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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. AVU-E-11-01
OF AVISTA CORPORATION FOR THE)	CASE NO. AVU-G-11-01
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR ELECTRIC AND)	
NATURAL GAS SERVICE TO ELECTRIC)	DIRECT TESTIMONY
AND NATURAL GAS CUSTOMERS IN THE)	OF
STATE OF IDAHO)	DAVE B. DEFELICE
)	

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

I. INTRODUCTION

- 2 Q. Please state your name, employer and business
- 3 address.

- A. My name is Dave B. DeFelice. I am employed by
- 5 Avista Corporation as a Senior Business Analyst. My
- 6 business address is 1411 East Mission, Spokane, Washington.
- 7 Q. Please briefly describe your educational
- 8 background and professional experience.
- 9 A. I graduated from Eastern Washington University in
- 10 June of 1983 with a Bachelor of Arts Degree in Business
- 11 Administration, majoring in Accounting. I have served in
- 12 various positions within the Company, including Analyst
- 13 positions in the Finance Department (Rates Section and
- 14 Plant Accounting) and in the Marketing/Operations
- 15 Departments, as well. In 1999, I accepted the Senior
- 16 Business Analyst position that focuses on economic analysis
- 17 of various project proposals as well as evaluations and
- 18 recommendations pertaining to business policies and
- 19 practices.
- Q. As a Senior Business Analyst, what are your
- 21 responsibilities?
- 22 A. As a Senior Business Analyst, I am involved in
- 23 financial analysis of numerous projects within various
- 24 departments such as Engineering, Operations,
- 25 Marketing/Sales and Finance.
- Q. What is the scope of your testimony?

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3	capita	al i	nvest	tments	in	util	ity	plan	t for	the	2010	test

4 period.

Q. Are you sponsoring any exhibits?

A. Yes. I am sponsoring Exhibit 11, Schedules 1 through 3 which were prepared under my direction, and have been included to provide supporting information for the pro forma capital investment costs as described in this testimony.

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II. CAPITAL INVESTMENT RECOVERY

Q. What does the Company's request for rate relief include regarding investment in utility plant to serve customers?

A. As in prior rate cases, Avista started with rate base for the historical test year, which for this case is the average-of-monthly-averages (AMA) for the twelve months ended December 31, 2010. Adjustments were made to reflect certain capital additions, as described in detail below:

(1.) An adjustment was made to record capital at December 31, 2010, together with the associated accumulated depreciation and deferred federal income taxes at a 2010 end-of-period (EOP) basis. This adjustment includes

¹ Company witness Ms. Andrews incorporates the Idaho share of the adjustments in her revenue requirement calculation.

1 annualizing the associated depreciation expense 2 on the plant-in-service at December 31, 2010. 3 An adjustment was also made to reflect 4 all 2011 capital additions (excluding 5 distribution related capital expenditures made 6 associated with connecting are 7 customers to the Company's system) together 8 with the associated accumulated depreciation 9 and deferred federal income taxes at a 2011 EOP 10 basis. This adjustment included associated 11 expenses (depreciation expense and property 12 taxes) and offsets to expenses for the pro 13 forma additions. These specific capital 14 additions are identified later in my testimony. 15 In addition, the plant-in-service at December 16 31, 2010 was adjusted to a 2011 EOP basis. 17 An adjustment was also made to reflect 18 2012 additions all capital (excluding 19 distribution related capital expenditures made 20 associated with connecting that are 21 customers to the Company's system) together 22 with the associated accumulated depreciation 23 and deferred federal income taxes at a 2012 AMA 24 This adjustment included associated basis. 25 (depreciation expense and property expenses 26 taxes) and offsets to expenses for the pro 27 forma additions. These specific capital

1 additions are identified later in my testimony. 2 In addition, the plant-in-service at December 3 31, 2011 was adjusted to a 2012 AMA basis. 4 The utility plant investment that we have included in 5 this filing represents utility plant that will be "used and 6 useful" in providing service to customers during the period 7 that new retail rates from this filing will be in effect. 8 In addition, the plant investment that was pro formed into 9 this case was matched with offsetting factors. Including 10 the costs associated with this investment in retail rates 11 provides a proper "matching" of revenues from customers, 12 with the costs associated with providing service to 13 customers (including the cost of utility plant to serve 14 those customers). 15 In the Idaho PUC's Order No. 29602, for Case Nos. AVU-16 E - 04 - 1and AVU-G-04-1, dated October 8, 2004, the 17 Commission stated, at page 10, that: 18 Once a test year is selected, adjustments are 19 made to test year accounts and rate base to 20 reflect known and measurable changes so that test 21 totals accurately reflect anticipated 22 amounts for the future period when rates will be 23 in effect. The Idaho Supreme Court has described 24 "rate base" as "the utility's capital investment 25 amount." Industrial Customers of Idaho Power v. 26 Idaho PUC 134 Idaho 285, 291, 1 P.3d 786, 792 27 (2000). Adjustments to test year accounts 28 generally fall into three categories: 29 normalizing adjustments made for unusual 30 occurrences, like one-time events or extreme 31 weather conditions, so they do not unduly affect 32 the test year; 2) annualizing adjustments made

for events that occurred at some point in the

test year to average their effect as if they had

been in existence during the entire year; and 3)

known and measurable adjustments made to include

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events that occur outside the test year but will continue in the future to affect Company income and expenses.

4 5 If utility plant investment that is being used to 6 serve customers is not reflected in retail rates then the 7 retail rates will not be "just, fair, and reasonable," 8 i.e., it would not be just or reasonable for customers to 9 receive the benefit provided by the utility investment 10 without paying for it, and the retail rates would not 11 provide revenues sufficient to provide recovery of the 12 costs associated with providing service to customers.

- Q. Is the Company's application of these ratemaking principles in this filing consistent with prior general rate cases?
- A. Yes. In prior cases, the objective has been the same -- to include in retail rates the investment, or rate base, that is providing service to customers, and ensure that there is a proper matching of revenues and expenses during the period that rates are in effect.
- Q. How are we assured that the capital additions pro formed in this case will actually occur for 2011 and 2012?
- 23 A. Many of the 2011 projects are already underway or 24 completed either through actual construction, contracts 25 signed, and /or materials ordered. In addition, the actual 26 and planned capital expenditures for the utility for the 27 years 2007 through 2010 are shown in Table 1 below. The 28 table shows that actual capital expenditures have been very 29 close to the planned expenditures on a consistent basis.

- 1 During the last two years the actual expenditures have been
- 2 98% to 99% of the planned expenditures. I believe it is
- 3 fair to conclude that there is a high level of confidence
- 4 that the planned capital expenditures for 2011 and 2012,
- 5 which the Company has pro formed into this case, will occur
- 6 and it is reasonable for them to be included for recovery
- 7 in retail rates.

8 Table 1

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9 Percentage of Planned Actual Expenditures Expenditures Planned 10 (\$millions) (\$millions) (%) 2007 \$183.6 \$198.4 108% 11 \$194.2 \$205.4 106% 2008 \$199.7 99% 2009 \$202.0 12 98% 2010 \$210.0 \$206.8 13

Q. How does new investment in utility plant change rate base over time for ratemaking purposes?

Historically (until roughly the last five years), 17 the annual dollars spent by the Company on new utility 18 19 plant was relatively close to the level of depreciation 20 expense, with the exception of years where the Company invested in major new generating projects.2 Net rate base 21 22 stayed at a relatively constant level and the use of the 23 rate base amount from a prior year, i.e., a historical test year, would be adequate for setting rates for the upcoming 24 25 year, because there was little change in the net plant 26 investment used to serve customers.

² Recognizing that a portion of the costs associated with certain capital additions are offset by additional revenues.

In more recent years, however, Avista's investment in utility plant has significantly exceeded depreciation expense. Because of this, rate base in the rate year is significantly greater than the historical test period AMA rate base. This is shown in Illustration 1 below.

