	0	0
38	GAIN ON SALE OF BUILDING						
39	WORKING CAPITAL						
40	DEFERRED TAXES						
41	TOTAL RATE BASE	\$0	\$0	\$0	\$0	\$0	\$0
42	RATE OF RETURN						

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Revenue Normalization Adjustment	Misc Restating Adjs	Colstrip Mercury Emiss. O&M	Restating CS2 Levelized Adj	Restating Wartsila Amortization
	a	z	aa	ab	ac	ad
REVENUES						
1	Total General Business	\$3,349				
2	Interdepartmental Sales					
3	Sales for Resale					
4	Total Sales of Electricity	3,349	0	0	0	0
5	Other Revenue	92				
6	Total Electric Revenue	3,441	0	0	0	0
EXPENSES						
Production and Transmission						
7	Operating Expenses	490		481		
8	Purchased Power					
9	Depreciation and Amortization	1,910			221	108
10	Taxes					
11	Total Production & Transmission	2,400	0	481	221	108
Distribution						
12	Operating Expenses					
13	Depreciation					
14	Taxes	80	1	(7)		(2)
15	Total Distribution	80	1	(7)	0	(2)
16	Customer Accounting	16				
17	Customer Service & Information	(4,630)	(2)			
18	Sales Expenses		(9)			
Administrative & General						
19	Operating Expenses	6	(48)			
20	Depreciation					
21	Taxes					
22	Total Admin. & General	6	(48)	0	0	0
23	Total Electric Expenses	(2,128)	(58)	474	221	106
24	OPERATING INCOME BEFORE FIT	5,569	58	(474)	(221)	(106)
FEDERAL INCOME TAX						
25	Current Accrual	1,949	20	(166)		(37)
26	Deferred Income Taxes				(77)	
27	Amortized ITC - Noxon					
28	NET OPERATING INCOME	\$3,620	\$38	(\$308)	(\$144)	(\$69)
RATE BASE						
PLANT IN SERVICE						
29	Intangible					
30	Production					
31	Transmission					
32	Distribution					
33	General					
34	Total Plant in Service	0	0	0	0	0
35	ACCUMULATED DEPRECIATION					
36	ACCUM. PROVISION FOR AMORTIZATION					
37	Total Accum. Depreciation & Amort.	0	0	0	0	0
38	GAIN ON SALE OF BUILDING					
39	WORKING CAPITAL					
40	DEFERRED TAXES					
41	TOTAL RATE BASE	\$0	\$0	\$0	\$0	\$0
42	RATE OF RETURN					

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Restating Colstrip Lawsuit Stimant	Restating CCX	O&M Savings	Working Capital	Restate Debt Interest	Restated TOTAL
a		ac	af	ag	ah	ai	-
REVENUES							
1	Total General Business						\$229,493
2	Interdepartmental Sales						205
3	Sales for Resale						69,739
4	Total Sales of Electricity	0	0	0	0	0	299,437
5	Other Revenue						16,670
6	Total Electric Revenue	0	0	0	0	0	316,107
EXPENSES							
Production and Transmission							
7	Operating Expenses	154		(83)			72,875
8	Purchased Power						119,313
9	Depreciation and Amortization		425				14,341
10	Taxes						5,442
11	Total Production & Transmission	154	425	(83)	0	0	211,971
Distribution							
12	Operating Expenses			(28)			8,536
13	Depreciation						9,731
14	Taxes	(2)	(6)	3			2,324
15	Total Distribution	(2)	(6)	(25)	0	0	20,591
16	Customer Accounting						4,285
17	Customer Service & Information						1,303
18	Sales Expenses						242
Administrative & General							
19	Operating Expenses			(83)			21,077
20	Depreciation						4,563
21	Taxes						4
22	Total Admin. & General	0	0	(83)	0	0	25,644
23	Total Electric Expenses	152	419	(191)	0	0	264,036
24	OPERATING INCOME BEFORE FIT	(152)	(419)	191	0	0	52,071
FEDERAL INCOME TAX							
25	Current Accrual	(53)	(147)	67		65	(1,923)
26	Deferred Income Taxes						14,327
27	Amortized ITC - Noxon						(31)
28	NET OPERATING INCOME	(\$99)	(\$272)	\$124	\$0	(\$65)	\$39,698
RATE BASE							
PLANT IN SERVICE							
29	Intangible						\$31,784
30	Production						372,435
31	Transmission						163,053
32	Distribution						383,376
33	General						58,812
34	Total Plant in Service	0	0	0	0	0	1,009,460
35	ACCUMULATED DEPRECIATION						335,382
36	ACCUM. PROVISION FOR AMORTIZATION						5,220
37	Total Accum. Depreciation & Amort.	0	0	0	0	0	340,602
38	GAIN ON SALE OF BUILDING						(168)
39	WORKING CAPITAL				9,863		9,863
40	DEFERRED TAXES						(94,812)
41	TOTAL RATE BASE	\$0	\$0	\$0	\$9,863	\$0	\$583,741
42	RATE OF RETURN						6.80%

