

DOCKETS UE-160228 & UG-160229  
JOINT ISSUES LIST - ELECTRIC  
November 7, 2016

Adj #	ISSUE	DESCRIPTION	AVISTA - AS FILED		AVISTA - REBUTTAL (including November power supply Update)		COMMISSION STAFF		PUBLIC COUNSEL (A)		ICNU			NWIGU		THE ENERGY PROJECT		
			Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base
			\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands			\$'s in Thousands		\$'s in Thousands		
<b>ATTRITION STUDY</b>																		
1					(1)							(960)	96,756	1,326,360				
2		<b>2017 Attrition Study</b>	\$38,568	\$1,475,472	\$39,491	\$1,466,978	\$20,306	\$1,418,562	<b>Reject attrition adjustments based on failure to demonstrate that costs are escalating beyond the utility's control</b>									
3		<b>2018 Attrition Study</b>	\$48,869	\$1,494,590	\$48,477	\$1,486,821	\$29,993	\$1,438,578		ICNU opposes a second year rate increase justified on the basis of an Attrition Allowance								
4		<b>Incremental 2018 Attrition Study - 6 months (Jan 2018-Jun 2018) beyond 2017</b>	\$10,301		\$8,986		\$9,687	\$20,016										
(1) The company is not requesting a higher increase than its original filing of \$38.6 million for 2017 and \$10.3 million for January to June 2018 (6 months).																		
<b>PRO FORMA STUDY</b>																		
5	1.00	Results of Operations	Results of Operations - actual operating results and total net rate base experienced by the Company for the twelve-month period ending September 30, 2015 on an average-of-monthly-average (AMA) basis.		(\$3,260)	\$1,309,195	(\$2,415)	\$1,309,195	(\$10,441)	\$1,309,195			(11,497)	102,043	1,309,195			
6	1.01	Deferred FIT Rate Base	Adjusts DFIT rate base balance to reflect the deferred tax balances arising from accelerated tax depreciation (Accelerated Cost Recovery System, or ACRS, and Modified Accelerated Cost Recovery, or MACRS, repairs deduction and bonus depreciation), bond refinancing premiums, and contributions in aid of construction. The increase in ADFIT (which is a reduction of rate base) included in this adjustment is primarily due to the annualizing of tax depreciation adjustments for the repairs deduction and bonus depreciation related to the 2015 federal tax return.		(\$703)	(\$6,556)	(\$706)	(\$6,556)	(\$667)	(\$6,556)			(662)	(65)	(6,556)			
7	1.02	Deferred Debits and Credits	Consolidation of previous Commission Basis or other restating rate base adjustments (Colstrip 3 AFUDC Elimination, Colstrip Common AFUDC, Kettle Falls Disallowance, Settlement Exchange Power, Restating CDA Settlement Deferral, Restating CDA/SSR, Spokane River Def, Spokane River PM&E, Montana Riverbed Lease, Lancaster Amortization, Customer Advances and Customer Deposits).		(\$2,479)	(\$6,302)	(\$2,482)	(\$6,302)	(\$2,064)	(\$6,302)			(5,965)	3,241	(6,302)			
8	1.03	Working Capital	Includes Working Capital using the Investor Supplied Working Capital (ISWC) methodology consistent with Docket No. UE-150204 and UE-150205.		\$467	\$4,352	\$468	\$4,352	\$443	\$4,352			439	43	4,352			
9	1.04	Plant Held for Future Use	Includes certain property as rate base that the Company owned at the time of this filing that has been recorded as held for future use.		\$582	\$5,431	\$492	\$4,569	\$0	\$0			-	-	-			
10	2.01	Eliminate B & O Taxes	Eliminates the revenues and expenses associated with local business and occupation (B & O) taxes.		\$101	\$0	\$101	\$0	\$101	\$0			101	(62)	-			