Illustration 1

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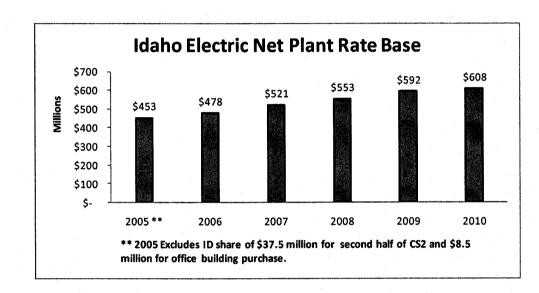
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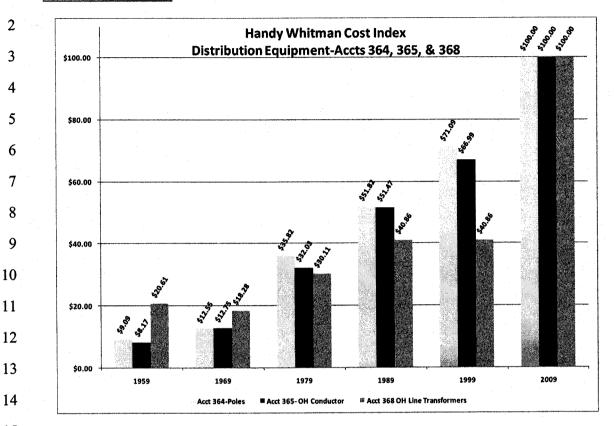
The only way to ensure that retail rates are just, fair, and reasonable is for the utility plant investment that is being used to serve customers be properly reflected in retail rates, net of appropriate offsets. This makes it necessary for the Company to pro form plant investment that is in service after the historical test year, and will be in service during the rate year so that rate base for the pro forma rate year is representative of the level of investment used to serve customers. The Company's pro in this case properly reflect forma adjustments and include adjustments to ensure offsets, matching with test period loads.

- Q. What is the historical and projected level of
- 2 annual capital spending for Avista?
- 3 A. Avista's annual capital requirements have
- 4 steadily increased from approximately \$130 million in 2005
- 5 to approximately \$250 million in 2011. Capital
- 6 expenditures of approximately \$482 million are planned for
- 7 2011-2012 for customer growth, investment in generation
- 8 upgrades and transmission and distribution facilities, as
- 9 well as necessary maintenance and replacements of our
- 10 natural gas utility systems. Capital expenditures of
- 11 approximately \$1.2 billion are planned for the five year
- 12 period ending December 31, 2015. Schedule 1 of Exhibit 11
- 13 reflects this trend that Avista has experienced and what is
- 14 planned for in the near future.
- 15 Q. What is driving the significant investment in new
- 16 utility plant?
- 17 A. As Company witnesses Mr. Kinney and Mr. Lafferty,
- 18 in particular, explain in their testimony, the Company is
- 19 being required to add or upgrade new generation facilities,
- 20 expand transmission and distribution facilities due in part
- 21 to customer growth in our service area, reliability
- 22 requirements, and needed capacity upgrades. Other issues
- 23 driving the need for capital investment include an aging
- 24 infrastructure, physical degradation, and municipal
- 25 compliance issues (e.g., street/highway relocations), etc.
- While the price escalation experienced in recent years
- 27 for the cost of materials (concrete, copper, steel, etc.)

- 1 has subsided, the cost of materials and equipment is still
- 2 orders of magnitude higher than what they were even a few
- 3 years ago, causing the cost of these new facilities to be
- 4 significantly higher than in the past. Accordingly, the
- 5 annual costs associated with the new facilities will be
- 6 significantly higher than the annual costs of the Company's
- 7 facilities that are being replaced or upgraded.
- 8 Q. What data is available that depicts the
- 9 significant increase in the cost of utility plant assets
- 10 that have been added in recent years as compared to the
- 11 cost of the facilities being replaced?
- 12 A. Using the Handy-Whitman Index Manual³, the
- 13 Company analyzed several major categories of plant.
- 14 Schedule 2 of Exhibit 11 depicts the increases in costs of
- 15 transmission substations, transmission equipment,
- 16 distribution substations, and distribution equipment that
- 17 the utility industry has experienced over the past fifty
- 18 years. These charts show what these categories of plant
- 19 have cost historically on a relative scale. For example,
- 20 on Page 4 of Schedule 2, and also shown in Illustration 2
- 21 below, distribution poles fifty years ago would have a cost
- 22 of only 9% of the current replacement cost.

³ "The Handy-Whitman Index of Public Utility Construction Costs", published by Whitman, Requardt and Associates, Baltimore, Maryland. The Handy-Whitman Indexes of Public Utility Construction Costs show the level of costs for different types of utility construction. Separate indices are maintained for general items of construction, such as reinforced concrete, and specific items of material or equipment, such as pipe or turbo-generators. Handy-Whitman Index numbers are used to trend earlier valuations and original cost at prices prevailing at a certain date.

Illustration 2



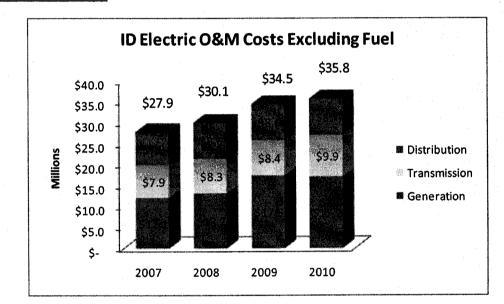
The chart above, and those on Schedule 2, show that the cost of the same equipment and facilities that are being added today are multiple times more expensive than those facilities installed in the past. Our retail rates are "cost-based" and reflect the low cost of the old equipment serving customers, when the equipment is replaced, it requires an increase in rates to reflect the much higher cost of the new equipment.

Q. With respect to Avista's proposed pro forma capital additions, would there be some operation and maintenance (O&M) savings associated with the replacement of some of the aging equipment with new equipment?

1 A. Not when you look at the total utility as a 2 whole, which is how ratemaking is done.⁴

On a net basis, we will continue to experience O&M costs to maintain a system that continues to age. Our O&M costs are continuing to go up over time, not down, as shown in Illustration 3 below.

Illustration 3



At some point our facilities approach the end of their useful lives and need to be replaced before they fail. Our general practice is to attempt to replace our aging equipment before it fails, because it is not only less costly to replace this equipment on a structured, planned basis, but it also results in more reliable service to

⁴ As described below, all of the capital that was pro formed was reviewed for any offsets and any specific offset that was identified was included in the filing as a separate restating adjustment (O&M Savings Adjustment) as a reduction to O&M costs.

- 1 customers, which is expected by all utility stakeholders.
- 2 If our practice were to avoid replacing utility equipment
- 3 until it failed, the reliability of our system would
- 4 suffer.
- 5 Therefore, it is imperative that we continue every
- 6 year to reinvest and upgrade a portion of our utility
- 7 system, in addition to the investments to meet mandatory
- 8 reliability requirements, so that our system will continue
- 9 to provide reliable service.
- 10 The reinvestment and upgrades actually serve, to a
- 11 large extent, to allow the Company to avoid additional
- 12 costs in the future associated with maintenance not to
- 13 reduce the overall level of existing O&M costs. Mr. Kinney
- 14 provides additional testimony in this area.

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III. DESCRIPTION OF CAPITAL PROJECTS

- 17 Q. Please provide a listing of the 2011 capital
- 18 projects that were pro formed in this filing.
- 19 A. Exhibit No. 11, Schedule 3, Page 1, details the
- 20 capital projects that will be transferred to plant in
- 21 service in 2011 and included in this filing. A listing
- 22 and/or description of the capital projects and their system
- 23 costs that will transfer to plant in service in 2011 and
- 24 that are included in this filing follows:

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Generation (\$25.280 million - system):

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The electric generation projects that will transfer to plant in service are described in detail in Mr.