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Pro Forma Power Supply	Pro Forma Production Property Adj	Pro Forma Labor Non-Exec	Pro Forma Labor Exec	Pro Forma Transmission Rev/Exp	Pro Forma Capital Add 2009
	a	PF1	PF2	PF3	PF4	PF5	PF6
REVENUES							
1	Total General Business						
2	Interdepartmental Sales						
3	Sales for Resale	(49,400)	(633)				
4	Total Sales of Electricity	(49,400)	(633)	0	0	0	0
5	Other Revenue	(11,699)	(141)			1,036	
6	Total Electric Revenue	(61,099)	(774)	0	0	1,036	0
EXPENSES							
Production and Transmission							
7	Operating Expenses	13,999	(2,399)	324	1	94	
8	Purchased Power	(64,779)	(1,722)				
9	Depreciation and Amortization		(223)				130
10	Taxes		(161)				
11	Total Production & Transmission	(50,780)	(4,505)	324	1	94	130
Distribution							
12	Operating Expenses			227			
13	Depreciation						356
14	Taxes	(147)	53	(12)	(1)	13	(20)
15	Total Distribution	(147)	53	215	(1)	13	336
16	Customer Accounting			74			
17	Customer Service & Information			5			
18	Sales Expenses			5			
Administrative & General							
19	Operating Expenses			222	84		
20	Depreciation						889
21	Taxes						
22	Total Admin. & General	0	0	222	84	0	889
23	Total Electric Expenses	(50,927)	(4,452)	845	84	107	1,355
24	OPERATING INCOME BEFORE FIT	(10,172)	3,678	(845)	(84)	929	(1,355)
FEDERAL INCOME TAX							
25	Current Accrual	(3,560)	1,287	(296)	(29)	325	(474)
26	Deferred Income Taxes						
27	Amortized ITC - Noxon						
28	NET OPERATING INCOME	(\$6,612)	\$2,391	(\$549)	(\$55)	\$604	(\$881)
RATE BASE							
PLANT IN SERVICE							
29	Intangible						\$11,568
30	Production		(8,770)				4,740
31	Transmission						2,659
32	Distribution						10,035
33	General						6,232
34	Total Plant in Service	0	(8,770)	0	0	0	35,234
35	ACCUMULATED DEPRECIATION		(2,920)				11,202
36	ACCUM. PROVISION FOR AMORTIZATION						
37	Total Accum. Depreciation & Amort.	0	(2,920)	0	0	0	11,202
38	GAIN ON SALE OF BUILDING						
39	WORKING CAPITAL						
40	DEFERRED TAXES		997				(7,630)
41	TOTAL RATE BASE	\$0	(\$4,853)	\$0	\$0	\$0	\$16,402
42	RATE OF RETURN						

