BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-17
DOCKET NO. UG-17

EXH. EMA-9
ELIZABETH M. ANDREWS
REPRESENTING AVISTA CORPORATION

## CALCULATION OF GENERAL REVENUE REQUIREMENT <br> WASHINGTON NATURAL GAS <br> TWELVE MONTHS ENDED DECEMBER 31, 2016

The following information provides the Company's "Rate Year Study" results for the period 5/1/2018 through $4 / 30 / 2021$. This Study is provided as additional support for the rate relief requested by the Company for the Three-Year Rate Plan beginning May 1, 2018 through April 30, 2021. See Exh. EMA-7 for the EOP Rate Base Study representing the Company's requested natural gas rate relief proposed in this case.

May 1, 2018

| Line |
| :---: |
| No. |$\square$|  |
| :--- |
|  |


| $(000 ' s$ of Dollars) |
| :---: |

1 Pro Forma Rate Base

2 Proposed Rate of Return
\$ 325,263

3 Net Operating Income Requirement
$\qquad$
\$25,013

4 Pro Forma Net Operating Income
\$ 19,498

5 Net Operating Income Deficiency
\$5,515

6 Conversion Factor 0.620645

7 Revenue Requirement

|  | $\$ 8,886$ |
| :--- | ---: |
| $\$$ | 92,192 |
|  | $\mathbf{9 . 6 4 \%}$ |

10
Total Present Billed Revenue
$\$ \quad 152,089$

11 Percentage Billed Revenue Increase
5.84\%

* Line 8 "Total General Business Revenues" includes special contract transportation revenues.

12
13

14
15

Total 05/01/2019 Revenue Increase
(Rate Year 2, per pg 9)
Percentage Billed Revenue Increase

Total 05/01/2020 Revenue Increase
(Rate Year 3, per pg 10)
Percentage Billed Revenue Increase


| $\$$ | $\mathbf{3 , 9 3 6}$ |
| :---: | :---: |
|  | $\mathbf{2 . 3 9 \%}$ |

## AVISTA UTILITIES

| Capital Structure |  |  |  |
| :--- | ---: | :--- | :--- |
| Component | Capital <br> Structure | Cost | Weighted <br> Cost |
|  |  |  |  |
| Total Debt | $51.5 \%$ | $5.62 \%$ | $2.89 \%$ |
| Common Equity | $48.5 \%$ | $9.90 \%$ | $4.80 \%$ |
| Total | $\underline{100.00 \%}$ |  | $工$ |

## AVISTA UTILITIES

## REVENUE CONVERSION FACTOR

WASHINGTON NATURAL GAS
TWELVE MONTHS ENDED DECEMBER 31, 2016

| $\begin{gathered} \text { Line } \\ \text { No. } \end{gathered}$ | Description | Factor |
| :---: | :---: | :---: |
| 1 | Revenues | 1.000000 |
| 2 | Expense: Uncollectibles | 0.004827 |
| 3 | Commission Fees | 0.002000 |
| 4 | Washington Excise Tax | 0.038334 |
| 6 | Total Expense | 0.045161 |
| 7 | Net Operating Income Before FIT | 0.954839 |
| 8 | Federal Income Tax @ 35\% | 0.334194 |
| 9 | REVENUE CONVERSION FACTOR | 0.620645 |

AVISTA UTILITIES
WASHINGTON NATURAL GAS $\mid$ ACTUAL RESTATEMENT ADJUSTMENTS
RATE YEAR STUDY - 5/1/2018-4/30/2021 RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2016
(000'S OF DOLLARS)

| Line <br> No. | DESCRIPTION |  | Deferred FIT <br> Rate Base | Deferred Debits and Credits |  | Working Capital | $\begin{gathered} \hline \text { Eliminate } \\ \text { B \& O } \\ \text { Taxes } \\ \hline \end{gathered}$ | $\begin{array}{\|c\|} \hline \text { Restate } \\ \text { Property } \\ \text { Tax } \\ \hline \end{array}$ | Uncollectible Expense | Regulatory Expense | $\begin{array}{\|c\|} \hline \text { Injuries } \\ \& \\ \text { Damages } \\ \hline \end{array}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Adjsutment Number | 1.00 | 1.01 | 1.02 |  | 1.03 | 2.01 | 2.02 | 2.03 | 2.04 | 2.05 | 2.06 |
|  | Workpaper Reference | G-ROO | G-DFIT | G-DDC |  | G-WC | G-EBO | G-RPT | G-UE | G-RE | G-ID | G-FIT |
|  | REVENUES |  |  |  |  |  |  |  |  |  |  |  |
| 1 | Total General Business | \$ 146,098 | \$ | \$ | - | \$ | \$ $(5,097)$ | \$ | \$ | \$ | \$ | \$ |
| 2 | Total Transportation | 4,595 | - |  | - | - | (118) | - | - | - | - | - |
| 3 | Other Revenues | 69,723 | - |  | - | - | - | - | - | - | - | - |
| 4 | Total Gas Revenues | 220,416 | - |  | - | - | $(5,215)$ | - | - | - | - | - |
|  | EXPENSES |  |  |  |  |  |  |  |  |  |  |  |
|  | Production Expenses |  |  |  |  |  |  |  |  |  |  |  |
| 5 | City Gate Purchases | 112,605 | - |  | - | - | - | - | - | - | - | - |
| 6 | Purchased Gas Expense | 988 | - |  | - | - | - | - | - | - | - | - |
| 7 | Net Nat Gas Storage Trans | 2,932 | - |  | - | - | - | - | - | - | - | - |
| 8 | Total Production | 116,525 | - |  | - | - | - | - | - | - | - | - |
|  | Underground Storage |  |  |  |  |  |  |  |  |  |  |  |
| 9 | Operating Expenses | 974 | - |  | - | - | - | - | - | - | - | - |
| 10 | Depreciation/Amortization | 492 | - |  | - | - | - | - | - | - | - | - |
| 11 | Taxes | 210 | - |  | - | - | - | - | - | - | - | - |
| 12 | Total Underground Storage | 1,676 | - |  | - | - | - | - | - | - | - | - |
|  | Distribution |  |  |  |  |  |  |  |  |  |  |  |
| 13 | Operating Expenses | 12,049 | - |  | - | - | - | - | - | - | - | - |
| 14 | Depreciation/Amortization | 9,866 | - |  | - | - | - | - | - | - | - | - |
| 15 | Taxes | 12,807 | - |  | - | - | $(5,183)$ | 375 | - | - | - | - |
| 16 | Total Distribution | 34,722 | - |  | - | - | $(5,183)$ | 375 | - | - | - | - |
| 17 | Customer Accounting | 7,352 | - |  | 2 | - | - |  | (590) | - | - | - |
| 18 | Customer Service \& Information | 7,595 | - |  | - | - | - | - | - | - | - | - |
| 19 | Sales Expenses | - | - |  | - | - | - | - | - | - | - | - |
|  | Administrative \& General |  |  |  |  |  |  |  |  |  |  |  |
| 20 | Operating Expenses | 13,763 | - |  | - | - | - | - | - | (3) | 76 | - |
| 21 | Depreciation/Amortization | 6,260 | - |  | - | - | - | - | - | - | - | - |
| 22 | Regulatory Amortizations | - |  |  |  |  |  |  |  |  |  |  |
| 23 | Taxes | - | - |  | - | - | - | - | - | - | - | - |
| 24 | Total Admin. \& General | 20,023 | - |  | - | - | - | - | - | (3) | 76 | - |
| 25 | Total Gas Expense | 187,893 | - |  | 2 | $-$ | $(5,183)$ | 375 | (590) | (3) | 76 | - |
| 26 | OPERATING INCOME BEFORE FIT | 32,523 | - |  | (2) | - | (32) | (375) | 590 | 3 | (76) | - |
|  | FEDERAL INCOME TAX |  |  |  |  |  |  |  |  |  |  |  |
| 27 | Current Accrual | (841) | - |  | (1) | - | (11) | (131) | 207 | 1 | (27) | - |
| 28 | Debt Interest | - | 3 |  | - | 9 | - | - | - | - | - |  |
| 29 | Deferred FIT | 9,923 | - |  | - | - | - | - | - | - | - | - |
| 30 | Amort ITC | (17) |  |  |  |  | - | - | - | - | - | - |
| 31 | NET OPERATING INCOME | \$ 23,458 | \$ (3) | \$ (1) | (1) | \$ (9) | \$ (21) | \$ (244) | \$ 384 | \$ 2 | \$ (49) | \$ |