Lafferty's direct testimony. A listing of these projects follows: 3 4 Thermal - Kettle Falls Capital Projects - \$731,000 5 Thermal - Colstrip Capital Projects - \$6,926,000 6 Thermal - Other Small Capital Projects - \$156,000 7 Hydro - Cabinet Gorge Upgrade - \$800,000 8 Hydro - Noxon Capital Projects - \$1,000,000 9 Hydro - 2011 Noxon Unit #2 Upgrade - \$9,110,000 10 Hydro - Clark Fork PME Agreements - \$1,468,000 11 Hydro - Spokane PME Agreements - \$2,243,000 12 Hydro - Other Small Capital Projects - \$1,874,000 13 Other - CS2 Capital Projects - \$630,000 14 Other - Other Small Generation Projects - \$342,000 15 16 17 Electric Transmission (\$26.959 million - system): 18 The electric transmission projects that will transfer 19 to plant in service are described in detail in Mr. 20 Kinney's direct testimony. A listing of these 21 projects and system costs follows: 22 23 Reliability Compliance Projects: 24 Spokane-CDA 115 kV Line Relay Upgrades - \$1,000,000 25 SCADA Replacement - \$625,000 26 System-Replace/Install Capacitor Banks - \$400,000 27 Moscow Sub Rebuild - \$400,000 28 Bronx Cabinet 115 kV Substation Rebuild - \$2,000,000 29 West Plains Transmission Reinforcement - \$2,300,000 30 31 Environmental Regulation Project: 32 Beacon Storage Yard Oil Containment - \$1,020,000 33 34 Contractual Required Projects: 35 Colstrip Transmission - \$533,000 36 Tribal Permits - \$325,000 37 38 Reliability Improvement Projects: 39 Idaho Road Substation - \$1,750,000 40 Hatwai - N. Lewiston 230 kV Re-Insulate - \$250,000 41 12F2 & PVW 241 Feeder Tie - \$265,000 42 43 Replacement Transmission Projects: 44 Power Transformer Transmission - \$3,250,000 45 Transmission Minor Rebuilds - \$2,750,000 46 Power Circuit Breakers - \$1,600,000 47 Otis Orchards - 115 kV Breaker and Line Relay 48 Replacement - \$730,000 49 Noxon Rapids B Bank GSU Replacements - \$5,874,000 50 51 <u>Transmission Asset Management Projects</u> - \$1,887,000

planned projects include: roof replacements,

system replacement at some branch offices, energy efficiency window and lighting projects, security projects, asphalt overlays and replacement, as well as some capital repair projects in existing buildings.

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Stores Equipment - \$402,000 Equipment utilized in warehouses and/or investment recovery operations throughout the service territory. This includes equipment such as forklifts, man lifts, shelving, cutting/binding machines, etc.

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Tools, Lab & Shop Equipment - \$1,300,000 Expenditures in this category include all large tools and instruments used throughout the Company for gas and/or electric construction and maintenance work, distribution, transmission, or generation operations, telecommunications, and some fleet equipment (hoists, winch, etc) not permanently attached to the vehicle.

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HVAC Renovation Project - \$5,541,000 The heating, ventilating, and air conditioning systems throughout the Spokane Central Operating Facilities are approximately fifty years old and are in need of In 2007, the Company initiated a multireplacement. year HVAC renovation project that involves replacing central air handling units and distribution systems in three buildings - the Spokane Service Center, the general office building, and the cafeteria auditorium The building envelope of the general office building. building was also renovated with high efficiency glass insulation. The project will also achieve asbestos abatement and life safety (fire sprinkler) additions. New controls will also be installed which will enable energy conservation. Present estimates indicate cost savings of approximately \$430,000 per year in energy use, a 36% reduction in energy costs once all phases have been completed, currently planned to be completed in 2013. The 2011 project pro formed into this case will produce approximately \$31,000 per year (system) in reduced energy costs, which have been pro formed as a reduction to O&M costs. The Company has included an additional \$31,000 in O&M savings related to the 2010 portion of this capital project that was completed in late-2010.

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WSDOT Highway Preservation/Maintenance of Right of Ways - \$350,000
In order to operate our electric system within State highway rights of way, the Company needs to preserve/maintain right of ways. Existing right of ways have expired and Avista must seek new agreements with the State or risk penalties or non-approval by the State.

Colville Service Center - \$5,400,000 The construction of a new service center was specific to the Washington jurisdiction and has not been included in the Idaho electric revenue requirement in

this case.

Other Small Projects - \$1,136,000 These projects include office furniture additions and replacements, communication and security initiatives, radio equipment, telephone systems, office and other general facility upgrades.

Transportation (\$9.468 million - system):

Transportation Equipment - \$9,468,000 Expenditures are for the scheduled replacement of trucks, off-road construction equipment and trailers that meet the Company's quidelines for replacement including age, mileage, hours of use and overall This also includes additions to the fleet condition. for new positions or crews working to support the maintenance and construction of our electric natural gas operations.

Technology (\$24.073 million - system):

Information Technology Refresh Blanket - \$8,995,000 A program to replace obsolete technology according to Avista's refresh cycles that are generally driven by hardware/software manufacturer and industry trends to maintain business operations.

Information Technology Expansion Blanket - \$1,180,000 program to deliver technology associated with expansion of existing solutions.

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Avista Facility Management (AFM) Product Development Program - \$640,000 Deliver enhancements to the electric and natural gas Facility Management technology system.

Nucleus Product Development Program - \$480,000 Deliver enhancements to the Nucleus energy resource management technology system.

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Web Product Development Program - \$960,000 A program to deliver enhancements to the Customer based Web technology system.

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Business Application Refresh Program - \$1,188,000

This item is a program to upgrade critical business application that support small systems that are integral for the delivery of reliable electric and gas services to the customer. Examples of items in this program are upgrade to obsolete Itron PP4 meter reading system to Itron MVRS meter reading system, upgrade Microsoft BizTalk integration software to the current version, and upgrade of the SharePoint services Intranet to the current version.

Moducom Replacement - \$1,000,000
This project is to replace the critical crew communication system that facilitates the coordination of Avista's crews for the restoration, operations and installation of electric and gas services to our customers.

Microwave Replacement Project - \$2,813,000
The project is designed to replace the aging and no longer supported microwave equipment with a supported technology. These systems support the communication for protection and relaying of the electrical transmission systems that allow the reliable delivery of electricity throughout our service territory.

 Oracle R12 Upgrade - \$1,300,000
This project will provide the Company with a supportable financial application system which is integral for the operation of financially viable stable business this in turn allows us to continue to provide reliable electric and gas services to our customers.

AFM.net Upgrade - \$2,904,000 The Avista Facilities Management system, or AFM, provides electronic representation of all of the components of the gas and electric systems required for the safe and reliable delivery of electricity and natural gas to our customers. This system represents meters, poles, transformers and many other components representation. Our Distribution a geospatial Engineering and Operations areas depend upon the information in this system for the management of outage restoration, maintenance and operations of the and gas distributions systems. electrical project provides critical updates to the underlying technology of the system.

Other Small Technology Projects and Technology Minor Blankets - \$2,613,000 This item is intended to be used for small technology projects. These projects are small items that provide for improvements in how Avista provides services to

our customers. Examples of project approved under this program are adding new features and functions to the Claims system, adding an additional module to the Rate Case Software product, and adding additional features to the Contract Management system.

Jackson Prairie Storage (\$0.581 million - system):

Jackson Prairie Storage Project - \$581,000 These projects include various capital improvements that Avista and its partners will complete at Jackson Prairie facility in 2011.

Natural Gas Distribution (\$15.312 million - system):

Replace Deteriorated Pipe - \$1,052,000
This annual project will replace sections of existing natural gas piping that are suspect for failure or have deteriorated within the natural gas system. This project will address the replacement of sections of natural gas main that no longer operate reliably and/or safely. Sections of the natural gas system require replacement due to many factors including material failures, environmental impact, increase leak frequency, or coating problems. This project will identify and replace sections of main to improve public safety and system reliability.

Natural Gas Replacement Street/Highways - \$1,850,000 This annual project will replace sections of existing natural gas piping that require replacement due to relocation or improvement of streets or highways in areas where natural gas piping is installed. Avista installs many of its facilities in public right-of-way under established franchise agreements. Avista is required under the franchise agreements, in most cases, to relocate its facilities when they are in conflict with road or highway improvements.