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Pro Forma Capital Add 2010	Pro Forma Noxon Gen 2010 & 2011	Pro Forma Information Services	Pro Forma Employee Benefits	Pro Forma Insurance
	a	PF7	PF8	PF9	PF10	PF11
REVENUES						
1	Total General Business					
2	Interdepartmental Sales					
3	Sales for Resale					
4	Total Sales of Electricity	0	0	0	0	0
5	Other Revenue					
6	Total Electric Revenue	0	0	0	0	0
EXPENSES						
Production and Transmission						
7	Operating Expenses		141	2	(204)	
8	Purchased Power					
9	Depreciation and Amortization	330				
10	Taxes	228	60			
11	Total Production & Transmission	558	201	2	(204)	0
Distribution						
12	Operating Expenses			10	(146)	
13	Depreciation	451				
14	Taxes	207	(3)	(18)	5	(1)
15	Total Distribution	658	(3)	(8)	(141)	(1)
16	Customer Accounting			(14)	(58)	
17	Customer Service & Information				(4)	
18	Sales Expenses				(4)	
Administrative & General						
19	Operating Expenses			1,299	94	73
20	Depreciation	1,101				
21	Taxes	141				
22	Total Admin. & General	1,242	0	1,299	94	73
23	Total Electric Expenses	2,458	198	1,279	(317)	72
24	OPERATING INCOME BEFORE FIT	(2,458)	(198)	(1,279)	317	(72)
FEDERAL INCOME TAX						
25	Current Accrual	(860)	(69)	(448)	111	(25)
26	Deferred Income Taxes					
27	Amortized ITC - Noxon		(32)			
28	NET OPERATING INCOME	(\$1,598)	(\$97)	(\$831)	\$206	(\$47)
RATE BASE						
PLANT IN SERVICE						
29	Intangible	\$3,951				
30	Production	8,542	4,744			
31	Transmission	6,688				
32	Distribution	16,135				
33	General	5,473				
34	Total Plant in Service	40,789	4,744	0	0	0
35	ACCUMULATED DEPRECIATION	29,268	100			
36	ACCUM. PROVISION FOR AMORTIZATION					
37	Total Accum. Depreciation & Amort.	29,268	100	0	0	0
38	GAIN ON SALE OF BUILDING					
39	WORKING CAPITAL					
40	DEFERRED TAXES	(3,211)	(282)			
41	TOTAL RATE BASE	\$8,310	\$4,362	\$0	\$0	\$0
42	RATE OF RETURN					

AVISTA UTILITIES
ELECTRIC RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Pro Forma Clark Fork/Spokane Rel PM&E	Pro Forma TOTAL
		PF12	PFT
REVENUES			
1	Total General Business		\$229,493
2	Interdepartmental Sales		205
3	Sales for Resale		19,706
4	Total Sales of Electricity	0	249,404
5	Other Revenue		5,866
6	Total Electric Revenue	0	255,270
EXPENSES			
Production and Transmission			
7	Operating Expenses	\$1,089	85,922
8	Purchased Power		52,812
9	Depreciation and Amortization		14,578
10	Taxes		5,569
11	Total Production & Transmission	1,089	158,881
Distribution			
12	Operating Expenses		8,627
13	Depreciation		10,538
14	Taxes	\$ (15)	2,385
15	Total Distribution	(15)	21,550
16	Customer Accounting		4,287
17	Customer Service & Information		1,304
18	Sales Expenses		243
Administrative & General			
19	Operating Expenses		22,849
20	Depreciation		6,553
21	Taxes		145
22	Total Admin. & General	0	29,547
23	Total Electric Expenses	1,074	215,812
24	OPERATING INCOME BEFORE FIT	(1,074)	39,458
FEDERAL INCOME TAX			
25	Current Accrual	\$ (376)	(6,338)
26	Deferred Income Taxes		14,327
27	Amortized ITC - Noxon		(63)
28	NET OPERATING INCOME	(\$698)	\$31,532
RATE BASE			
PLANT IN SERVICE			
29	Intangible		\$47,303
30	Production		381,691
31	Transmission		172,400
32	Distribution		409,546
33	General		70,517
34	Total Plant in Service	0	1,081,457
35	ACCUMULATED DEPRECIATION		373,032
36	ACCUM. PROVISION FOR AMORTIZATION		5,220
37	Total Accum. Depreciation & Amort.	0	378,252
38	GAIN ON SALE OF BUILDING		(168)
39	WORKING CAPITAL		9,863
40	DEFERRED TAXES		(104,938)
41	TOTAL RATE BASE	\$0	\$607,962
42	RATE OF RETURN		5.19%

