BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-20_____

DOCKET NO. UG-20_____

EXH. AMM-13

ADRIEN M. MCKENZIE

REPRESENTING AVISTA CORPORATION

FLOTATION COST STUDY

ELECTRIC & GAS UTILITIES

| | | | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|-------------|-------------|-----------------------------------|------------------------|-------------------------|--------------------|------------------------|-----------------------------|--------------------------|-----------------------------|----------------------------------|------------------|
| | | | | (1) | | Underwriting | | 0.00 | Total | Gross Proceeds | |
| N .7 | a | a | | Shares | Offering | Discount | Underwriting | Offering | Flotation | Before Flot. | Cost |
| | Sym | Company ALLETE | Date 2/27/2014 | Issued | Price | (per share) | Discount | Expense \$450,000 | Costs \$6,056,825 | Costs | (%) 3.781% |
| 1 | ALE 1 NT | | | 3,220,000 | \$49.75 \$52.63 | \$1.74125 \$0.20500 | \$5,606,825 \$1,468,412 | | \$6,056,825 \$1,968,413 | \$160,195,000 | |
| 2 3 | LNT AEE | Alliant Energy | 11/14/2019 8/5/2019 | 3,717,502 | \$52.63 \$74.30 | \$0.39500 \$0.12000 | \$1,468,413 \$905,905 | \$500,000 \$750,000 | | \$195,652,130 | 1.006% 0.295% |
| 3 4 | AEE | Ameren Corp. American Elec Pwr | 8/3/2019 4/2/2009 | 7,549,205 69,000,000 | \$74.30 \$24.50 | \$0.12000 \$0.73500 | \$903,903 \$50,715,000 | \$730,000 \$400,000 | \$1,655,905 \$51,115,000 | \$560,905,932 \$1,600,500,000 | 0.295% 3.024% |
| 4 5 | AGR | Avangrid, Inc. | 4/2/2009 | 09,000,000 | \$24.30 | \$0.75500 | \$30,713,000 N/A | \$400,000 | \$51,115,000 | \$1,690,500,000 | 5.024% |
| 6 | AVA | Avista Corp. | 12/13/2006 | 3,162,500 | \$25.05 | \$0.48000 | \$1,518,000 | \$300,000 | \$1,818,000 | \$79,220,625 | 2.295% |
| 7 | BKH | Black Hills Corp. | 11/19/2015 | 6,325,000 | \$40.25 | \$0.48000 \$1.40875 | \$8,910,344 | \$1,200,000 | \$10,110,344 | \$254,581,250 | 3.971% |
| 8 | CNP | CenterPoint Energy | 9/27/2018 | 60,550,459 | \$40.25 \$27.25 | \$0.75000 | \$45,412,844 | \$1,000,000 | \$46,412,844 | \$1,650,000,008 | 2.813% |
| 9 | CMS | CMS Energy Corp. | 3/31/2005 | 23,000,000 | \$12.25 | \$0.42880 | \$9,862,400 | \$325,000 | \$10,187,400 | \$281,750,000 | 3.616% |
| 10 | ED | Consolidated Edison (a) | 5/7/2019 | 5,800,000 | \$84.83 | \$0.59000 | \$3,422,000 | \$400,000 | \$3,822,000 | \$492,014,000 | 0.777% |
| 11 | D | Dominion Energy (a) | 3/29/2018 | 20,000,000 | \$67.33 | \$1.89420 | \$37,884,000 | \$450,000 | \$38,334,000 | \$1,346,516,000 | 2.847% |
| 12 | DTE | DTE Energy Co. | 10/29/2019 | 2,400,000 | \$126.00 | \$3.15000 | \$7,560,000 | \$300,000 | \$7,860,000 | \$302,400,000 | 2.599% |