## RATE BASE

PLANT IN SERVICE
Underground Storage
Distribution Plant
General Plant
Total Plant in Service
ACCUMULATED DEPRECIATION/AMORT
Underground Storage
Distribution Plant
General Plant
Total Accumulated Depreciation/Amortization
NET PLANT
DEFERRED TAXES
Net Plant After DFIT
GAS INVENTORY
GAIN ON SALE OF BUILDING
OTHER
WORKING CAPITAL

## TOTAL RATE BASE

RATE OF RETURN
REVENUE REQUIREMENT
Pro Forma Rate of Return
Revenue Conversion Factor

| \$ 26,868 | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 390,508 |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| 82,624 |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| 500,000 |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |
| $(10,317)$ |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| $(129,098)$ |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| $(23,473)$ |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| $(162,888)$ |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| 337,112 |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| $(73,856)$ |  | (325) |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |
| 263,256 |  | (325) |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| 9,116 |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  |  |
| - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |
|  |  |  |  | - |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  |  | - |  | - |  | (864) |  | - |  | - |  | - |  | - |  | - |  | - |
| \$ 287,787 | \$ | (325) | \$ | - | \$ | (864) | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - |
| 8.15\% |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| -2,138 |  | -35 |  | 2 |  | -93 |  | 34 |  | 393 |  | -618 |  | -3 |  | 80 |  | 0 |
| 7.69\% |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| 0.620645 |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |

AVISTA UTILITIES
WASHINGTON NATURAL GAS
RATE YEAR STUDY - 5/1/2018-4/30/2021
TWELVE MONTHS ENDED DECEMBER 31, 2016
(000'S OF DOLLARS)