AVISTA UTILITIES
GAS RESULTS OF OPERATION
IDAHO PRO FORMA RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	WITH PRESENT RATES			WITH PROPOSED RATES	
		Actual Per Results Report	Total Adjustments	Pro Forma Total	Proposed Revenues & Related Exp	Pro Forma Proposed Total
	a	b	c	d	e	f
REVENUES						
1	Total General Business	\$83,096	\$ (12,797)	\$70,299	\$2,575	\$72,874
2	Total Transportation	491	(95)	396		396
3	Other Revenues	38,263	(38,128)	135		135
4	Total Gas Revenues	121,850	(51,020)	70,830	2,575	73,405
EXPENSES						
5	Exploration and Development					
	Production					
6	City Gate Purchases	86,275	(42,945)	43,330		43,330
7	Purchased Gas Expense	401	8	409		409
8	Net Nat Gas Storage Trans	3,614	(3,614)	-		0
9	Total Production	90,290	(46,551)	43,739	0	43,739
	Underground Storage					
10	Operating Expenses	173	45	218		218
11	Depreciation	169	(6)	163		163
12	Taxes	59	5	64		64
13	Total Underground Storage	401	44	445	0	445
	Distribution					
14	Operating Expenses	3,726	41	3,767		3,767
15	Depreciation	3,328	129	3,457		3,457
16	Taxes	2,329	(1,447)	882	37	919
17	Total Distribution	9,383	(1,277)	8,106	37	8,143
18	Customer Accounting	2,409	(262)	2,147	12	2,159
19	Customer Service & Information	2,236	(1,994)	242		242
20	Sales Expenses	195	(5)	190		190
	Administrative & General					
21	Operating Expenses	4,737	346	5,083	4	5,087
22	Depreciation	957	356	1,313		1,313
23	Taxes	9	34	43		43
24	Total Admin. & General	5,703	736	6,439	4	6,443
25	Total Gas Expense	110,617	(49,309)	61,308	53	61,361
26	OPERATING INCOME BEFORE FIT	11,233	(1,711)	9,522	2,522	12,044
FEDERAL INCOME TAX						
27	Current Accrual	1,561	(555)	1,006	883	1,889
28	Deferred FIT	1,516	(8)	1,508		1,508
29	Amort ITC	(19)	0	(19)		(19)
30	NET OPERATING INCOME	8,175	(\$1,148)	7,027	\$1,639	\$8,666
RATE BASE: PLANT IN SERVICE						
31	Underground Storage	9,364	(352)	9,012		9,012
32	Distribution Plant	143,028	2,952	145,980		145,980
33	General Plant	13,432	3,484	16,916		16,916
34	Total Plant in Service	165,824	6,084	171,908	0	171,908
ACCUMULATED DEPRECIATION						
35	Underground Storage	3,354	168	3,522		3,522
36	Distribution Plant	46,085	4,263	50,348		50,348
37	General Plant	3,996	1,660	5,656		5,656
38	Total Accum. Depreciation	53,435	6,091	59,526	0	59,526
39	DEFERRED FIT	0	(20,027)	(20,027)		(20,027)
40	GAS INVENTORY	0	7,377	7,377		7,377
41	WORKING CAPITAL	0	1,692	1,692		1,692
42	GAIN ON SALE OF BUILDING	0	(55)	(55)		(55)
43	TOTAL RATE BASE	112,389	(\$11,020)	101,369	\$0	101,369
44	RATE OF RETURN	7.27%		6.93%		8.55%

AVISTA UTILITIES
Calculation of General Revenue Requirement
Idaho - Gas
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000's OF DOLLARS)

Line No.	Description	IDAHO
1	Pro Forma Rate Base	\$101,369
2	Proposed Rate of Return	<u>8.55%</u>
3	Net Operating Income Requirement	\$8,667
4	Pro Forma Net Operating Income	<u>\$7,027</u>
5	Net Operating Income Deficiency	\$1,640
6	Conversion Factor	0.636764
7	Revenue Requirement	<u>\$2,575</u>
8	Total General Business Revenues	<u>\$70,695</u>
9	Percentage Revenue Increase	<u><u>3.64%</u></u>

AVISTA UTILITIES
Calculation of General Revenue Requirement
Idaho - Gas
Pro Forma Cost of Capital
(000's OF DOLLARS)

Idaho Component	Pro Forma Cost of Capital			Excludes STD
	Capital Structure	Cost	Weighted Cost	
Long-Term Debt	50.00%	6.200%	3.10%	ID Wtd Debt 3.10%
Pref Trust	0.00%	0.000%	0.00%	
Pref Stock			0.00%	
Common	50.00%	10.90%	5.45%	
Total	<u>100.00%</u>		<u>8.55%</u>	

**AVISTA UTILITIES
CALCULATION OF CONVERSION FACTOR: IDAHO GAS
TWELVE MONTHS ENDED DECEMBER 31, 2009**

Revenues	1.000000
Expense:	
Uncollectibles (1)	0.004498
Commission Fees (2)	0.001662
Idaho Income Tax (3)	0.014203
Total Expense	<u>0.020363</u>
Net Operating Income Before FIT	0.979637
Federal Inc 35.00%	0.342873
REVENUE CONVERSION FACTOR	<u>0.636764</u>