Natural Gas Non-Revenue Blanket - \$2,900,000 This annual project will replace sections of existing natural gas piping that require replacement to improve the operation of the natural gas system but are not linked to new revenue. The project includes relocation main related to overbuilds, improvement equipment and/or technology to improve system operation and/or maintenance, replacement of obsolete facilities, replacement of main to improve cathodic performance, and projects to improve public safety and/or improve system reliability.

1 2 3 4	Roseburg, OR Reinforcement Project - \$3,700,000 This Oregon natural gas distribution project is not included in this filing.
5 6 7 8 9	North Clarkston, WA HP Reinforcement Project - \$2,200,000 This Washington natural gas distribution project is not included in this filing.
10 11 12 13 14	Other Small Projects - \$3,610,000 Please refer to my workpapers for detailed listing of projects.
15	Q. What are the 2012 capital projects that are pro
16	formed in this filing?
17	A. Exhibit No. 11, Schedule 3, Page 2, details the
18	capital projects that will be transferred to plant in
19	service in 2012 and included in this filing. A listing
20	and/or description of the capital projects and their system
21	costs that will transfer to plant in service in 2012 and
22	that are included in this filing follows:
23 24 25 26 27 28 29 30 31	Generation (\$34.362 million - system): The electric generation projects that will transfer to plant in service are described in detail in Mr. Lafferty's direct testimony. A listing of these projects follows: Thermal - Kettle Falls Capital Projects - \$1,000,000
32 33 34 35 36 37 38 39 40 41 42 43 44	Thermal - Colstrip Capital Projects - \$4,963,000 Thermal - Other Small Capital Projects - \$160,000 Hydro - Little Falls Capital Projects - \$2,300,000 Hydro - Post Falls Capital Projects - \$2,500,000 Hydro - 2012 Noxon Unit #4 Upgrade - \$8,757,000 Hydro - Clark Fork PME Agreements - \$1,437,000 Hydro - Spokane PME Agreements - \$1,105,000 Hydro - Other Small Capital Projects - \$952,000 Other - CS2 Capital Projects - \$10,400,000 Other - Other Small Generation Projects - \$788,000

1 Electric Transmission (\$22.407 million - system): 2 The electric transmission projects that will transfer 3 to plant in service are described in detail in Mr. 4 Kinney's direct testimony. A listing 5 projects and system costs follows: 6 7 8 Reliability Compliance Projects: 9 Spokane-CDA 115 kV Line Relay Upgrades - \$1,250,000 10 SCADA Replacement - \$450,000 11 System-Replace/Install Capacitor Banks - \$1,200,000 12 Moscow Sub Rebuild - \$3,870,000 13 Irvin - Millwood 115 kV Rebuild - \$1,150,000 14 Thornton Substation - \$4,900,000 15 Bronx Cabinet 115 kV Rebuild/Reconductor - \$1,500,000 16 17 Contractual Required Projects: 18 Colstrip Transmission - \$195,000 19 Tribal Permits - \$325,000 20 21 Replacement Transmission Projects: 22 Power Transformer Transmission - \$2,665,000 23 Transmission Minor Rebuilds - \$1,500,000 24 Power Circuit Breakers - \$1,200,000 25 26 <u>Transmission Asset Management Projects</u> - \$2,202,000 27 28 29 Electric Distribution (\$58.003 million - system): 30 31 The Idaho specific electric distribution projects 32 totaling \$7.940 million that will transfer to plant in 33 service are described in detail in Mr. Kinney's direct 34 testimony. A listing of these projects follows: 35 36 Power Transformer Distribution - \$350,000 37 Big Creek Substation - \$1,515,000 38 Blue Creek Substation - \$1,500,000 39 System-Dist Reliability-Improve Feeders - \$1,075,000 40 CDA East & North - Pullman & Lewis Clark - \$1,325,000 41 Pullman & Lewis Clark Distribution - \$600,000 42 Replace High Resistance Conductor - \$905,000 43 PCB Related Distribution Rebuilds - \$420,000 10th & Stewart - \$250,000 44 45 46 The electric distribution projects totaling \$24.943 million (system) that will transfer to plant in 47 48 service are described in detail in Mr. Kinney's direct 49 testimony. A listing of these projects follows: 50 51 Electric Distribution Minor Blanket - \$8,000,000

Wood Pole Replacement Program & Capital Distribution Feeder Repair - \$9,468,000 Electric Underground Replacement - \$3,675,000 Distribution Line Relocation - \$1,700,000 Failed Electric Plant - \$2,100,000

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The following electric distribution projects included on Exhibit No. 11, Schedule 3, are specific to the Washington jurisdiction and are not included in the Idaho electric revenue requirement in this case.

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Power Transformer Distribution - \$1,100,000 Replace High Resistance Conductor - \$2,112,000 PCB Related Distribution Rebuilds - \$2,400,000 Distribution Projects in Washington - \$11,104,000 Washington Smart Grid Distribution - \$8,404,000

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General (\$11.217 million - system):

Security Initiative - \$392,000

Various security measures including cameras and access controls for the office and branch facilities.

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Structures and Improvements - \$3,032,000 This is a group of capital maintenance projects that Spokane Facilities Management coordinates at the Facilities Central Operating and Avista branch facilities - offices and service centers. For 2012, planned projects include: roof replacements, acquisition for facility expansion, energy efficiency projects, security enhancement projects, overlays and replacement, construction of new storage buildings, as well as some capital repair projects in existing buildings.

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Stores Equipment - \$450,000 Equipment utilized in warehouses and/or investment recovery operations throughout the service territory. This includes equipment such as forklifts, man lifts, shelving, cutting/binding machines, etc.

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Tools, Lab & Shop Equipment - \$1,292,000 Expenditures in this category include all large tools and instruments used throughout the Company for gas and/or electric construction and maintenance work, distribution, transmission, or generation operations, telecommunications, and some fleet equipment (hoists, winch, etc) not permanently attached to the vehicle.

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HVAC Renovation Project - \$5,000,000 The heating, ventilating, and air conditioning systems throughout the Spokane Central Operating Facilities

are approximately fifty years old and are in need of In 2007, the Company initiated a multireplacement. year HVAC renovation project that involves replacing central air handling units and distribution systems in three buildings - the Spokane Service Center, the general office building, and the cafeteria auditorium building. The building envelope of the general office building was also renovated with high efficiency glass will also insulation. The project achieve asbestos abatement and life safety (fire sprinkler) New controls will also be installed which additions. will enable energy conservation. Present estimates indicate cost savings of approximately \$430,000 per year in energy use, a 36% reduction in energy costs once all phases have been completed, currently planned to be completed in 2013. The 2012 project pro formed into this case will produce approximately \$31,000 per year (system) in reduced energy costs, which have been pro formed as a reduction to O&M costs.

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WSDOT Highway Preservation/Maintenance of Right of Ways - \$500,000

In order to operate our electric system within State highway rights of way, the Company needs to preserve/maintain right of ways. Existing right of ways have expired and Avista must seek new agreements with the State or risk penalties or non-approval by the State.

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Other Small Projects - \$551,000 These projects include office furniture additions and replacements, communication and security initiatives, radio equipment, telephone systems, office and other general facility upgrades.

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Transportation (\$6.672 million - system):

Transportation Equipment - \$9,468,000 Expenditures are for the scheduled replacement of trucks, off-road construction equipment and trailers that meet the Company's guidelines for replacement including age, mileage, hours of use and overall condition. This also includes additions to the fleet for new positions or crews working to support the maintenance and construction of our electric and natural gas operations.

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Technology (\$32.682 million - system):

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Information Technology Refresh Blanket - \$6,254,000

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A program to replace obsolete technology according to Avista's refresh cycles that are generally driven by hardware/software manufacturer and industry trends to maintain business operations.

Information Technology Expansion Blanket - \$1,140,000 A program to deliver technology associated with expansion of existing solutions.