| Line <br> No. | DESCRIPTION | Office Space Charges to Subs | Restate <br> Excise <br> Taxes | Net Gains \& Losses | Weather Normalization / Gas Cost Adjust | Eliminate <br> Adder <br> Schedules | Misc. Restating <br> Non-Util / Non- <br> Recurring Expense. | Project Compass Deferral | Restating Incentives | Restate Debt <br> Interest | Restated TOTAL |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Adjsutment Number | 2.07 | 2.08 | 2.09 | 2.10 | 2.11 | 2.12 | 2.13 | 2.14 | 2.15 |  |
|  | Workpaper Reference | G-OSC | G-RET | G-NGL | G-WNGC | G-EAS | G-MR | G-CD | G-RI | G-DI | R-Ttl |
|  | REVENUES |  |  |  |  |  |  |  |  |  |  |
| 1 | Total General Business | \$ | \$ | \$ | \$ 11,209 | \$ (1,240) | \$ | \$ | \$ | \$ | \$ 150,970 |
| 2 | Total Transportation | - | - | - |  | - | - | - | - | - | 4,477 |
| 3 | Other Revenues | - | - | - | $(5,427)$ | $(63,276)$ | - | - | - | - | 1,020 |
| 4 | Total Gas Revenues | - | - | - | 5,782 | $(64,516)$ | - | - | - | - | 156,467 |
|  | EXPENSES |  |  |  |  |  |  |  |  |  |  |
|  | Production Expenses |  |  |  |  |  |  |  |  |  |  |
| 5 | City Gate Purchases | - | - | - | 5,274 | $(54,419)$ | - | - | - | - | 63,460 |
| 6 | Purchased Gas Expense | - | - | - | 6 | - | - | - | - | - | 994 |
| 7 | Net Nat Gas Storage Trans | - | - | - | - | $(2,932)$ | - | - | - | - | - |
| 8 | Total Production | - | - | - | 5,280 | $(57,351)$ | - | - | - | - | 64,454 |
|  | Underground Storage |  |  |  |  |  |  |  |  |  |  |
| 9 | Operating Expenses | - | - | - | - | - | - | - | - | - | 974 |
| 10 | Depreciation/Amortization | - | - | - | - | - | - | - | - | - | 492 |
| 11 | Taxes | - | - | - | - | - | - | - | - | - | 210 |
| 12 | Total Underground Storage | - | - | - | - | - | - | - | - | - | 1,676 |
|  | Distribution |  |  |  |  |  |  |  |  |  |  |
| 13 | Operating Expenses | - | - | - | - | - | 1 | - | - | - | 12,050 |
| 14 | Depreciation/Amortization | - | - | (13) | - | - | - | - | - | - | 9,853 |
| 15 | Taxes | - | 2 | - | 430 | (48) | - | - | - | - | 8,383 |
| 16 | Total Distribution | - | 2 | (13) | 430 | (48) | 1 | - | - | - | 30,286 |
| 17 | Customer Accounting | - | - | - | 54 | (6) | - | - | - | - | 6,812 |
| 18 | Customer Service \& Information | - | - | - | - | $(6,632)$ | - | - | - | - | 963 |
| 19 | Sales Expenses | - | - | - | - | - | - | - | - | - | - |
|  | Administrative \& General |  |  |  |  |  |  |  |  |  | - |
| 20 | Operating Expenses | (9) | - | - | 22 | (2) | (316) | - | (181) | - | 13,350 |
| 21 | Depreciation/Amortization | - | - | - |  |  | - | - | - | - | 6,260 |
| 22 | Regulatory Amortizations |  |  |  | - | - | - | 1,079 | - | - | 1,079 |
| 23 | Taxes | - | - | - | - | - | - | - | - | - | - |
| 24 | Total Admin. \& General | (9) | - | - | 22 | (2) | (316) | 1,079 | (181) | - | 20,689 |
| 25 | Total Gas Expense | (9) | 2 | (13) | 5,786 | $(64,039)$ | (315) | 1,079 | (181) | - | 124,880 |
| 26 | OPERATING INCOME BEFORE FIT | 9 | (2) | 13 | (4) | (477) | 315 | $(1,079)$ | 181 | - | 31,587 |
|  | FEDERAL INCOME TAX |  |  |  |  |  |  |  |  |  |  |
| 27 | Current Accrual | 3 | (1) | 5 | (1) | (167) | 110 | (378) | 63 | (171) | $(1,340)$ |
| 28 | Debt Interest | - | - | - | - | - | - | - | - |  | 12 |
| 29 | Deferred FIT | - | - | - | - | - | - | - | - | - | 9,923 |
| 30 | Amort ITC | - | - | - | - | - | - | - | - | - | (17) |
| 31 | NET OPERATING INCOME | \$ 6 | \$ (1) | 8 | \$ (3) | \$ (310) | \$ 205 | \$ (701) | \$ 118 | \$ 171 | \$ 23,009 |

RATE BASE
PLANT IN SERVICE
Underground Storage
Distribution Plant
General Plant
Total Plant in Service
ACCUMULATED DEPRECIATION/AMORT
Underground Storage
Distribution Plant
General Plant
Total Accumulated Depreciation/Amortization
NET PLANT
DEFERRED TAXES
Net Plant After DFIT
GAS INVENTORY
GAIN ON SALE OF BUILDING
OTHER
WORKING CAPITAL
TOTAL RATE BASE
RATE OF RETURN
REVENUE REQUIREMENT
Pro Forma Rate of Return
Revenue Conversion Factor

| \$ | 6 | \$ | (1) | \$ | 8 | \$ | (3) | \$ | (310) | \$ | 205 | \$ | (701) | \$ | 118 | \$ | 171 | \$ 23,009 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ 26,868 |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | 390,508 |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | 82,624 |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | 500,000 |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | $(10,317)$ |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | $(129,098)$ |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | $(23,473)$ |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | $(162,888)$ |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | 337,112 |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | $(74,181)$ |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | 262,931 |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | 9,116 |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | - |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | (249) |
|  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - |  | - | 14,800 |
| \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ | - | \$ 286,598 |
|  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  | (1) |
|  | -9 |  | 2 |  | -14 |  | 4 |  | 500 |  | -330 |  | 1,130 |  | -190 |  | -276 | -1,562 |

(1) The Restated TOTAL column does not represent 12/31/2016 Test Period Commission Basis results of operation on a normalized basis (CBR basis). Difference exists due to inclusion of proposed cost of debt (pro forma versus CBR cost of debt) impacting Adjustment 2.15 above.

AVISTA UTILITIES
WASHINGTON NATURAL GAS
RATE YEAR STUDY - 5/1/2018-4/30/2021
TWELVE MONTHS ENDED DECEMBER 31, 2016
(000'S OF DOLLARS)

RATE BASE
PLANT IN SERVICE
Underground Storage
Distribution Plant
General Plant
Total Plant in Service
ACCUMULATED DEPRECIATION/AMORT
Underground Storage
Distribution Plant
General Plant
Total Accumulated Depreciation/Amortization
NET PLANT
DEFERRED TAXES
Net Plant After DFIT
GAS INVENTORY
GAIN ON SALE OF BUILDING
OTHER
WORKING CAPITAL

