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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	
OF AVISTA CORPORATION FOR THE)	CASE NO. AVU-G-21-01
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)	JOEL C. ANDERSON
)	

FOR AVISTA CORPORATION

(NATURAL GAS ONLY)

1 **I. INTRODUCTION**

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

4 A. My name is Joel C. Anderson. My business address is 1411 East Mission
5 Avenue, Spokane, Washington. I am employed as a Regulatory Analyst in the Regulatory
6 Affairs Department.

7 **Q. Please describe your educational background and professional**
8 **experience.**

9 A. I am a 2005 graduate of Eastern Washington University with a bachelor's
10 degree in Business Administration, majoring in Finance. In 2012, I became a Certified Public
11 Accountant in the State of Washington. I joined the Company in January 2013, after spending
12 seven years working in various accounting positions in the banking industry. I started with
13 Avista as an Internal Auditor. In January 2016, I joined the Regulatory Affairs Department
14 as a Regulatory Analyst. In my current role as a Regulatory Analyst, I am responsible for the
15 Company's natural gas cost of service studies in all jurisdictions, among other things.

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

17 A. My testimony and exhibits will cover the Company's natural gas revenue
18 normalization adjustment and cost of service study performed for this proceeding. A table of
19 contents for my testimony is as follows:

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1 **Q. Are you sponsoring any Exhibits in this case?**

2 A. Yes. I am sponsoring Exhibit No. 17, Schedule 1 which includes a narrative
3 of the natural gas cost of service study process, and Schedule 2, the natural gas cost of service
4 study summary results.

5 **Q. Were these Exhibits prepared by you or under your direction?**

6 A. Yes, they were.
7

8 **II. NATURAL GAS REVENUE NORMALIZATION**

9 **Q. Would you please describe the natural gas revenue adjustment included**
10 **in Company witness Ms. Andrews' pro forma results of operations?**

11 A. Yes. Similar to the electric revenue normalization adjustment sponsored by
12 Company witness Ms. Knox, the natural gas revenue normalization adjustment represents the
13 difference between the Company's actual recorded retail revenues during the 12-months
14 ended December 2019 test period, and retail revenues on a normalized (pro forma) basis. The
15 adjustment includes the re-pricing of pro forma sales and transportation volumes at present
16 rates using pro forma sales volumes that have been adjusted for unbilled sales, abnormal
17 weather, eliminating the deferred revenue associated with the 2019 Fixed Cost Adjustment
18 (FCA) mechanism, and any material customer load or schedule changes. The rates used
19 exclude: 1) Purchase Gas Cost Adjustment Schedule 150, which reflects the costs related to
20 purchasing and transporting natural gas approved in the Company's last PGA filing, 2)
21 Temporary Gas Rate Adjustment Schedule 155, which reflects the approved amortization rate
22 for prior deferred natural gas costs approved in the Company's last PGA filing, 3) Fixed Cost

1 Adjustment Schedule 175, and 4) Demand Side Management Rate Adjustment Schedule 191.¹

2 **Q. Does the Revenue Normalization Adjustment contain a component**
3 **reflecting normalized natural gas costs?**

4 A. No, natural gas commodity costs have been removed from the Company's
5 filing.

6 **Q. Have you determined the impact of each of the components of this**
7 **adjustment?**

8 A. Yes. The net operating income impact for each of the components is as
9 follows:

- 10 1. Re-pricing of base distribution revenue, including Permanent Tax Reform rate
11 adjustment Schedule 172, increased net operating income by \$284,000.
 - 12 2. Re-pricing base distribution unbilled revenue increased net operating income
13 by \$400,000.
 - 14 3. The weather adjustment at present base rates decreased net operating come by
15 \$788,000.
 - 16 4. The elimination of the deferred decoupling revenue increased net operating
17 income by \$518,000.
- 18

19 The total net amount of the natural gas revenue normalization adjustment is an
20 increase to net operating income of \$414,000, as shown in adjustment column 2.07, on page
21 7 of Ms. Andrews Exhibit No. 5, Schedule 2.

22 **Q. Would you please briefly discuss natural gas weather normalization?**

23 A. Yes. The natural gas weather normalization adjustment is developed from a
24 regression analysis of ten years of billed usage per customer and billing period heating degree-
25 day data. The resulting seasonal weather sensitivity factors (use-per-customer-per-heating-

¹ Documentation related to this adjustment is detailed in my workpapers accompanying this case.