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11	2.02	Restate Property Tax	Restates the accrued property tax during the test period to actual property tax paid during 2015.	\$456	\$0	(\$349)	\$0	(\$349)	\$0			(349)	216	-				
12	2.03	Uncollectable Expense	Restates the accrued expense to the actual level of net write-offs for the test period.	\$1,105	\$0	\$1,105	\$0	\$1,105	\$0			1,105	(685)	-				
13	2.04	Regulatory Expense	Restates recorded regulatory expense for the twelve-months-ended September 30, 2015 to reflect the UTC assessment rates applied to revenues for the test period and the actual levels of FERC fees paid during the test period.	\$19	\$0	\$19	\$0	\$19	\$0			19	(12)	-				
14	2.05	Injuries and Damages	Replaces accrued injuries and damages expense with a six-year rolling average of actual injuries and damages payments not covered by insurance.	\$190	\$0	\$190	\$0	\$190	\$0			190	(118)	-				
15	2.06	FIT/DFIT/ ITC/PTC Expense	Adjusts the FIT and DFIT calculated at 35% within Results of Operations, revising the Section 199 Manufacturing Permanent M Deduction to the amount that should have been accrued for the period ending September 30, 2015. This adjustment also adjusts the appropriate level of production tax credits and investment tax credits on qualified generation.	(\$913)	\$0	(\$913)	\$0	(\$913)	\$0			(913)	566	-				
16	2.07	Office Space Charges to Subsidiaries	Removes the remaining portion of office space costs associated with subsidiary/non-utility activities not previously removed during the test period.	(\$35)	\$0	(\$35)	\$0	(\$35)	\$0			(35)	21	-				
17	2.08	Restate Excise Taxes	Removes the effect of a one-month lag between collection and payment of taxes.	(\$349)	\$0	\$116	\$0	(\$349)	\$0			(349)	216	-				
18	2.09	Net Gains / Losses	Ten-year amortization of net gains realized from the sale of real property disposed of between 2006 and September 30, 2015.	(\$83)	\$0	(\$94)	\$0	(\$83)	\$0			(83)	51	-				
19	2.10	Weather Normalization	Adjustment normalizes weather sensitive kWh sales by eliminating the effect of temperature deviations above or below historical norms.	(\$3,108)	\$0	(\$3,108)	\$0	(\$3,108)	\$0			(3,108)	1,927	-				
20	2.11	Eliminate Adder Schedules	Removes the impact of the adder schedule revenues and related expenses, such as Schedule 91 Tariff Rider (DSM), Schedule 92 Low Income Rate Assistance Program Rate, Schedule 93 ERM rebate, Schedule 94 BPA rebate, and Schedule 59 Residential Exchange credit, since these items are recovered/rebated by separate tariffs and, therefore, are not part of base rates.	\$0	\$0	\$0	\$0	\$0	\$0			-	-	-				

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21	2.12	Miscellaneous Restating Expenses	Removes a number of non-operating or non-utility expenses associated with dues and donations included in error in the test period actual results, as well as prior period/non-recurring expenses. In addition, the Company removed 50% of Director meeting expenses, 10% D&O insurance, Long-Term Incentive Plan (LTIP) restricted share expenses, and adjusted Director Fees expense to reflect a 97% (Utility) / 3% (Non-Utility) as proposed by the Company. Lastly, this adjustment removes or restates other expenses incorrectly charged between service and or jurisdiction.	(\$858)	\$0	(\$858)	\$0	(\$858)	\$0			(1,204)	747	-				
22	2.13	Eliminate WA Power Cost Deferral	Removes the effects of the financial accounting for the Energy Recovery Mechanism (ERM.)	(\$8,121)	\$0	(\$8,121)	\$0	(\$8,121)	\$0			(8,121)	5,034	-				
23	2.14	Nez Perce Settlement Adjustment	This adjustment directly assigns the Nez Perce Settlement expenses to the Washington and Idaho jurisdictions based on differing regulatory treatment in Idaho Case No. WWP-E-98-11 and Washington Docket No. UE-991606.	(\$9)	\$0	(\$9)	\$0	(\$9)	\$0			(9)	6	-				
24	2.15	Restate Debt Interest	Restates debt interest using the Company's pro forma weighted average cost of debt.	(\$702)	\$0	(\$999)	\$0	(\$694)	\$0			(253)	157	-				
25	2.16	Restate Incentive Expenses	Reduces actual incentives included in the Company's test period ending September 30, 2015 to reflect a six-year average of payout percentages.	(\$1,291)	\$0	\$777	\$0	\$903	\$0			903	(560)	-				
26	3.00	Pro Forma Power Supply	This adjustment includes pro forma power supply related revenue and expenses to reflect the twelve-month period January 1, 2017 through December 31, 2017, using historical loads.	\$5,795	\$0	\$7,839	\$0	\$5,224	\$0			4,482	(2,778)	-				
27	3.01	Pro Forma Transmission Revenues/Expenses	This adjustment includes pro forma transmission-related revenues and expenses to reflect the twelve-month period January 1, 2017 through December 31, 2017.	\$596	\$0	(\$350)	\$0	\$411	\$0			(349)	217	-				
28	3.02	Pro Forma Labor Non-Exec	Reflects changes to test period union and non-union wages and salaries to reflect increases through 2016. Union salary increases for 2017 are also included in accordance with union contract terms.	\$2,176	\$0	\$2,176	\$0	\$2,176	\$0			1,295	(803)	-				
29	3.03	Pro Forma Labor Exec	Reflects changes to reflect an annualized 2015 level of allocated executive officer salaries. Total salary levels were allocated based on the actual allocation as of September 30, 2015 consistent with Order No. UE-150204 and UG-150205.	\$57	\$0	\$57	\$0	\$57	\$0			57	(35)	-				
30	3.04	Pro Forma Employee Benefits	Adjusts for changes in both the Company's pension and medical insurance expense.	\$1,210	\$0	\$3,870	\$0	\$1,405	\$0			1,210	(750)	-				