## TOTAL RATE BASE

RATE OF RETURN
REVENUE REQUIREMENT
Pro Forma Rate of Return
Revenue Conversion Factor

| Line <br> No. | DESCRIPTION | Pro Forma Atmospheric Testing \& Leak Survey | Pro Forma Labor Non-Exec | Pro Forma Labor Exec | Pro Forma Employee Benefits | $\begin{gathered} \hline \text { Pro Forma } \\ \text { Incentive } \\ \text { Adjustment } \\ \hline \end{gathered}$ | Pro Forma Property Tax | Pro Forma IS/IT Expense | Pro Forma Revenue Normalization |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Adjsutment Number | 3.01 | 3.02 | 3.03 | 3.04 | 3.05 | 3.06 | 3.07 | 3.08 |
|  | Workpaper Reference | G-PAT | G-PLN | G-PLE | G-PEB | G-PI | G-PPT | G-PIS | G-PREV |
|  | REVENUES |  |  |  |  |  |  |  |  |
| 1 | Total General Business | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ (66,671) |
| 2 | Total Transportation | - | - | - | - | - | - | - | 56 |
| 3 | Other Revenues | - | - | - | - | - | - | - | (776) |
| 4 | Total Gas Revenues | - | - | - | - | - | - | - | $(67,391)$ |
|  | EXPENSES |  |  |  |  |  |  |  |  |
|  | Production Expenses |  |  |  |  |  |  |  |  |
| 5 | City Gate Purchases | - | - | - | - | - | - | - | $(63,460)$ |
| 6 | Purchased Gas Expense | - | 31 | - | (6) | - | - | - | - |
| 7 | Net Nat Gas Storage Trans | - | - | - | - | - | - | - | - |
| 8 | Total Production | - | 31 | - | (6) | - | - | - | $(63,460)$ |
|  | Underground Storage |  |  |  |  |  |  |  |  |
| 9 | Operating Expenses | - | - | - | - | - | - | - | - |
| 10 | Depreciation/Amortization | - | - | - | - | - | - | - | - |
| 11 | Taxes | - | - | - | - | - | 37 | - | - |
| 12 | Total Underground Storage | - | - | - | - | - | 37 | - | - |
|  | Distribution |  |  |  |  |  |  |  |  |
| 13 | Operating Expenses | 348 | 371 |  | (76) | - | - | - | - |
| 14 | Depreciation/Amortization | - | - | - | - | - | - | - | - |
| 15 | Taxes | - | - | - | - | - | 439 | - | $(2,554)$ |
| 16 | Total Distribution | 348 | 371 | - | (76) | - | 439 | - | $(2,554)$ |
| 17 | Customer Accounting | - | 203 | - | (41) | - |  |  | (322) |
| 18 | Customer Service \& Information | - | 18 | - | (4) | - | - | - | - |
| 19 | Sales Expenses | - | - | - | - | - | - | - | - |
|  | Administrative \& General |  |  |  |  |  |  |  |  |
| 20 | Operating Expenses | - | 251 | (10) | (49) | 34 | - | 201 | (133) |
| 21 | Depreciation/Amortization | - | - | - | - |  | - | - | - |
| 22 | Regulatory Amortizations |  |  |  |  | - |  |  | - |
| 23 | Taxes | - | - | - | - | - | - | - | - |
| 24 | Total Admin. \& General | - | 251 | (10) | (49) | 34 | - | 201 | (133) |
| 25 | Total Gas Expense | 348 | 874 | (10) | (176) | 34 | 476 | 201 | $(66,469)$ |
| 26 | OPERATING INCOME BEFORE FIT | (348) | (874) | 10 | 176 | (34) | (476) | (201) | (922) |
|  | FEDERAL INCOME TAX |  |  |  |  |  |  |  |  |
| 27 | Current Accrual | (122) | (306) | 4 | 62 | (12) | (167) | (70) | (323) |
| 28 | Debt Interest | - | - | - | - | - | - | - | - |
| 29 | Deferred FIT | - | - | - | - | - | - | - | - |
| 30 | Amort ITC | - | - | - | - | - | - | - | - |
| 31 | NET OPERATING INCOME | \$ (226) | \$ (568) | \$ 7 | \$ 114 | \$ (22) | \$ (309) | \$ (131) | \$ (599) |

PRO FORMA ADJUSTMENTS

| $\$$ | - |  |  |  |  |  |  |  |  |
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(Natural Gas)
AVISTA UTILITIES
WASHINGTON NATURAL GAS
RATE YEAR STUDY - 5/1/2018-4/30/2021
TWELVE MONTHS ENDED DECEMBER 31, 2016
(000'S OF DOLLARS)


Pro Forma Rate of Return
Revenue Conversion Factor

Step 1 Increase ( $\mathbf{5 / 1 / 2 0 1 8 )}$
WASHINGTON NATURAL GAS
RATE YEAR STUDY - 5/1/2018-4/30/2021
TWELVE MONTHS ENDED DECEMBER 31, 2016
(000'S OF DOLLARS)