AFM Product Development Program - \$500,000 Deliver enhancements to the electric and natural gas Facility Management technology system.

Nucleus Product Development Program - \$480,000 Deliver enhancements to the Nucleus energy resource management technology system.

Web Product Development Program - \$650,000 A program to deliver enhancements to the Customer based Web technology system.

Business Application Refresh Program - \$500,000 This item is a program to upgrade critical business application that support small systems that are integral for the delivery of reliable electric and gas services to the customer. An example of this would be an upgrade of Human Resource system.

Moducom Replacement - \$500,000 This project is to replace the critical crew communication system that facilitates the coordination of Avista's crews for the restoration, operations and installation of electric and gas services to our customers.

Next Generation Radio Project - \$18,657,000 This project is refreshing Avista's 20 year old Land Mobile Radio (LMR) system that is used for critical crew communications during outage restoration and daily operations of maintaining the electric and gas distribution and transmission systems. Avista continues to maintain a private Land Mobile Radio system because the offerings available from public providers cannot provide communication throughout our rural service territory and as a portion of our nation's critical infrastructure it is imperative that Avista have a communication system that will operate in the event of a disaster to help safeguard the general public.

CIS Replacement - \$3,000,000

This project will enhance the integration capability supporting expanded service oriented architecture in

commercial off the shelf software. This is part of a larger effort to reduce the costs of custom written application solutions which will improve our ability to provide customer more information about their energy usage and reduce our costs of delivering services to Avista's customers.

Other Small Technology Projects and Technology Minor Blankets - \$1,001,000

This item is intended to be used for small technology projects. These projects are small items that provide for improvements in how Avista provides services to our customers. The specific projects will be defined during the annual budgeting cycle.

Jackson Prairie Storage (\$0.604 million - system):

Jackson Prairie Storage Project - \$604,000 These projects include various capital improvements that Avista and its partners will complete at Jackson Prairie facility in 2012.

Natural Gas Distribution (\$20.285 million - system):

Replace Deteriorated Pipe - \$3,000,000
This annual project will replace sections of existing natural gas piping that are suspect for failure or have deteriorated within the natural gas system. Sections of the natural gas system require replacement due to many factors including material failures, environmental impact, increase leak frequency, or coating problems. This project will identify and replace sections of main to improve public safety and system reliability.

Natural Gas Replacement Street/Highways - \$2,060,000 This annual project will replace sections of existing natural gas piping that require replacement due to relocation or improvement of streets or highways in areas where natural gas piping is installed. Avista installs many of its facilities in public right-of-way under established franchise agreements. Avista is required under the franchise agreements, in most cases, to relocate its facilities when they are in conflict with road or highway improvements.

Natural Gas Non-Revenue Blanket - \$3,664,000 This annual project will replace sections of existing natural gas piping that require replacement to improve the operation of the natural gas system but are not directly linked to new revenue. The project includes

relocation of main related to overbuilds, improvement in equipment and/or technology to improve system operation and/or maintenance, replacement of obsolete facilities, replacement of main to improve cathodic performance, and projects to improve public safety and/or improve system reliability.

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Highway 95 Relocation Project - \$1,250,000 This project will replace approximately 33,000 feet of inch diameter intermediate pressure existing 3 polyethylene (PE) main by installing a new 6 inch diameter intermediate pressure PE main along Highway 95 from Chilco Road, ending in Athol, Idaho. ITD notified by been (Idaho Transportation Department) that the existing natural gas main is in conflict with the construction and widening of Hwy 95. The existing main is installed in the Hwy 95 road right of way. Relocation of the Avista natural gas main is required in order for ITD to make the road The existing 3 inch main will be improvements. replaced with 6 inch PE main to also accommodate future growth along the pipe route and improve reliability by looping the distribution system.

Old Highway 95 Relocation Project - \$3,000,000 This project will relocate approximately 15,000 feet of existing steel HP main and approximately 8,300 feet of existing PE main by installing a new 6 inch HP main and new 6 inch PE main along Old Highway 95 from the vicinity of Highway 53 to Chilco Rd. Existing regulator stations No.604 and No. 226 will be tied the new piping. The Idaho Transportation Department will be rebuilding Old Highway 95 from Highway 53 to Chilco Rd. The relocation of existing HP and PE facilities will be required to The existing facilities accommodate the new roadway. are located within the Lakes Highway District rightof-way.

Klamath Falls, OR Lateral Project - \$2,500,000 This Oregon natural gas distribution project is not included in this filing.

Isolated Steel Replacement Project - \$1,125,000 The Company is implementing a special cathodic protection program for the purpose of finding and addressing isolated steel in its natural gas piping systems. This program is described further by Company witness Mr. Kopczynski in his testimony.

Other Small Projects - \$3,686,000 Please refer to my workpapers for detailed listing of projects.

IV. SUMMARY OF ADJUSTMENTS

- Q. What was the net impact to electric rate base for the capital adjustments pro formed in this case?
- 4 A. Electric net rate base for capital investment
- 5 increased \$25,827,000, from \$594,111,000 to \$619,938,000.
- 6 Table 2 below summarizes the adjustments included in the
- 7 case.

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Table 2

(\$000's)		Adju	ıstment 1		Adjusti	nent 2	4	Adjustment	3	Adjus	tment 4	
						2011						
					Adjust	Capital	Adjust	2011	2012			
4					12/31/10	Additions	12/31/10	Capital	Capital	Nox	on 2011	
				Rate Base	Vintage to	to	Vintage	Additions	Additions	and	2012	Pro Form
	Rate Base	Adj	ust 2010	12/31/10	12/31/11	12/31/11	to 2012	to 2012	to 2012	Upg	grades	Rate Ba
	2010 AMA	to E	OP Basis	EOP	EOP	EOP .	AMA	AMA	AMA	201	2 AMA	2012 AN
Plant	\$1,054,173	\$	21,656	\$1,075,829	\$ -	\$ 46,008	\$ -	\$ -	\$ 16,808	\$	5,081	\$1,143,7
A/D	(356,580)	(6,873)	(363,453)	(29,495)	(1,128)	(14,747)	(1,172)	(431)		(121)	(410,5
DFIT	(103,482)	(3,140)	(106,622)	(3,063)	(745)	(1,522)	(605)	(374)		(310)	(113,2
Rate Base	\$ 594,111	\$	11,643	\$ 605,754	\$ (32,558)	\$ 44,135	\$(16,269)	\$ (1,777)	\$ 16,003	\$	4,650	\$ 619,9

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Q. What was the net impact to natural gas rate base for the capital adjustments pro formed in this case?

A. Natural gas net rate base for capital investment decreased \$3,480,000, from \$96,276,000 to \$92,796,000.

19 Table 3 below summarizes the adjustments included in the 20 case.

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Table 3

(\$000's)		Adjı	istment 1				Adjustm	ent	2	1.0	Α	djus	tment	3			
	·								2011								
							Adjust		apital		djust		2011		2012		
						12	2/31/10	Αd	ditions	12	/31/10		apital		apital		^o ro
		Adj	ust 2010	R	ate Base	Vir	ntage to		to	V	intage	Add	ditions	Αd	ditions	Fo	rmed
	Rate Base	t	o EOP	1	2/31/10	12	2/31/11	12	/31/11	to	2012	to	2012	to	2012	Rate	e Base
	2010 AMA		Basis		EOP		EOP		EOP		AMA	A	MA		AMA	201	2 AM
Plant	\$172,698	\$	1,859	\$	174,557	\$	-	\$	4,476	\$	-	\$	- '	\$	2,798	\$18	31,831
A/D	(56,749)		(1,059)		(57,808)		(4,909)		(216)		(2,454)		(204)		(84)	(6	55,675
DFIT	(19,673)		(1,297)		(20,970)		(1,512)		(136)		(548)		(103)		(91)	(2	23,360
Rate Base	\$ 96,276	\$	(497)	\$	95,779	\$	(6,421)	\$	4,124	\$	(3,002)	\$	(307)	\$	2,623	\$ 9	2,79

8 A. The Company used the same general approach that 9 was used in the two previous general rate cases. 5 Company 10 witness Ms. Andrews includes the following four 11 adjustments:

2010 Capital Adjustment - Adjusts the 2010 test period rate base stated on an AMA basis to an EOP basis. The revenue-producing distribution plant for the 2010 capital additions was not adjusted to EOP, to maintain the matching of revenues and costs associated with these assets.