AVISTA UTILITIES
GAS RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Per Results Report	Deferred FIT Rate Base	Deferred Gain on Office Building	Gas Inventory	Weatherization and DSM Investment	Customer Advances
	a	b	c	d	e	f	g
REVENUES							
1	Total General Business	\$83,096					
2	Total Transportation	491					
3	Other Revenues	38,263					
4	Total Gas Revenues	121,850	0	0	0	0	0
EXPENSES							
5	Exploration and Development	0					
Production							
6	City Gate Purchases	86,275					
7	Purchased Gas Expense	401					
8	Net Nat Gas Storage Trans	3,614					
9	Total Production	90,290	0	0	0	0	0
Underground Storage							
10	Operating Expenses	173					
11	Depreciation	169					
12	Taxes	59					
13	Total Underground Storage	401	0	0	0	0	0
Distribution							
14	Operating Expenses	3,726					
15	Depreciation	3,328					
16	Taxes	2,329					
17	Total Distribution	9,383	0	0	0	0	0
18	Customer Accounting	2,409		0	0	0	0
19	Customer Service & Information	2,236					
20	Sales Expenses	195					
Administrative & General							
21	Operating Expenses	4,737					
22	Depreciation	957					
23	Taxes	9					
24	Total Admin. & General	5,703	0	0	0	0	0
25	Total Gas Expense	110,617	0	0	0	0	0
26	OPERATING INCOME BEFORE FIT	11,233	0	0	0	0	0
FEDERAL INCOME TAX							
27	Current Accrual	1,561					
28	Deferred FIT	1,516					
29	Amort ITC	(19)					
30	NET OPERATING INCOME	\$8,175	\$0	\$0	\$0	\$0	\$0
RATE BASE: PLANT IN SERVICE							
31	Underground Storage	9,364					
32	Distribution Plant	143,028				152	(74)
33	General Plant	13,432					
34	Total Plant in Service	165,824	0	0	0	152	(74)
ACCUMULATED DEPRECIATION							
35	Underground Storage	3,354					
36	Distribution Plant	46,085					
37	General Plant	3,996					
38	Total Accum. Depreciation	53,435	0	0	0	0	0
39	DEFERRED FIT	0	(17,318)	19			
40	GAS INVENTORY	0			3,626		
41	WORKING CAPITAL	0					
42	GAIN ON SALE OF BUILDING	0		(55)			
43	TOTAL RATE BASE	\$112,389	(\$17,318)	(\$36)	\$3,626	\$152	(\$74)
44	RATE OF RETURN						

AVISTA UTILITIES
GAS RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Subtotal Actual	Revenue Normalization	Eliminate B & O Taxes	Property Tax	Uncollectible Expense	Regulatory Expense Adjustment	Injuries and Damages
	a	b	c	d	e	f	g	h
REVENUES								
1	Total General Business	\$83,096	\$ (11,260)	\$ (1,537)				
2	Total Transportation	491	(87)	(8)				
3	Other Revenues	38,263	(38,128)					
4	Total Gas Revenues	121,850	(49,475)	(1,545)	0	0	0	0
EXPENSES								
5	Exploration and Development	0						
Production								
6	City Gate Purchases	86,275	(42,945)					
7	Purchased Gas Expense	401						
8	Net Nat Gas Storage Trans	3,614	(3,614)					
9	Total Production	90,290	(46,559)	0	0	0	0	0
Underground Storage								
10	Operating Expenses	173						
11	Depreciation	169						
12	Taxes	59			7			
13	Total Underground Storage	401	0	0	7	0	0	0
Distribution								
14	Operating Expenses	3,726						
15	Depreciation	3,328						
16	Taxes	2,329	(12)	(1,545)	91	3		1
17	Total Distribution	9,383	(12)	(1,545)	91	3	0	1
18	Customer Accounting	2,409	(51)	0		(189)	0	
19	Customer Service & Information	2,236	(1,994)					
20	Sales Expenses	195						
Administrative & General								
21	Operating Expenses	4,737	(18)				(15)	(60)
22	Depreciation	957						
23	Taxes	9			1			
24	Total Admin. & General	5,703	(18)	0	1	0	(15)	(60)
25	Total Gas Expense	110,617	(48,634)	(1,545)	99	(186)	(15)	(59)
26	OPERATING INCOME BEFORE FIT	11,233	(841)	0	(99)	186	15	59
FEDERAL INCOME TAX								
27	Current Accrual	1,561	(294)		(35)	65	5	21
28	Deferred FIT	1,516						
29	Amort ITC	(19)						
30	NET OPERATING INCOME	\$8,175	(\$547)	\$0	(\$64)	\$121	\$10	\$38
RATE BASE: PLANT IN SERVICE								
31	Underground Storage	9,364						
32	Distribution Plant	143,106						
33	General Plant	13,432						
34	Total Plant in Service	165,902	0	0	0	0	0	0
ACCUMULATED DEPRECIATION								
35	Underground Storage	3,354						
36	Distribution Plant	46,085						
37	General Plant	3,996						
38	Total Accum. Depreciation	53,435	0	0	0	0	0	0
39	DEFERRED FIT	(17,299)						
40	GAS INVENTORY	3,626						
41	WORKING CAPITAL	0						
42	GAIN ON SALE OF BUILDING	(55)						
43	TOTAL RATE BASE	\$98,739	\$0	\$0	\$0	\$0	\$0	\$0
44	RATE OF RETURN	8.28%						