1 degree day) are applied to monthly test period customers, and the difference between normal
2 heating degree-days and monthly test period observed heating degree-days. This calculation
3 produces the change in therm usage required to adjust existing loads to the amount expected
4 if weather had been normal.

5 **Q. In the discussion of electric weather normalization sponsored by Ms.**
6 **Knox, she indicated that the adjustment utilized sensitivity factors from the 10-year**
7 **period January 2010 through December 2019. Is this true for natural gas as well?**

8 A. Yes, the natural gas weather adjustment utilized weather sensitivity factors for
9 the same 10-year period.

10 **Q. What data did you use to determine “normal” heating degree days?**

11 A. Normal heating degree-days are based on a rolling 30-year average of heating
12 degree-days reported for each month by the National Weather Service for the Spokane Airport
13 weather station. Each year the normal values are adjusted to capture the most recent year with
14 the oldest year dropping off, thereby reflecting the most recent information available at the
15 end of each calendar year. The calculation includes the 30-year period from 1990 through
16 2019.

17 **Q. Is this proposed weather adjustment methodology consistent with the**
18 **methodology utilized in the Company’s last general rate case in Idaho?**

19 A. Yes. The process for determining the weather sensitivity factors and the
20 monthly adjustment calculation is consistent with the methodology presented in Case No.
21 AVU-G-17-01.

22 **Q. What was the impact of natural gas weather normalization on the 12-**
23 **months ended December 2019 test year?**

1 operations presented by Ms. Andrews in Exhibit No. 5, Schedule 2.

2 **Q. Would you please explain the natural gas cost of service study presented**
3 **in Schedule 2?**

4 A. Yes. Exhibit No. 17, Schedule 2 is composed of a series of summaries of the
5 cost of service study results. Page 1 shows the results of the study by FERC account category.
6 The rate of return and the ratio of each schedule's return to the overall return are shown on
7 lines 38 and 39. This summary is provided to Company witness Mr. Miller for his
8 consideration regarding rate spread and rate design. The results will be presented later in my
9 testimony. Additional summaries show the costs organized by functional category (page 2)
10 and classification (page 3), including margin and unit cost analysis at current and proposed
11 rates. Finally, page 4 is a summary identifying specific customer-related costs embedded in
12 the study.

13 The Excel model used to calculate the natural gas cost of service and supporting
14 schedules has been included in its entirety both electronically and hard copy in the natural gas
15 workpapers accompanying this case.

16 **Q. Does the Natural Gas Base Case cost of service study utilize the same**
17 **methodology as the Company's last natural gas case in Idaho?**

18 A. Yes, the Base Case cost of service study was prepared using the same
19 methodology applied to the study presented in Docket No. AVU-G-17-01.

20 **Q. What are the key elements that define the cost of service methodology?**

21 A. Underground storage costs are allocated by normalized winter throughput.
22 Natural gas main investment has been segregated into large and small mains. Large usage
23 customers that take service from large mains do not receive an allocation of small mains.

1 System facilities that serve all customers are classified by the peak and average ratio that
2 reflects the system load factor, then allocated by coincident peak demand and throughput,
3 respectively. Meter installation and services investment is allocated by number of customers
4 weighted by the relative current cost of those items. General plant is allocated based on the
5 Company’s blended four-part factor allocator (four-factor). Administrative & general
6 expenses are segregated into labor-related, plant-related, revenue-related, and “other”. The
7 costs are then allocated by factors associated with labor, plant in service, or revenue,
8 respectively. The “other” A&G amounts are allocated based on the Company’s four-factor.
9 A detailed description of the methodology is included in Exhibit No. 17, Schedule 1.

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11

IV. RESULTS

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Q. What are the results of the Company’s natural gas cost of service study?

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A. The Base Case cost of service study presented in this filing we believe provides a fair representation of the costs to serve each customer group. The study indicates that the General Service Schedule 101 (serving most residential customers) is providing less than the overall rate of return (unity), and Large General, and Transportation service schedules (111/112 and 146) are providing more than unity. Table No. 1 shows the rate of return and the relative return ratio at present rates for each rate schedule:

19

Table No.1: Base Case Results

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<u>Customer Class</u>	<u>Rate of Return</u>	<u>Return Ratio</u>
General Service Schedule 101	6.59%	0.90
Large General Service Schedule 111/112	10.55%	1.45
Transportation Schedule 146	12.70%	1.74
Total Idaho Natural Gas System	7.29%	1.00

1 The summary results of this study were provided to Mr. Miller for consideration in the
2 development of the proposed rates.

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

4 A. Yes.