2011 Capital Adjustment - First, the plant that was in service at December 31, 2010, was depreciated through 2011, adjusting accumulated depreciation and DFIT to a December 31, 2011 EOP basis. Second, 2011 capital additions, excluding the revenue-producing distribution plant and the 2011 Noxon Unit #2 upgrade, discussed below, was pro formed

on a December 31, 2011 EOP basis.

⁵ In previous year's cases, the Company's case pro formed capital to an end-of period basis for one year subsequent to the test year. For the current case, the Company pro formed capital to an average-of-monthly averages basis for the rate year.

- 1 2012 Capital Adjustment First, the plant that was in
- 2 service at December 31, 2010, was depreciated through 2012,
- 3 adjusting accumulated depreciation and DFIT to a 2012 AMA
- 4 basis. Second, the 2011 pro formed capital additions were
- 5 depreciated through 2012, adjusting accumulated
- 6 depreciation and DFIT to a 2012 AMA basis. Third, 2012
- 7 capital additions, excluding the revenue-producing
- 8 distribution plant and the 2012 Noxon Unit #4 upgrade,
- 9 discussed below, was pro formed on a 2012 AMA basis.
- 10 Noxon Upgrades Adjustment The 2011 Noxon Unit #2
- 11 generation plant upgrade and the 2012 Noxon Unit #4
- 12 generation plant upgrade were pro formed on a December 31,
- 13 2012 AMA basis. As explained by Mr. Storro, the Company
- 14 has been upgrading one Noxon unit each year at its Noxon
- 15 generating facility. The upgrade for Unit #2 was completed
- 16 in May 2011. The upgrade for Unit #4, which will be
- 17 completed in May 2012, is also pro formed into this case.
- 18 Fifty percent of the additional generation and costs have
- 19 been included in the Aurora power cost model to provide a
- 20 proper matching of revenues and costs. The Company
- 21 included fifty percent of the additional generation and
- 22 costs for the approximate half-year that it will be in
- 23 service during the 2012 pro forma period.
- Q. What other impact does the 2011 and 2012 capital
- 25 additions have in this case in addition to the rate base
- 26 impact?

- 1 A. Depreciation expense and property taxes have been
- 2 computed for the 2011 and 2012 plant vintages for the pro
- 3 forma rate year on an AMA basis for 2012.
- 4 Q. How were the offsets determined for the pro
- 5 formed plant investment?
- 6 A. Each capital addition was analyzed to determine
- 7 any offsets (e.g. reduced O&M costs, reduced load losses,
- 8 etc.). Maintenance records were reviewed to determine
- 9 whether any specific maintenance costs were incurred in the
- 10 test period that would be reduced or eliminated by the
- 11 investment at the facility. For transmission projects,
- 12 analyses were conducted to determine the amount of
- 13 potential load loss savings that would be achieved. Those
- 14 costs were quantified and included as a reduction to O&M
- 15 costs in the O&M Savings restating adjustment included by
- 16 Ms. Andrews in the revenue requirement.
- In addition, the output from generation assets is
- 18 included in the Aurora power cost model. Therefore, to the
- 19 extent that the additional investments serve to either
- 20 preserve or increase generation from the generation
- 21 projects, the benefits are reflected in the Aurora model.
- Q. What is the rationale behind the removal of
- 23 capital expenditures for connecting new customers?
- 24 A. The pro forma capital expenditures for 2011 and
- 25 2012 that the Company included in this filing excludes
- 26 distribution related capital expenditures made that are
- 27 associated with connecting new customers to the Company's

- 1 system. The Company recognizes the fact that new customers
- 2 provide incremental revenue that helps offset the revenue
- 3 requirements of the distribution related capital additions
- 4 that the Company incurs to provide service to those
- 5 customers. The adjustments discussed above completely
- 6 eliminated the AMA 2010, the EOP 2011, and the EOP 2012
- 7 capital activity related to new customer connections in
- 8 order to avoid an unintended mismatch of revenues exceeding
- 9 the cost to serve customers.

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11 <u>V. CONCLUSION</u>

- 12 Q. What is the impact of the restating and pro forma
- 13 capital investment adjustments?
- 14 A. The proposed adjustments will result in a closer
- 15 matching of revenues to cost of service at the time new
- 16 rates go into effect at the conclusion of this general rate
- 17 proceeding. Without the proposed adjustments, the Company
- 18 will not have the opportunity to earn its allowed rate of
- 19 return on investment during the rate year.
- 20 Q. Does this conclude your pre-filed direct
- 21 testimony?
- 22 A. Yes, it does.

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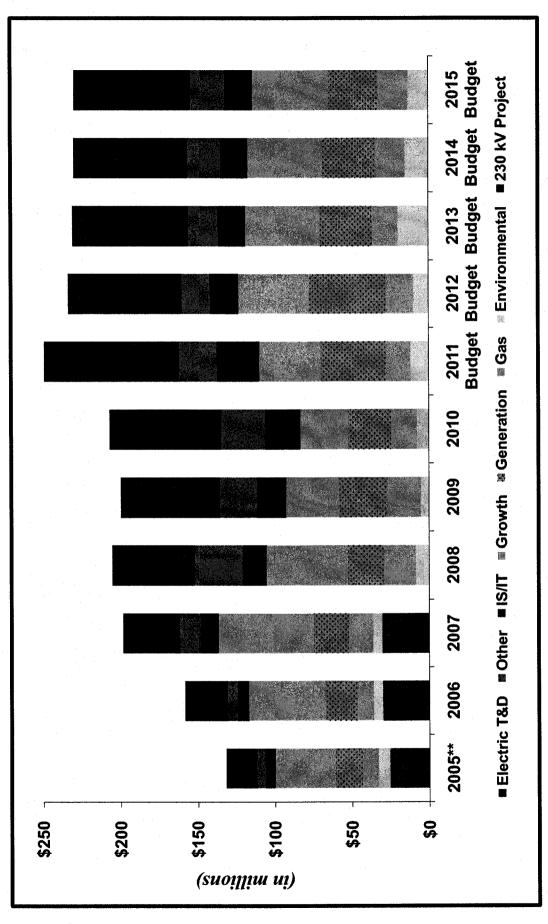
BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. AVU-E-11-01
OF AVISTA CORPORATION FOR THE	.)	CASE NO. AVU-G-11-01
AUTHORITY TO INCREASE ITS RATES)	
AND CHARGES FOR ELECTRIC AND)	
NATURAL GAS SERVICE TO ELECTRIC)	EXHIBIT NO. 11
AND NATURAL GAS CUSTOMERS IN THE)	
STATE OF IDAHO)	DAVE B. DEFELICE
	١.	

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

Capital Expenditures



** 2005 excludes \$57.5 M for the purchase of the second half of Coyote Springs 2 and \$17.8 M for the office building purchase.