| $\begin{aligned} & \text { Line } \\ & \text { No. } \end{aligned}$ | DESCRIPTION | EOP 2017 Capital Net Plant Adj | $\begin{array}{\|c\|} \hline \begin{array}{l} \text { Rate Period } \\ \text { Capital Add } \end{array} \\ \text { 05.2018-04.2019 AMA } \end{array}$ | Rate Period <br> IS/IT <br> Expense | $\begin{array}{c\|} \hline \text { Rate Period } \\ \text { Revenues } \\ 05.2018-04.2019 \end{array}$ | May 1, 2018 Rate Period Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Adjsutment Number | 18.01 | 18.02 | 18.03 | 18.04 | 18-Ttl |
|  | Workpaper Reference | G-EOPCAP17 | G-RPCAP | G-RPIS | G-RPRev |  |
|  | REVENUES |  |  |  |  |  |
| 1 | Total General Business | \$ | \$ - | \$ - | 3,390 | \$ 87,689 |
| 2 | Total Transportation | - | - | - | (29) | 4,504 |
| 3 | Other Revenues | - | - | - | $(1,584)$ | $(1,340)$ |
| 4 | Total Gas Revenues | - | - | - | 1,777 | $\mathbf{9 0 , 8 5 3}$ |
|  | EXPENSES |  |  |  |  |  |
|  | Production Expenses |  |  |  |  |  |
| 5 | City Gate Purchases | - | - | - | - | - |
| 6 | Purchased Gas Expense | - | - | - | - | 1,019 |
| 7 | Net Nat Gas Storage Trans | - | - | - | - | - |
| 8 | Total Production | - | - | - | - | 1,019 |
|  | Underground Storage |  |  |  |  |  |
| 9 | Operating Expenses | - | - | - | - | 974 |
| 10 | Depreciation/Amortization | 37 | 14 | - | - | 543 |
| 11 | Taxes | - | - | - | - | 247 |
| 12 | Total Underground Storage | 37 | 14 | - | - | 1,764 |
|  | Distribution |  |  |  |  |  |
| 13 | Operating Expenses | - | - | - | - | 12,693 |
| 14 | Depreciation/Amortization | 725 | 482 | - | - | 11,426 |
| 15 | Taxes | - | - | - | 129 | 6,397 |
| 16 | Total Distribution | 725 | 482 | - | 129 | 30,516 |
| 17 | Customer Accounting | - | - |  | 16 | 6,668 |
| 18 | Customer Service \& Information | - | - | - | - | 977 |
| 19 | Sales Expenses | - | - | - | - | - |
|  | Administrative \& General |  |  |  |  |  |
| 20 | Operating Expenses | - | - | 135 | 7 | 13,862 |
| 21 | Depreciation/Amortization | 926 | 1,476 | - | - | 9,879 |
| 22 | Regulatory Amortizations |  |  |  |  | 584 |
| 23 | Taxes | - | - | - | - | - |
| 24 | Total Admin. \& General | 926 | 1,476 | 135 | 7 | 24,325 |
| 25 | Total Gas Expense | 1,688 | 1,972 | 135 | 152 | 65,269 |
| 26 | OPERATING INCOME BEFORE FIT | $(1,688)$ | $(1,972)$ | (135) | 1,625 | 25,584 |
|  | FEDERAL INCOME TAX |  |  |  |  |  |
| 27 | Current Accrual | (591) | (690) | (47) | 569 | $(3,441)$ |
| 28 | Debt Interest | (138) | (58) | - | - | (379) |
| 29 | Deferred FIT | - | - | - | - | 9,923 |
| 30 | Amort ITC | - | - | - | - | (17) |
| 31 | NET OPERATING INCOME | \$ (959) | $(1,224)$ | (88) | \$ 1,056 | \$ 19,498 |
|  | RATE BASE |  |  |  |  |  |
|  | PLANT IN SERVICE |  |  |  |  |  |
| 32 | Underground Storage | \$ 1,349 | \$ 811 | \$ | \$ | \$ 29,028 |
| 33 | Distribution Plant | 29,936 | 19,165 | - | - | 454,119 |
| 34 | General Plant | 7,229 | 7,681 | $\cdot$ | - | 105,794 |
| 35 | Total Plant in Service | 38,514 | 27,657 | - | - | 588,941 |
|  | ACCUMULATED DEPRECIATION/AMORT |  |  |  |  |  |
| 36 | Underground Storage | (655) | (518) | - | - | $(11,490)$ |
| 37 | Distribution Plant | $(12,080)$ | $(9,541)$ | - | - | $(150,882)$ |
| 38 | General Plant | $(4,979)$ | $(7,078)$ | - | - | $(36,154)$ |
| 39 | Total Accumulated Depreciation/Amortization | $(17,714)$ | $(17,137)$ | - | - | $(198,526)$ |
| 40 | NET PLANT | 20,800 | 10,520 | - | - | 390,415 |
| 41 | DEFERRED TAXES | $(7,174)$ | $(4,796)$ | - | - | $(90,293)$ |
| 42 | Net Plant After DFIT | 13,626 | 5,724 | - | - | 300,122 |
| 43 | GAS INVENTORY | - |  | - | - | 9,116 |
| 44 | GAIN ON SALE OF BUILDING |  |  | - | - | - |
| 45 | OTHER |  |  |  |  | 1,225 |
| 46 | WORKING CAPITAL |  |  | - | - | 14,800 |
| 47 | TOTAL RATE BASE | \$ 13,626 | \$ 5,724 | \$ | \$ | \$ 325,263 |
| 48 | RATE OF RETURN |  |  |  |  |  |
| 50 | REVENUE REQUIREMENT | 3,234 | 2,681 | 141 | -1,702 | 8,886 |

Pro Forma Rate of Return
Revenue Conversion Factor
(Natural Gas)
AVISTA UTILITIES
Step 2 Increase (5/1/2019)
WASHINGTON NATURAL GAS
RATE YEAR STUDY - 5/1/2018-4/30/2021
TWELVE MONTHS ENDED DECEMBER 31, 2016
(000'S OF DOLLARS)

| $\begin{array}{c}\text { Line } \\ \text { No. }\end{array}$ |  |  |
| ---: | :--- | :---: |
| Adjsutment Number |  |  |
|  | Workpaper Reference |  |
|  | REVENUES |  |
| 1 | Total General Business |  |
| 2 | Total Transportation |  |
| 3 | Other Revenues |  |

Other Revenues
Total Gas Revenues
EXPENSES
Production Expenses
City Gate Purchases
Purchased Gas Expense
Net Nat Gas Storage Trans
Total Production
Underground Storage
Operating Expenses
Depreciation/Amortization
Taxes
Total Underground Storage
Distribution
Operating Expenses
Depreciation/Amortization
Taxes
Total Distribution

Customer Accounting
Customer Service \& Information
Sales Expenses

Administrative \& General
Operating Expenses
Depreciation/Amortization
Regulatory Amortizations
Taxes
Total Admin. \& General
Total Gas Expense
OPERATING INCOME BEFORE FIT
FEDERAL INCOME TAX
Current Accrual
Debt Interest
Deferred FIT
Amort ITC
NET OPERATING INCOME
RATE BASE
PLANT IN SERVICE
Underground Storage
Distribution Plant
General Plant
Total Plant in Service
ACCUMULATED DEPRECIATION/AMORT
Underground Storage
Distribution Plant
General Plant
Total Accumulated Depreciation/Amortization
NET PLANT
DEFERRED TAXES
Net Plant After DFIT
GAS INVENTORY
GAIN ON SALE OF BUILDING
OTHER
WORKING CAPITAL
TOTAL RATE BASE
RATE OF RETURN
REVENUE REQUIREMENT