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31	3.05	Pro Forma Regulatory Amortization Adj	Removes various amortization expenses included in the Company's test period that expire prior to the 2017 rate year. The expiring regulatory amortizations include: 1) 2011 deferred Colstrip and Coyote Springs 2 thermal maintenance expense, and a 4-year Amortization of the 2011 deferral amount; 2) BPA Settlement Deferral; 3) Canada to Northern California (CNC) Transmission Project; 4) LiDAR O&M and Deferred O&M; and 5) Wartsila Generator (Small Gen) expenses.	(\$412)	\$0	(\$1,788)	\$0	(\$1,788)	\$0			(1,788)	1,108	-				
32	3.06	Pro Forma Property Tax Expense	Restates the 2015 level of property tax expense included in adjustment (2.02) Restate 2015 Property Tax, to the 2016 level of expense. The property on which the tax is calculated is the property value as of December 31, 2015, reflecting the 2016 level of expense the Company will experience during 2016.	\$1,136	\$0	\$1,296	\$0	\$1,296	\$0			1,095	(679)	-				
33	3.07	Pro Forma Meter Deferral & Amortization	Reflects the removal of the estimated undepreciated value of the electric distribution meters, removing this balance from electric distribution plant, and recording it as a regulatory asset (added to regulatory deferred debits and credits rate base balance). (The impact to net rate base is therefore \$0.) This adjustment also reduces depreciation to reflect the net depreciation expense included in the 2017 rate period, as well as the amortization expense of the Regulatory Asset over the Company's proposed fifteen-year amortization schedule (starting in January 2017), with a return on the unamortized balance. .	\$1,209	\$0	\$0	\$0	\$0	\$0			-	-	-				
34	3.08	Pro Forma Revenue Normalization	Includes the revenue repricing of the 2016 authorized rates approved in Docket No. UE-150204.	\$3,207	\$0	\$3,207	\$0	\$3,207	\$0			3,207	(1,988)	-				
35	3.09	Pro Forma Capital Additions December 2015 AMA	Restates net plant included in the historical CBR test year from a September 30, 2015 AMA basis to a December 31, 2015 AMA basis, together with the associated A/D, ADFIT and depreciation expense at December 31, 2015, to reflect actual balances as of December 31, 2015.	\$3,970	\$18,307	\$3,978	\$18,307	\$4,538	\$21,609			4,521	(1,235)	21,609				
	3.09I	Pro Forma Capital-Incremental Dec 2015 AMA	Reflects actual 12-months ended December 2015 capital on an AMA basis, versus the original filing that included estimates for the last three months of 2015.	\$0	\$0	\$688	\$3,302											
36	3.10	Pro Forma 2016 Limited Capital Additions	Reflects increases related to certain 2016 capital additions, together with associated A/D and ADFIT. This adjustment also includes associated depreciation expense for these 2016 additions. This adjustment includes only identified Pro Forma projects that are one-half of one percent of the Company's rate base, representing a threshold for choosing specific capital projects to include within the modified test year Pro Forma Study.	\$11,244	\$86,690	\$11,459	\$86,376	\$7,107	\$60,831			7,058	35	60,831				