| 13 | DUK | Duke Energy Corp. (a) | 11/18/2019 | 25,000,000 | \$85.99 | \$2.66000 | \$66,500,000 | \$592,000 | \$67,092,000 | \$2,149,750,000 | 3.121% |
| 14 | EIX | Edison International | 7/30/2019 | 28,000,000 | \$68.50 | \$1.62688 | \$45,552,500 | \$725,000 | \$46,277,500 | \$1,918,000,000 | 2.413% |
| 15 | EE | El Paso Electric Co. | | -,, | | | N/A | , | , | , ,,, | |
| 16 | ETR | Entergy Corp. | 6/8/2018 | 13,289,037 | \$75.25 | \$0.80000 | \$10,631,230 | \$650,000 | \$11,281,230 | \$1,000,000,034 | 1.128% |
| 17 | EVRG | Evergy Inc. | | | | | N/A | | | | |
| 18 | ES | Eversource Energy | 5/30/2019 | 15,600,000 | \$71.48 | \$1.69000 | \$26,364,000 | \$615,000 | \$26,979,000 | \$1,115,088,000 | 2.419% |
| 19 | EXC | Exelon Corp. | 6/13/2014 | 57,500,000 | \$35.00 | \$1.05000 | \$60,375,000 | \$600,000 | \$60,975,000 | \$2,012,500,000 | 3.030% |
| 20 | FE | FirstEnergy Corp. | 9/15/2003 | 32,200,000 | \$30.00 | \$0.97500 | \$31,395,000 | \$423,000 | \$31,818,000 | \$966,000,000 | 3.294% |
| 21 | FTS | Fortis Inc. | | | | | N/A | | | | |
| 22 | HE | Hawaiian Elec. | 3/20/2013 | 7,000,000 | \$26.75 | \$1.00312 | \$7,021,840 | \$450,000 | \$7,471,840 | \$187,250,000 | 3.990% |
| 23 | IDA | IDACORP, Inc. | 12/10/2004 | 4,025,000 | \$30.00 | \$1.20000 | \$4,830,000 | \$300,000 | \$5,130,000 | \$120,750,000 | 4.248% |
| 24 | MGEE | E MGE Energy | 9/10/2004 | 1,265,000 | \$31.85 | \$1.03500 | \$1,309,275 | \$125,000 | \$1,434,275 | \$40,290,250 | 3.560% |
| 25 | NEE | NextEra Energy, Inc. (a) | 11/3/2016 | 13,800,000 | \$124.00 | \$1.89000 | \$26,082,000 | \$750,000 | \$26,832,000 | \$1,711,200,000 | 1.568% |
| 26 | NWE | NorthWestern Corp. (a) | 9/30/2015 | 1,100,000 | \$51.81 | \$1.33000 | \$1,463,000 | \$1,000,000 | \$2,463,000 | \$56,991,000 | 4.322% |
| 27 | OGE | OGE Energy Corp. | 8/22/2003 | 5,324,074 | \$21.60 | \$0.79000 | \$4,206,018 | \$325,000 | \$4,531,018 | \$114,999,998 | 3.940% |
| 28 | OTTR | Otter Tail Corp. | | | | | N/A | | | | |
| 29 | PNW | Pinnacle West Capital | 4/9/2010 | 6,900,000 | \$38.00 | \$1.33000 | \$9,177,000 | \$190,000 | \$9,367,000 | \$262,200,000 | 3.572% |
| 30 | PNM | PNM Resources | 1/7/2020 | 5,375,000 | \$47.21 | \$1.99000 | \$10,696,250 | \$750,000 | \$11,446,250 | \$253,753,750 | 4.511% |
| 31 | POR | Portland General Elec. | 6/13/2013 | 12,765,000 | \$29.50 | \$0.95875 | \$12,238,444 | \$600,000 | \$12,838,444 | \$376,567,500 | 3.409% |
| 32 | PPL | PPL Corp. | 5/10/2018 | 55,000,000 | \$27.00 | \$0.29430 | \$16,186,500 | \$1,000,000 | \$17,186,500 | \$1,485,000,000 | 1.157% |
| 33 | PEG | Pub Sv Enterprise Grp. | 10/2/2003 | 9,487,500 | \$41.75 | \$1.25250 | \$11,883,094 | \$350,000 | \$12,233,094 | \$396,103,125 | 3.088% |