Pro Forma Rate of Return
Revenue Conversion Factor
05.2019 Rate Year Analysis
(5/1/2019-4/30/2020)

| May 1, 2018 <br> FINAL <br> Rate Period Total | 2.71\% |  |  |  | May 1, 2019 <br> FINAL <br> Rate Period <br> Total | Incremental <br> May 1, 2019 (I) <br> Rate Period <br> Total |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Rate Period <br> Capital (AMA) <br> $\mathbf{0 5 . 2 0 1 9 - 0 4 . 2 0 2 0}$ | $\begin{array}{\|c} \hline \text { Rate Period } \\ \text { O\&M/A\&G } \\ 2.71 \% \end{array}$ | $\begin{array}{\|c\|} \hline \text { Rate Period } \\ \text { Property Tax } \\ \text { Expense } \end{array}$ | $\begin{gathered} \hline \text { Rate Period } \\ \text { Revenues } \\ 05.2019-04.2020 \end{gathered}$ |  |  |
| 18-Ttl | $\begin{gathered} 19.01 \\ \text { G-CAP19 } \end{gathered}$ | $\begin{gathered} 19.02 \\ \text { G-LN19 } \end{gathered}$ | $\begin{gathered} \hline 19.03 \\ \text { G-PT19 } \end{gathered}$ | $\begin{gathered} 19.04 \\ \text { G-Rev19 } \end{gathered}$ | 19-Ttl | 19-Ttl |
| $\begin{array}{lr} \$ & 87,689 \\ & 4,504 \\ & (1,340) \\ \hline \end{array}$ | \$ | \$ | \$ | $\begin{array}{lr} \$ & 1,147 \\ & 69 \\ & (69) \\ \hline \end{array}$ | $\begin{array}{cr} \$ 88,836 \\ & 4,573 \\ & (1,409) \\ \hline \end{array}$ | $\begin{array}{rr} \$ & 1,147 \\ & 69 \\ & (69) \\ \hline \end{array}$ |
| $\mathbf{9 0 , 8 5 3}$ | - | - | - | 1,147 | 92,000 | 1,147 |


| $\mathbf{9 0 , 8 5 3}$ | - | - | - | 1,147 | 92,000 | 1,147 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| - | - | - | - | - | - | - |
| 1,019 | - | 28 | - | - | 1,047 | 28 |
| - | - | - | - | - | - | - |
| 1,019 | - | 28 | - | - | 1,047 | 28 |
| 974 | - | 26 | - | - | 1,000 | 26 |
| 543 | 15 | - | - | - | 558 | 15 |
| 247 | - | - | 18 | - | 265 | 18 |
| 1,764 | 15 | 26 | 18 | - | 1,823 | 59 |

(Natural Gas)
AVISTA UTILITIES
Step 3 Increase ( $\mathbf{5} / \mathbf{1 / 2 0 2 0}$ )
WASHINGTON NATURAL GAS
RATE YEAR STUDY - 5/1/2018-4/30/2021
TWELVE MONTHS ENDED DECEMBER 31, 2016
(000'S OF DOLLARS)
05.2020 Rate Year Analysis 5/1/2020-4/30/2021)


Pro Forma Rate of Return
Revenue Conversion Factor

## Exh. EMA-9 - Natural Gas Rate Year Study

## Q. Please explain the purpose of the natural gas Rate Year Study.

A. The Rate Year Study was developed to show the planned investment, and operating expenses, offset by revenues from increased sales to customers through each rate year of the Three-Year Rate Plan, May 1, 2018 through April 30, 2021. This Study is provided as additional evidence demonstrating the need for revenue increases for the threeyear rate period. This information is the same information presented to Avista's Board of Directors and Rating Agencies, and reflects the planned operations for Avista for the specific rate year. Therefore, the results of the Rate Year Study reflect the revenue increases actually needed by Avista during the three-year period in order for revenue to be sufficient during the rate year to cover Avista's costs, and have a reasonable opportunity to earn the allowed return on investment.

The results of the natural gas Rate Year Study are $\$ 8.9$ million for Rate Year 1, effective May 1, 2018; $\$ 3.5$ million for Rate Year 2, effective May 1, 2019; and \$3.9 million for Rate Year 3, effective May 1, 2020.

## Q. Please explain what is shown on pages 1 - 3 of Exh. EMA-9.

A. Page 1 of Exh. EMA-9 shows, at line 7, the calculation of the natural gas Rate Year 1 revenue requirement of $\$ 8,886,000$, or $9.64 \%$ revenue increase, as shown on line 9. This page also shows the effect on billed rates of $5.84 \%$.

Also shown on page 1, at lines 12-15, are the incremental rate adjustments, per the Rate Year Study, for Rate Year 2 (effective May 1, 2019) and Rate Year 3 (May 1, 2020). As shown on lines 12 and 13 , the incremental revenue requirement for Rate Year 2 is
$\$ 3,461,000$, or $2.15 \%$ on a billed basis. Lines 14 and 15 show the incremental revenue requirement for Rate Year 3 is $\$ 3,936,000$, or $2.39 \%$ on a billed basis.

Page 2 of Exh. EMA-9, shows the Cost of Capital and Capital Structure included in the Rate Year Study, including: 1) $48.5 \%$ Common Equity / 51.5\% Debt capital structure; 2) Return on Equity of $9.9 \%$; and 3) cost of debt of $5.62 \%$, resulting in an overall Rate of Return (weighted average cost of capital) of $7.69 \%$. Company witness Mr. Thies discusses the Company's rate of return and the capital structure, while Company witness Mr. McKenzie provides additional testimony related to the appropriate return on equity for Avista.

Page 3 shows the derivation of the natural gas net-operating-income-to-grossrevenue conversion factor. The conversion factor takes into account uncollectible accounts receivable, Commission fees and Washington State excise taxes. Federal income taxes are reflected at $35 \%$.
Q. Now turning to pages pages 4 through 7 of Exh. EMA-9, please explain what is included on those pages?
A. Page 4 begins with actual operating results and rate base for the twelve-months-ending December 31, 2016 test period on an AMA basis in column (1.00). Individual normalizing and restating adjustments that are standard components of our annual reporting to the Commission begin in column (1.01) on page 4 and continue through column (2.15) on page 5. Individual Pro Forma adjustments are shown on pages 6 and 7 in columns (3.01) though (3.13). The last column on page 7, labeled "Pro Forma SubTotal" is the subtotal of the previous columns (1.00) through (3.13), and produces the

Traditional Pro Forma Study net operating income (NOI), total rate base, and revenue requirement totaling $\$ 4,531,000$, as seen in Exh. EMA-6.