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37	3.11	Pro Forma O&M Offsets	For the specific 2016 capital projects included in Pro Forma 2016 Limited Capital Additions adjustment (3.10) above, maintenance records were reviewed to determine whether any specific maintenance costs were incurred in the test period that would be reduced or eliminated by the investment for that capital project. Those reductions in costs were quantified and included as a reduction to O&M.	(\$214)	\$0	(\$214)	\$0	\$0	\$0			-	-	-				
38	3.12	PF Major Maint Normalize CS2/Colstrip	Adjusts maintenance expense to normalize major maintenance expense associated with its Colstrip/Coyote Springs II (CS2) thermal projects per Order 05 of Docket UE-150204, including major maintenance expense associated with these plants over a three-year period for Colstrip and four-year period for CS2 to match the major maintenance cycles for each plant, rather than in total in the year the maintenance occurs.	\$862	\$0	\$862	\$0	\$862	\$0			862	(534)	-				
Rounding (immaterial)																		
												(8,142)	105,324	1,383,129				
<b>2017 CROSS CHECK STUDY</b>																		
The following adjustments begin the 2017 Cross Check adjustments included by the Company to include additional expenses and plant additions beyond the Pro Forma Study identified by the Company that are expected during the 2017 rate year.												ICNU opposes the inclusion of cross-check adjustments in the Traditional revenue requirement methodology						
39	4.00	Cross Check Capital Additions 2016 AMA (Incremental)	Reflects the additional 2016 capital additions beyond that included in adjustment (3.10) "Pro Forma 2016 Limited Capital Additions," discussed above, including associated depreciation expenses, A/D and ADFIT. This adjustment also adjusts total plant and associated A/D and ADFIT to calendar 2016 on an AMA basis.	\$7,053	\$2,234	\$6,222	\$18,626	\$0	\$0									
40	4.01	Cross Check Major Capital Additions 2017 AMA	Reflects the additional 2017 capital additions together with the associated A/D and ADFIT for 2017 on an AMA basis. This adjustment also includes associated depreciation expense for these 2017 additions. In addition, this adjustment adjusts total plant and associated A/D and ADFIT for 2016 to calendar year 2017 on an AMA basis.	\$14,901	\$69,281	\$16,341	\$69,028	\$0	\$0									
41	4.02	Cross Check Labor Non-Exec	Reflects the additional 2017 non-union labor increases expected in March 2017, excluded from Adjustment 3.02 "Pro Forma Labor Non-Exec."	\$681	\$0	\$681	\$0	\$0	\$0									

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42	4.03	Cross Check 2017 AMI Capital & Expense	Reflects the 2017 plant-in-service, and associated A/D and ADFIT on an AMA basis related to the Company's planned investment in its Advanced Metering Infrastructure (AMI) project. This adjustment also includes the associated depreciation expense for the 2017 AMI additions	\$5,659	\$20,703	\$3,790	\$8,792	\$0	\$0	Joint proposal with The Energy Project. Decline to approve AMI proposal at this time because expenses have not been fully developed, costs are not known and measurable, the project is not used and useful, benefits have not been proven, and the project has not been shown to be prudent or cost effective.								
43	4.04	Cross Check Information Tech/Service Expense	Includes the incremental costs associated with software development, application licenses, maintenance fees, and technical support for a range of information services programs.	\$1,957	\$0	\$1,957	\$0	\$0	\$0									
44	4.05	Cross Check Property Tax	Restates the pro forma level of property tax expense included in Pro Forma Property Tax Adjustment (3.06), to property tax levels expected during the 2017 rate period, based on property values expected as of December 31, 2016.	\$1,301	\$0	\$1,485	\$0	\$0	\$0									
45	4.06	Cross Check Insurance Expense	Adjusts actual test period insurance expense related to the utility for general liability, directors and officers ("D&O") liability, and property to reflect the expected 2017 level of insurance.	\$80	\$0	\$80	\$0	\$0	\$0									
	4.07	Cross Check Employee Benefits	This adjustment reflects updates to reflect actual medical claims expense for 2016 and the most recent medical premium cost estimate for 2017 received from our medical underwriter			\$856	\$0											
46	4.08	Reconcile 2017 Cross Check to Attrition	Represents the difference between the 2017 Cross Check Study and the Attrition Study.	(\$4,906)	(\$27,863)	(\$8,179)	(\$42,711)	\$0	\$0									
47	4.09	Staff Proposed Attrition Allowance	Represents the difference between Staff's attrition studies and Staff's modified historical test year.	\$0	\$0	\$0	\$0	\$26,005	\$70,184									
			Rounding (immaterial)	(\$3)														
48			<b>Revenue Requirement</b>	<b>\$ 38,568</b>	<b>\$ 1,475,472</b>	<b>\$ 39,491</b>	<b>\$ 1,466,978</b>	<b>\$ 25,570</b>	<b>\$ 1,453,313</b>									
<b>2018 CROSS CHECK STUDY</b>																		
49	The following adjustments begin the 2018 Cross Check adjustments included by the Company to include additional expenses and plant additions beyond the 2017 Cross Check Study identified by the Company for the (Jan-Jun) 2018 rate period.																	