Case Nos. AVU-E-11-01 & AVU-G-Exhibit No. 11

D. DeFelice, Avista Schedule 1, p. 1 of 1

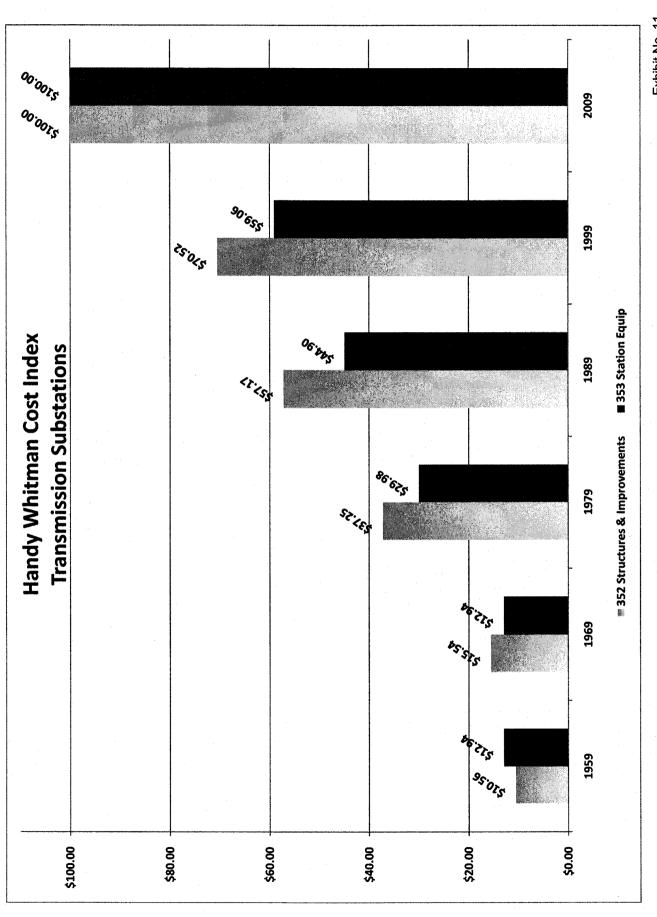


Exhibit No. 11
Case Nos. AVU-E-11-01 and AVU-G-11-01
D. DeFelice, Avista
Schedule 2, Page 1 of 4

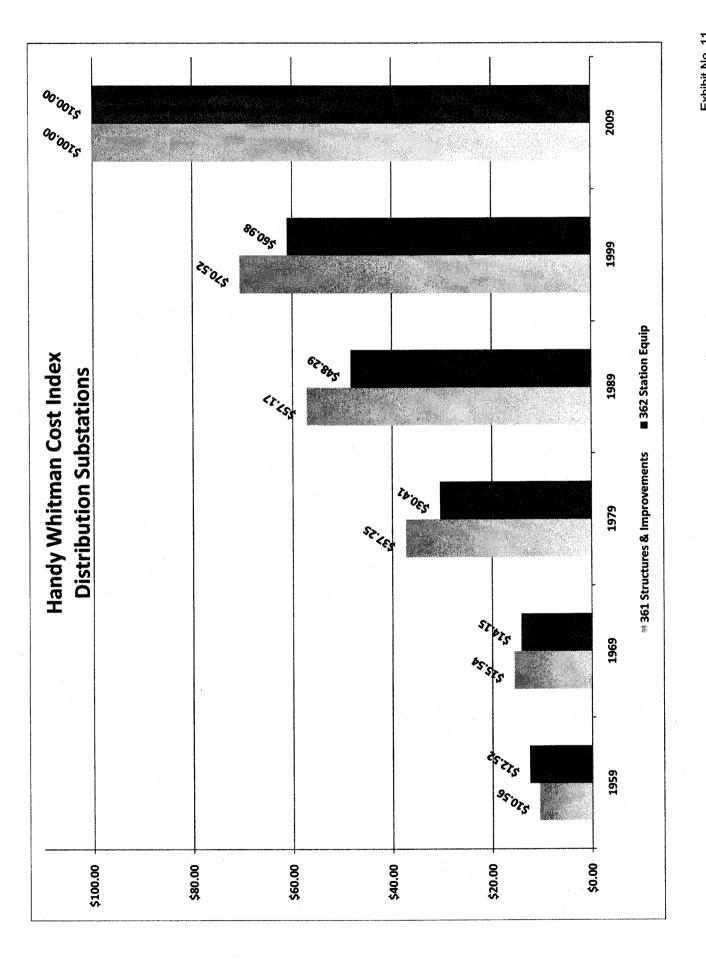
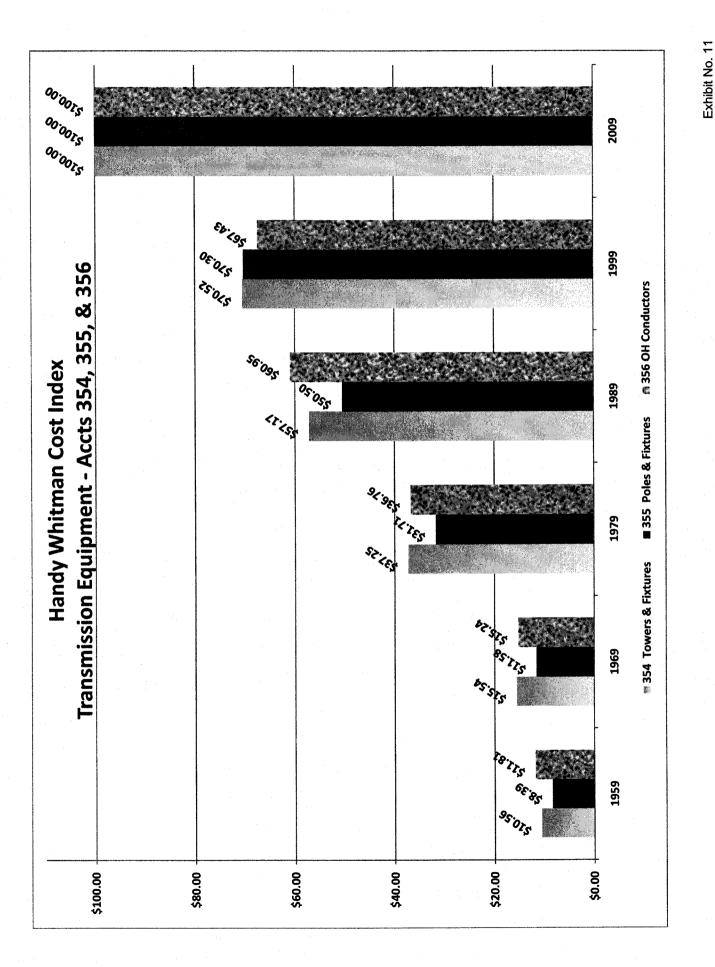
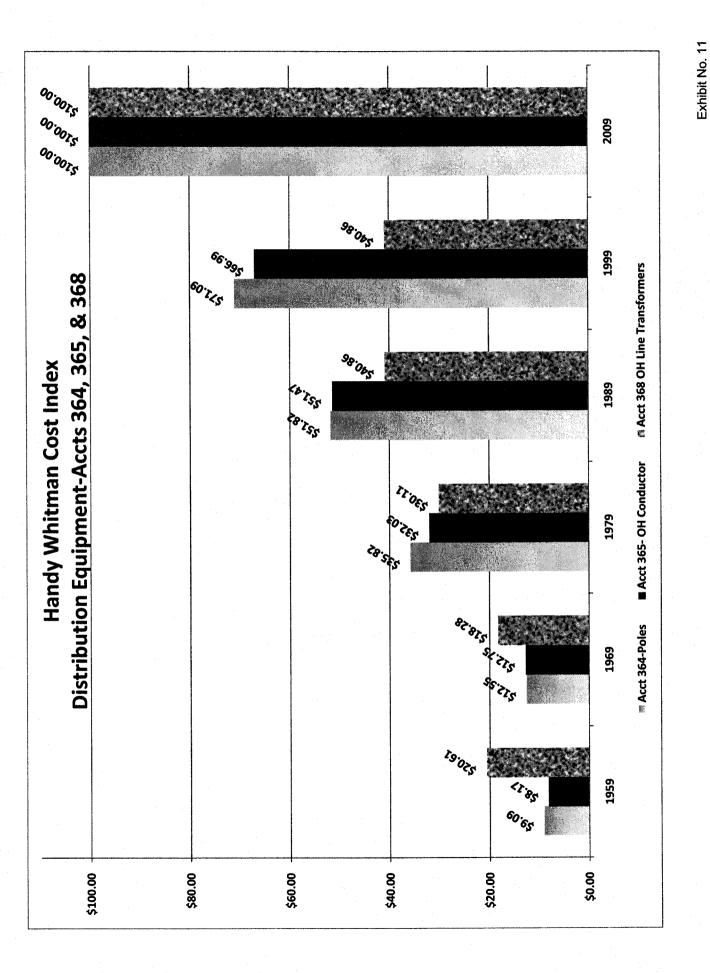