Provided with Exh. EMA-6 are explanations of each of the natural gas Commission Basis, restating and Pro Forma adjustments included on pages 4 through 7. The Company has also provided workpapers, both in hard copy and electronic formats, which include additional details related to each of these adjustments.

## Q. Now turning to pages pages 8 through 10 of Exh. EMA-9, please explain

 what is included on those pages?A. Page 8 of Exh. EMA-9 includes additional Rate Year 1 (May 1, 2018 - April 30, 2019) adjustments necessary beyond that included in the Traditional Pro Forma Study. These adjustments represent Rate Year 1 adjustments that do not meet the Commissions traditional pro forma methodology for inclusion in the Traditional Pro Forma Study; but none-the-less, are planned costs during the Rate Year 1 period. These individual Rate Year adjustments include columns (18.01) through (18.04). A summary column on page 8 , labeled "May 1, 2018 Rate Period Total" sums the Traditional Pro Forma Total column and these four adjustments reflecting the overall revenue requirement needed per Rate Year 1 of $\$ 8,886,000$.

Turning to page 9, this page starts with the "May 1, 2018 Rate Period Total." Four Rate Year 2 adjustments, (19.01) through (19.04) for the period May 1, 2019 - April 30, 2020, are included here to reflect planned capital additions and expenses, offset by revenues from increased sales to customers for Rate Year 2, effective May 1, 2019. The impact of including these Rate Year 2 adjustments, result in a total revenue requirement as of May 1,

2019 of $\$ 12,347,000$ as shown in column "May 1, 2019 Rate Period Total." This reflects an incremental revenue requirement amount of \$3,461,000 above the May 1, 2018 level.

Turning to Page 10, this page starts with the "May 1, 2019 Rate Period Total." Four Rate Year 3 adjustments, (20.01) through (20.04) for the period May 1, 2020 - April 30, 2021, are included here to reflect planned capital additions and expenses, offset by revenues from increased sales to customers for Rate Year 3, effective May 1, 2020. The impact of including these Rate Year 3 adjustments, result in a total revenue requirement as of May 1, 2020 of $\$ 16,282,000$. This reflects an incremental revenue requirement amount of \$3,936,000 above the May 1, 2019 level.

Below is an explanation of each of the Rate Year Study adjustments mentioned above. The Company has also provided workpapers, both in hard copy and electronic formats, which include additional details related to each of these adjustments.

## Rate Year 1 (May 1, 2018 - April 30, 2019) Adjustments

Q. Please explain each of the Rate Year 1 adjustments included on page 8 of Exh. EMA-9.
A. Page 8 of Exh. EMA-9 includes the following adjustments:

EOP 2017 Capital Net Rate Base Additions, column (18.01), adjustment starts with the Traditional Pro Forma Study net plant after ADFIT results and adjusts total net plant after ADFIT, including all 2017 remaining capital additions, to a 2017 EOP basis. Specifically, Avista reviewed the planned capital projects that were below the 0.5 percent threshold for 2017 (i.e., those not included in the Traditional Pro Forma Study adjustment 3.10 Pro Forma 2017 "Threshold Capital Additions" discussed in Exh. EMA-6). These
additions were included for 2017, together with the associated A/D and ADFIT on a 2017 EOP basis, as well as annual depreciation expense. ${ }^{1}$ The associated ADFIT includes the repairs deduction and bonus tax depreciation expected through 2017 on an EOP basis ${ }^{2}$. In addition, the plant-in-service for 2016 AMA was adjusted to a 2017 EOP basis. The effect of this adjustment increases rate base by $\$ 13,626,000$ and decreases net operating income by $\$ 959,000$. Company witness Ms. Schuh sponsors this adjustment.

Rate Period Capital Additions (AMA) 05.2018-04.2019, column (18.02), this adjustment includes planned capital additions for the period January 1, 2018 through April 30, 2019, together with the associated A/D and ADFIT for the period 12-months ended April 30, 2019 on an average-of-monthly-average (AMA) basis. Annual depreciation for these capital additions are also included in this adjustment. The associated ADFIT includes repairs and bonus tax depreciation expected through April 2019 on an AMA basis. In addition, total plant-in-service as of EOP 2017 was adjusted to a 04.2019 AMA basis. The effect of this adjustment increases rate base by $\$ 5,724,000$ and decreases net operating income by $\$ 1,224,000$. Ms. Schuh sponsors this adjustment.

Rate Period IS/IT Expense, column (18.03), adjusts the level of information services and information technology (IS/IT) expense included in the Traditional Pro Forma Study in Pro Forma IS/IT adjustment (3.07), which included the level of IS/IT expenses that would be known as of May 1, 2018. This adjustment includes the incremental IS/IT

[^0]expenses planned during the period May 1, 2018 through April 30, 2019. This adjustment includes the incremental costs associated with software development, application licenses, maintenance fees, and technical support for a range of information services programs. These incremental expenditures are necessary to support Company cyber and general security, emergency operations readiness, electric and natural gas facilities and operations support, and customer services. Company witness Mr. Kensok sponsors this adjustment and provides more information within his testimony. The effect of this adjustment decreases net operating income by $\$ 88,000$.

Rate Period Revenues 05.2018-04.2019, column (18.04), reflects the incremental revenue at present rates from loads and customers included in the Company's forecast for the period 12-months ended April 30, 2019 compared to the test year Pro Forma Normalized Revenue. The adjustment includes estimated deferred revenues associated with the Decoupling Mechanism assuming the decoupling base is updated by Pro Forma Normalized Revenue at present rates. Company witness Ms. Knox sponsors this adjustment. The effect of this adjustment increases Washington net operating income by \$1,056,000.