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50	18.01	Cross Check Power Supply	\$2,921	\$0	\$1,438	\$0	\$0	\$0									
51	18.02	Cross Check Transmission Revenues/Expenses	\$203	\$0	\$203	\$0	\$0	\$0									
52	18.03	Cross Check Labor Non-Exec	\$814	\$0	\$814	\$0	\$0	\$0									
53	18.04	Cross Check Major Capital Additions 2018 AMA	\$3,105	(\$4,895)	\$3,279	(\$2,449)	\$0	\$0									
54	18.05	Cross Check 2018 AMI Capital & Expense	\$4,009	\$17,483	\$4,747	\$15,183	\$0	\$0	<p style="text-align: center;"><b>Joint proposal with The Energy Project. Decline to approve AMI proposal at this time because expenses have not been fully developed, costs are not known and measurable, the project is not used and useful, benefits have not been proven, and the project has not been shown to be prudent or cost effective.</b></p>								
55	18.06	Cross Check Insurance Expense	\$69	\$0	\$69	\$0	\$0	\$0									

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56	18.07	Cross Check Information Tech/Service Expense	\$412	\$0	\$412	\$0	\$0	\$0									
57	18.08	Reconcile 2018 Cross Check to Attrition	(\$1,234)	\$6,530	(\$1,976)	\$7,109	\$0	\$0									
58		Rounding (immaterial)	\$2														
59		<b>Revenue Requirement</b>	<b>\$ 48,869</b>	<b>\$ 1,494,590</b>	<b>\$ 48,477</b>	<b>\$ 1,486,821</b>											
60		<b>Incremental 2018 Attrition/Cross Check Total</b>	<b>\$ 10,301</b>	<b>\$ 19,118</b>	<b>\$ 8,986</b>	<b>\$ 19,843</b>											
61																	
62		<b>COST OF CAPITAL</b>															
63		Cost of Capital - Return on Equity		9.90%		9.90%		9.20%					9.10%				
64		Cost of Capital - Cost of Debt		5.51%		5.59%		5.51%					5.51%				
65		Cost of Capital - Capital Structure		48.5		48.5		48.5					48.50%				
66		Rate of Return		7.64%		7.68%		7.30%					7.25%				
67																	
68		<b>COST OF SERVICE/RATE SPREAD/RATE DESIGN</b>															
		<b>COST OF SERVICE</b>											1) Allocate production fixed costs via peak demand approach or modify demand allocator if Peak Credit classification retained; 2) Use "Summer and Winter Peak Method" as measure of demand component for allocating production costs; 3) 12 CP demand allocation method for transmission system costs; 4) Allocate G&I plant associated with AMI on same basis as AMI meters.				



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69		Rate Spread			17.5% Movement towards Unity	17.5% Movement towards Unity	Uniform % Rate increase across all schedules											
70		Rate Design - Schedule 1			<ul style="list-style-type: none"> <li>Increase Basic Charge to \$9.50/month in 2017, no change 2018</li> <li>Uniform C increase to Blocks</li> </ul>	<ul style="list-style-type: none"> <li>Increase Basic Charge to \$9.50/month in 2017, no change 2018</li> <li>Uniform C increase to Blocks</li> </ul>												
71		Rate Design - Schedule 11			<ul style="list-style-type: none"> <li>Increase Customer Charge from \$18.00 to \$20.00 in 2017, no change 2018</li> <li>Increase Demand from \$6.00 to \$6.50/kW in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>	<ul style="list-style-type: none"> <li>Increase Customer Charge from \$18.00 to \$20.00 in 2017, no change 2018</li> <li>Increase Demand from \$6.00 to \$6.50/kW in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>	No change to Basic Charges											
72		Rate Design - Schedule 21			<ul style="list-style-type: none"> <li>Minimum Demand remains at \$500</li> <li>Increase Demand from \$6.00 to \$6.50/kW in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>	<ul style="list-style-type: none"> <li>Minimum Demand remains at \$500</li> <li>Increase Demand from \$6.00 to \$6.50/kW in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>	Support Company proposed increase to demand charges											
73		Rate Design - Schedule 25			<ul style="list-style-type: none"> <li>Minimum Demand remains at \$21000</li> <li>Increase Demand from \$6.00 to \$6.50/kVA in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>	<ul style="list-style-type: none"> <li>Minimum Demand remains at \$21000</li> <li>Increase Demand from \$6.00 to \$6.50/kVA in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>	Support Company proposal to discontinue HPS light offerings to new customers  <b>Oppose ICNU proposals on Scheds 25 and 91; oppose ICNU demand response proposal</b>											