| 34 | SRE | Sempra Energy | 1/5/2018 | 26,869,158 | \$107.00 | \$1.92600 | \$51,749,998 | \$1,500,000 | \$53,249,998 | \$2,874,999,906 | 1.852% |
| 35 | SO | Southern Company (a) | 8/18/2016 | 32,500,000 | \$49.30 | \$1.66000 | \$53,950,000 | \$557,000 | \$54,507,000 | \$1,602,250,000 | 3.402% |
| 36 | WEC | WEC Energy Group | | | | | N/A | | | | |
| 37 | XEL | Xcel Energy Inc. (a) | 10/30/2019 | 10,300,000 | \$62.69 | \$0.63000 | \$6,489,000 | \$650,000 | \$7,139,000 | \$645,707,000 | 1.106% |
| | | Average | | | | | | | | | 2.779% |
| | | | | | | | | | | | |
| 1 | 4.000 | | 11/20/2010 | 7 000 007 | ¢02.77 | ¢0.07/00 | ¢C 04C 200 | ¢1.000.000 | 67 04C 200 | ¢ (50,000,000 | 1 2070/ |
| 1 | ATO | Atmos Energy Corp. | 11/30/2018 | 7,008,087 | \$92.75 | \$0.97690 | \$6,846,200 | \$1,000,000 | \$7,846,200 | \$650,000,069 | 1.207% |
| 2 | CPK | Chesapeake Utilities | 9/23/2016 | 960,488 | \$62.26 | \$2.33000 | \$2,237,937 | \$162,046 | \$2,399,983 | \$59,799,983 | 4.013% |
| 3 | NJR | New Jersey Resources | 12/4/2019 | 5,700,000 | \$41.25 | \$1.23750 | \$7,053,750 | \$500,000 | \$7,553,750 | \$235,125,000 | 3.213% |
| 4 | NI | NiSource Inc. | 5/3/2017 | N/A | N/A | N/A | \$10,000,000 | \$57,950 \$400,000 | \$10,057,950 | \$500,000,000 | 2.012% |
| 5 | | Northwest Nat. Holding Co. | 6/4/2019 | 1,250,000 | \$67.00 | \$2.17750 | \$2,721,875 | \$400,000 | \$3,121,875 | \$83,750,000 | 3.728% |
| 6 7 | OGS | ONE Gas, Inc. | 4/20/2019 | 11.016.040 | \$20.50 | \$1.02250 | N/A \$11,275,000 | \$700,000 | \$12,075,000 | \$224,000,007 | 2 7150/ |
| 7 ° | SJI SWV | South Jersey Industries | 4/20/2018 | 11,016,949 | \$29.50 \$75.50 | \$1.03250 \$2.54810 | \$11,375,000 \$7,800,110 | | | \$324,999,996 | 3.715% |
| 8 9 | SWX | Southwest Gas Spire Inc. | 11/28/2018 | 3,100,000 | \$75.50 \$63.05 | \$2.54810 \$2.10938 | \$7,899,110 \$4,218,760 | \$600,000 \$325,000 | \$8,499,110 \$4,543,760 | \$234,050,000 \$126,100,000 | 3.631% |
| 9 10 | SR UGI | 1 | 5/9/2018 3/18/2004 | 2,000,000 | \$63.05 \$32.10 | | \$4,218,760 \$12,112,050 | \$325,000 \$1,149,550 | \$4,543,760 \$13,262,500 | \$126,100,000 \$276,862,500 | 3.603% |
| 10 | 001 | UGI Corporation | 3/18/2004 | 8,625,000 | \$32.10 | \$1.40440 | \$12,112,950 | \$1,149,550 | \$13,262,500 | \$276,862,500 | 4.790% |
| | | Average | | | | | | | | | 3.324% |

Average - Electric & Gas

Column Notes:

(1-4) SEC Form 424B for each company.

(5) Column (2) * Column (4)

(6) SEC Form 424B for each company.

(7) Column (5) + Column (6)

(8) Column (2) * Column (3)

(9) Column (7) / Column (8)

Note (a): Underwriting discount computed as the difference between the current market price and the price offered to the issuing company by the underwriters.

2.902%