Exhibit No. 11
Case Nos. AVU-E-11-01 and AVU-G-11-01
D. DeFelice, Avista
Schedule 2, Page 2 of 4



Case Nos. AVU-E-11-01 and AVU-G-11-01

D. DeFelice, Avista
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Case Nos. AVU-E-11-01 and AVU-G-11-01
D. DeFelice, Avista
Schedule 2, Page 4 of 4

Avista 2011 Capital Additions Detail (System)

	\$ (000's)		\$ (000's)
Generation:		General:	
Thermal - Kettle Falls Capital Projects	731	Security Initiative	37
Thermal - Colstrip Capital Additions	6,926	Structures & Improvements	3,50
Thermal - Other small projects	156	Stores Equipment	40
Hydro - Cabinet Gorge Capital Projects	800	Tools Lab & Shop Equipment	1,30
Hydro - Noxon Capital Projects	1,000	COF HVAC Improvement	5,54
Hydro - 2011 Noxon Unit #2 Upgrade *	9,110	WSDOT Highway Franchise Consolidation	35
Hydro - Clark Fork Implement PME Agreements	1,468	Colville Service Center - WA	5,40
lydro - Spokane Implement PME Agreements	2,243	Other small general projects	1,13
Hydro - Other small projects	1,874		18,00
Other - CS2 Captital Projects	630		
Other - Other small generation projects	342	Transportation:	
	25,280	Transportation Equipment	9,46
Electric Transmission:			
Spokane-CDA 115 kV Line Relay Upgrades	1,000	Technology:	
SCADA Replacement	625	Information Technology Refresh Blanket	8,99
System-Replace/Install Capacitor Banks	400	Information Technology Expansion Blanket	1,18
Moscow 230 kV Substation Rebuild	400	AFM Product Development Program	64
Bronx-Cabinet 115 kV Rebuild/Reconductor	2,000	Nucleus Product Development Program	48
West Plains Transmission Reinforcements	2,300	Web Product Development Program	96
Beacon Storage Yard Oil Containment	1,020	Business Application Refresh Program	1,18
Colstrip Transmission Minor Rebuild	533	Moducom Replacement	1,00
Cribal Permits	325	Microwave Replacement Project	2,81
daho Road Subsation	1,750	Oracle R12 Upgrade	1,30
Hatwai-N. Lewsiston 230 kV Re-Insulate	250	AFM.net Upgrade	2,90
EFM 12F2 & PVW 241 Feeder Tie	265	Other small technology projects	2,61
Power Transformers - Transmission	3,250	omer smarr teemieregy projects	24,07
Fransmission Minor Rebuilds	2,750		21,07
Power Circuit Breakers	1,600	Gas Storage:	
Otis Orchards 115kV Breaker and Line Relay Replacement	730	Jackson Prairie Storage	58
Noxon Rapids B Bank GSU Replacement	5 , 874	Jackson Flante Storage	
	-	Natural Gas Distribution:	
Asset Management Replacement Program	1,887		1,05
Electric Distribution:	26,959	Replace Deteriorating Gas System	1,85
Power Transformer Distribution	1.250	Gas Replace-St&Hwy	2,90
	1,350	Gas Distribution Non-Revenue Blanket	
Appleway Substation - ID	4,200	Roseburg, OR Reinforcement	3,70
Deary Substation - ID	1,615	North Clarkston, WA HP Main Reinforce Project	2,20
Sys-Dist Reliability-Improve Fdrs - ID	925	Other small distribution projects	3,61
EFM 12F2 & PVW 241 Feeder Tie	360		15,31
CDA East & North - Pullman & Lewis Clark - ID	1,025	m. IV. n	108 10
Replace High Resistance Conductor	2,491	Total Non-Revenue Capital	185,40
PCB Related Distribution Rebuilds	2,500		
Distribution Projects in Washington	8,700	Growth/Revenue - Producing	40,00
Electric Distribution Minor Blanket	8,000		
Wood Pole Replacement Program and Capital Dist Fdrs	8,900		
Electric Underground Replacement	3,500	Total Capital Additions in 2011	225,40
Distribution Line Relocation	1,700		
Failed Electric Plant	2,000		
Washington Smart Grid Distribution Projects	18,461		
	65,727		

Avista 2012 Capital Additions Detail (System)

	\$ (000's)		\$ (000's)
Generation:		General:	
Thermal - Kettle Falls Capital Projects	1,000	Security Initiative	392
Thermal - Colstrip Capital Additions	4,963	Structures & Improvements	3,032
Thermal - Other small projects	160	Stores Equipment	450
Hydro - Little Falls Capital Projects	2,300	Tools Lab & Shop Equipment	1,29
Hydro - Post Falls Capital Projects	2,500	COF HVAC Improvement	5,00
Hydro - 2012 Noxon Unit #4 Upgrade *	8,757	WSDOT Highway Franchise Consolidation	500
Hydro - Clark Fork Implement PME Agreements	1,437	Other small general projects	55
Hydro - Spokane Implement PME Agreements	1,105		11,21
Hydro - Other small projects	952		
Other - CS2 Captital Projects	10,400	Transportation:	
Other - Other small generation projects	788	Transportation Equipment	6,67
	34,362		-
Electric Transmission:		Technology:	
Spokane-CDA 115 kV Line Relay Upgrades	1,250	Information Technology Refresh Blanket	6,25
SCADA Replacement	450	Information Technology Expansion Blanket	1,14
System-Replace/Install Capacitor Banks	1,200	AFM Product Development Program	50
Moscow 230 kV Substation Rebuild	3,870	Nucleus Product Development Program	48
Irvin - Millwood 115 kV Rebuild	1,150	Web Product Development Program	65
Thorton Substation	4,900	Business Application Refresh Program	- 50
Bronx - Cabinet 115 kV Rebuild/Reconductor	1,500	Next Generation Radio	18,65
Colstrip Transmission Minor Rebuild	195	Moducom Replacement Project	50
Tribal Permits	325	CIS Replacement	3,00
Power Transformers - Transmission	2,665	Other small technology projects	1,00
Transmission Minor Rebuilds	1,500	omer man tourners gy projects	32,68
Power Circuit Breakers	1,200		
Asset Management Replacement Program	2,202	Gas Storage:	
Asset Management response in Trogram	22,407	Jackson Prairie Storage	60
Electric Distribution:			
Power Transformer Distribution	1,450	Natural Gas Distribution:	
Big Creek Substation - ID	1,515	Replace Deteriorating Gas System	3,00
Blue Creek Substation - ID	1,500	Gas Replace-St&Hwy	2,06
Sys-Dist Reliability-Improve Fdrs - IE	1,075	Gas Distribution Non-Revenue Blanket	3,66
Tenth & Stewart	250	Highway 95 Relocation - ID	1,25
CDA East & North - ID	1.325	Old Highway 95 Relocation - ID	3,00
Pullman & Lewis Clark - ID	600	Klamath Falls Lateral - OR	2,50
Replace High Resistance Conductor	3,017	Isolated Steel Replacement	1,12
PCB Related Distribution Rebuilds	2,820	Other small distribution projects	3,68
Distribution Projects in Washington	11,104	#	20,28
Electric Distribution Minor Blanket	8,000		
Wood Pole Replacement Program and Capital Dist Fdrs	9,468	Total Non-Revenue Capital	186,23
Electric Underground Replacement	3,675	committee conprise	
Distribution Line Relocation	1,700	Growth/Revenue - Producing	46,09
Failed Electric Plant	2,100	Grownin Revenue - 1 rougeing	
Washington Smart Grid Distribution Projects	8,404	T-4-1 C4-1 A 144 I- 2012	222.22
	58,003	Total Capital Additions in 2012	232,32