## Rate Year 2 (May 1, 2019 - April 30, 2020) Adjustments

Q. Please explain each of the Rate Year 2 adjustments included on page 9 of Exh. EMA-9.
A. Page 9 of Exh. EMA-9 includes the following adjustments:

Rate Period Capital Additions (AMA) 05.2019-04.2020, column (19.01), this adjustment includes planned capital additions for the period May 1, 2019 through April 30,

2020, together with the associated A/D and ADFIT for the period 12-months ended April 30, 2020 on an AMA basis. Annual depreciation for these capital additions is also included in this adjustment. The associated ADFIT includes the repairs deduction and bonus tax depreciation expected through April 2020 on an AMA basis. In addition, total plant-inservice as of AMA 04.2019 was adjusted to a 04.2020 AMA basis. The effect of this adjustment increases rate base by $\$ 15,004,000$ and decreases net operating income by $\$ 916,000$. Ms. Schuh sponsors this adjustment.

Rate Period O\&M/A\&G (2.71\%) Expense, column (19.02), reflects the annual planned increase in operating expenses of $2.71 \%$, including $\mathrm{O} \& \mathrm{M}$, customer service, and administrative and general expenses. Per the Company's current financial forecast, the annual percentage increase in O\&M has been reduced to reflect "efficiency reductions" in $\mathrm{O} \& \mathrm{M}$, resulting in an $\mathrm{O} \& \mathrm{M}$ average increase of $2.71 \%$ on a system basis over the fouryear period 2017 to 2020 for the combined electric and natural gas systems. This $2.71 \%$ growth in operating expenses is a significant reduction from the prior year's average growth in $\mathrm{O} \& \mathrm{M}$ expenses, and reflects an effort by the Company to reduce its $\mathrm{O} \& \mathrm{M}$ expenses from previous years. The effect of this adjustment decreases Washington net operating income by $\$ 638,000$.

Rate Period Property Tax Expense, column (19.03), restates the Rate Year 1 level of property tax expense (beginning May 1, 2018) included in adjustment (3.06) Pro Forma Property tax, to the level of property tax expense the Company will experience during Rate Year 2 beginning May 1,2019. The property on which the tax is calculated is the property value as of December 31, 2018. The effect of this adjustment decreases net operating income by $\$ 150,000$.

Rate Period Revenues 05.2019-04.2020, column (19.04), reflects the incremental revenue at present rates from loads and customers included in the Company's forecast for the period 12-months ended April 30, 2020 compared to the Rate Period Revenues 05.2018-04.2019. The adjustment includes estimated deferred revenues associated with the Decoupling Mechanism assuming the decoupling base is updated by Pro Forma Normalized Revenue at present rates. Ms. Knox sponsors this adjustment. The effect of this adjustment increases Washington net operating income by $\$ 710,000$.

## Rate Year 3 (May 1, 2020 - April 30, 2021) Adjustments

Q. Please explain each of the Rate Year 3 adjustments included on page 10 of Exh. EMA-9.
A. Page 10 of Exh. EMA-9 includes the following adjustments:

Rate Period Capital Additions (AMA) 05.2020-04.2021, column (20.01), this adjustment includes planned capital additions for the period May 1, 2020 through April 30, 2021, together with the associated A/D and ADFIT for the period 12-months ended April 30, 2021 on an AMA basis. Annual depreciation for these capital additions are also included in this adjustment. The associated ADFIT includes the repairs deduction and bonus tax depreciation expected through April 2021 on an AMA basis. In addition, total plant-in-service as of AMA 04.2020 was adjusted to a 04.2021 AMA basis. The effect of this adjustment increases rate base by $\$ 15,897,000$ and decreases net operating income by $\$ 1,147,000$. Ms. Schuh sponsors this adjustment.

Rate Period O\&M/A\&G (2.71\%) Expense, column (20.02), reflects the annual planned increase in operating expenses of $2.71 \%$, including O\&M, customer service, and
administrative and general expenses. Per the Company's current financial forecast, the annual percentage increase in O\&M has been reduced to reflect "efficiency reductions" in O\&M, resulting in an O\&M average increase of $2.71 \%$ on a system basis over the fouryear period 2017 to 2020 for the combined electric and natural gas systems. This $2.71 \%$ growth in operating expenses is a significant reduction from the prior year's average growth in O\&M expenses, and reflects an effort by the Company to reduce its O\&M expenses from previous years. The effect of this adjustment decreases Washington net operating income by $\$ 655,000$.

Rate Period Property Tax Expense, column (20.03), restates the Rate Year 2 level of property tax expense (beginning May 1, 2019) included in adjustment (19.03) Rate Period Property tax, to the level of property tax expense the Company will experience during Rate Year 3 beginning May 1, 2020. The property on which the tax is calculated is the property value as of December 31, 2019. The effect of this adjustment decreases net operating income by $\$ 133,000$.

Rate Period Revenues 05.2020-04.2021, column (20.04), reflects the incremental revenue at present rates from loads and customers included in the Company's forecast for the period 12-months ended April 30, 2021 compared to the Rate Period Revenues 05.2019-04.2020. The adjustment includes estimated deferred revenues associated with the Decoupling Mechanism assuming the decoupling base is updated by Pro Forma Normalized Revenue at present rates. Ms. Knox sponsors this adjustment. The effect of this adjustment increases Washington net operating income by $\$ 715,000$.


[^0]:    ${ }^{1}$ The Company reviewed large capital additions in 2017 to determine any offsets (e.g., reduced O\&M costs, reduced load losses, etc.). Maintenance records were reviewed to determine whether any specific maintenance costs were incurred in the test year that would be reduced or eliminated by the investment. Those costs were quantified and included as a reduction to O\&M expenses in adjustment (3.11) Pro Forma O\&M Savings included in Exh. EMA-6 and Exh. EMA-9.
    ${ }^{2}$ The IRS extended bonus depreciation through 2019. The Company has included bonus depreciation through 2019 within its capital adjustments.