AVISTA UTILITIES
GAS RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	FIT	Eliminate A/R Expenses	Misc. Restating Adjs	O&M Savings	Working Capital	Restate Debt Interest	Restated Total
	a	n	o	p	q	r	s	-
REVENUES								
1	Total General Business							\$70,299
2	Total Transportation							396
3	Other Revenues							135
4	Total Gas Revenues	0	0	0	0	0	0	70,830
EXPENSES								
5	Exploration and Development							0
	Production							
6	City Gate Purchases							43,330
7	Purchased Gas Expense							401
8	Net Nat Gas Storage Trans							0
9	Total Production	0	0	0	0	0	0	43,731
	Underground Storage							
10	Operating Expenses							173
11	Depreciation							169
12	Taxes							66
13	Total Underground Storage	0	0	0	0	0	0	408
	Distribution							
14	Operating Expenses							3,726
15	Depreciation							3,328
16	Taxes							867
17	Total Distribution	0	0	0	0	0	0	7,921
18	Customer Accounting		(27)					2,142
19	Customer Service & Information			(1)				241
20	Sales Expenses			(5)				190
	Administrative & General							
21	Operating Expenses			(13)	19			4,650
22	Depreciation							957
23	Taxes							10
24	Total Admin. & General	0	0	(13)	19	0	0	5,617
25	Total Gas Expense	0	(27)	(19)	19	0	0	60,250
26	OPERATING INCOME BEFORE FIT	0	27	19	(19)	0	0	10,580
	FEDERAL INCOME TAX							
27	Current Accrual		9	7	(7)		44	1,376
28	Deferred FIT	(8)						1,508
29	Amort ITC							(19)
30	NET OPERATING INCOME	\$8	\$18	\$12	(\$12)	\$0	(\$44)	\$7,715
RATE BASE: PLANT IN SERVICE								
31	Underground Storage							9,364
32	Distribution Plant							143,106
33	General Plant							13,432
34	Total Plant in Service	0	0	0	0	0	0	165,902
ACCUMULATED DEPRECIATION								
35	Underground Storage							3,354
36	Distribution Plant							46,085
37	General Plant							3,996
38	Total Accum. Depreciation	0	0	0	0	0	0	53,435
39	DEFERRED FIT							(17,299)
40	GAS INVENTORY							3,626
41	WORKING CAPITAL					1,692		1,692
42	GAIN ON SALE OF BUILDING							(55)
43	TOTAL RATE BASE	\$0	\$0	\$0	\$0	\$1,692	\$0	\$100,431
44	RATE OF RETURN							7.68%

AVISTA UTILITIES
GAS RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Pro Forma Labor Non-Exec PF1	Pro Forma Labor Exec PF2	Pro Forma Employee Benefits PF3	Pro Forma Insurance PF4	Pro Forma Information Services PF5	Pro Forma Capital Add 2009 PF6
REVENUES							
1	Total General Business						
2	Total Transportation						
3	Other Revenues						
4	Total Gas Revenues	0	0	0	0	0	0
EXPENSES							
5	Exploration and Development						
	Production						
6	City Gate Purchases						
7	Purchased Gas Expense	10		(2)			
8	Net Nat Gas Storage Trans						
9	Total Production	10	0	(2)	0	0	0
	Underground Storage						
10	Operating Expenses						
11	Depreciation						(3)
12	Taxes						
13	Total Underground Storage	0	0	0	0	0	(3)
	Distribution						
14	Operating Expenses	113		(72)			
15	Depreciation						86
16	Taxes	(3)		1		\$ (4)	(3)
17	Total Distribution	110	0	(71)	0	(4)	83
18	Customer Accounting	41		(33)		\$ (3)	
19	Customer Service & Information	3		(2)			
20	Sales Expenses	3		(3)			
	Administrative & General						
21	Operating Expenses	48	21	29	18	\$317	
22	Depreciation						99
23	Taxes						
24	Total Admin. & General	48	21	29	18	317	99
25	Total Gas Expense	215	21	(82)	18	310	179
26	OPERATING INCOME BEFORE FIT	(215)	(21)	82	(18)	(310)	(179)
	FEDERAL INCOME TAX						
27	Current Accrual	(75)	(7)	29	(6)	\$ (109)	(63)
28	Deferred FIT						
29	Amort ITC						
30	NET OPERATING INCOME	(\$140)	(\$14)	\$53	(\$12)	(\$201)	(\$116)
RATE BASE: PLANT IN SERVICE							
31	Underground Storage						\$ (185)
32	Distribution Plant						926
33	General Plant						1,280
34	Total Plant in Service	0	0	0	0	0	2,021
ACCUMULATED DEPRECIATION							
35	Underground Storage						(2)
36	Distribution Plant						922
37	General Plant						508
38	Total Accum. Depreciation	0	0	0	0	0	1,428
39	DEFERRED FIT						(1,218)
40	GAS INVENTORY						
41	WORKING CAPITAL						
42	GAIN ON SALE OF BUILDING						
43	TOTAL RATE BASE	\$0	\$0	\$0	\$0	\$0	(\$625)
44	RATE OF RETURN						

AVISTA UTILITIES
GAS RESULTS OF OPERATION
IDAHO RESTATED RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2009
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Pro Forma Capital Add 2010 PF7	Pro Forma 2011 JP Storage PF8	Pro Forma Total -
REVENUES				
1	Total General Business			\$70,299
2	Total Transportation			396
3	Other Revenues			135
4	Total Gas Revenues	0	0	70,830
EXPENSES				
5	Exploration and Development Production			0
6	City Gate Purchases			43,330
7	Purchased Gas Expense			409
8	Net Nat Gas Storage Trans			0
9	Total Production	0	0	43,739
Underground Storage				
10	Operating Expenses		45	218
11	Depreciation	3	(6)	163
12	Taxes	2	(4)	64
13	Total Underground Storage	5	35	445
Distribution				
14	Operating Expenses			3,767
15	Depreciation	43		3,457
16	Taxes	24		882
17	Total Distribution	67	0	8,106
18	Customer Accounting			2,147
19	Customer Service & Information			242
20	Sales Expenses			190
Administrative & General				
21	Operating Expenses			5,083
22	Depreciation	257		1,313
23	Taxes	33		43
24	Total Admin. & General	290	0	6,439
25	Total Gas Expense	362	35	61,308
26	OPERATING INCOME BEFORE FIT	(362)	(35)	9,522
FEDERAL INCOME TAX				
27	Current Accrual	(127)	(12)	1,006
28	Deferred FIT			1,508
29	Amort ITC			(19)
30	NET OPERATING INCOME	(\$235)	(\$23)	\$7,027
RATE BASE: PLANT IN SERVICE				
31	Underground Storage	\$107	\$ (274)	9,012
32	Distribution Plant	1,948		145,980
33	General Plant	2,204		16,916
34	Total Plant in Service	4,259	(274)	171,908
ACCUMULATED DEPRECIATION				
35	Underground Storage	168	2	3,522
36	Distribution Plant	3,341		50,348
37	General Plant	1,152		5,656
38	Total Accum. Depreciation	4,661	2	59,526
39	DEFERRED FIT	(1,484)	(26)	(20,027)
40	GAS INVENTORY		3,751	7,377
41	WORKING CAPITAL			1,692
42	GAIN ON SALE OF BUILDING			(55)
43	TOTAL RATE BASE	(\$1,886)	\$3,449	\$101,369
44	RATE OF RETURN			6.93%