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				Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	NOI	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base
74		Rate Design - Schedule 31			<ul style="list-style-type: none"> <li>Increase Customer Charge from \$18.00 to \$20.00 in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>	<ul style="list-style-type: none"> <li>Increase Customer Charge from \$18.00 to \$20.00 in 2017, no change 2018</li> <li>Uniform % Blocks</li> </ul>												
75		Rate Design - Schedule Lighting			<ul style="list-style-type: none"> <li>Uniform Percentage Increase in 2017 and 2018</li> <li>HPS Lights No Longer Available for Schedules 42 &amp; 47</li> </ul>	<ul style="list-style-type: none"> <li>Uniform Percentage Increase in 2017 and 2018</li> <li>HPS Lights No Longer Available for Schedules 42 &amp; 47</li> </ul>												
76		Demand Response - Schedule 78 - Large Customer Demand Response Pilot Program				No								See proposal RRS-1TC at 43-47 & RRS-10				
77		<b>OTHER ISSUES</b>																
78		(A) Public Counsel Column includes positions for which Public Counsel is Neutral in its Direct Testimony. For items that parties are neutral in direct, parties may adopt, support, or oppose other parties' positions and develop a recommendation in later stages of this proceeding, including on brief. This issues list does not include positions that may be taken in rebuttal or cross-answering testimony.																
79		Advance Metering Infrastructure Proposal						Reject as not ripe for prudence review		Joint proposal with The Energy Project. Decline to approve AMI proposal at this time because expenses have not been fully developed, costs are not known and measurable, the project is not used and useful, benefits have not been proven, and the project has not been shown to be prudent or cost effective.				Reject AMI Proposal				

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80		Montana Riverbed Lease					If the Commission does not include recovery of the Montanan Riverbed Lease for the rate period, as proposed by the Company in this case, the unique circumstances surrounding the Montanan Riverbed Lease may warrant deferred accounting treatment as a solution to address the concerns expressed by parties in this case, and would also meet the needs of the Company.												
								Staff accepts test year expense without escalated amounts. Staff does not support deferred accounting treatment.											
81		ERM Offset			2018 Electric Increase offset using Energy Recovery Mechanism Deferral Balance for Jan. 1, 2018 through June 30, 2018		2018 Electric Increase offset using Energy Recovery Mechanism Deferral Balance for Jan. 1, 2018 through June 30, 2018												
								Decline the use of ERM funds to offset a rate increase.											
82		Power Supply update (60 days prior to effective date January 1, 2017 & 2018)			The Company proposes to update its power supply costs sixty (60) days prior to new rates going into effect in January 2017, as well as January 2018, to reflect the most recent information available for power supply costs. The updated power supply cost data will not only be reflected in the base rate adjustment, but will also reset the base for the ERM calculations for the future rate period.		The Company proposes to update its power supply costs sixty (60) days prior to new rates going into effect in January 2017, as well as January 2018, to reflect the most recent information available for power supply costs. The updated power supply cost data will not only be reflected in the base rate adjustment, but will also reset the base for the ERM calculations for the future rate period. Will also reflect updated Power and Transmission Contracts as discussed in Exhibit No. WGJ-6T												
								A second power cost update is unnecessary. The baseline set for 2017 will suffice for the first one-half of 2018.											

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83		Generic Cost of Service Proceeding						Implement a Generic Cost of Service Proceeding to review and evaluate numerous issues on cost of service methodology in Washington					Support Staff's recommendation that the Commission institute a generic proceeding to review cost of service methodologies for all investor-owned utilities in Washington, with the caveats noted in Mr. Stephens' Cross-Answering Testimony (RRS-12T at 2:3-18)					
84		Multiple rate increases		Yes				No				No						

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#			\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands			\$'s in Thousands
<b>ATTRITION STUDY</b>														
3	2017 Attrition Study		\$4,397	\$298,315	\$7,926	\$299,414	Reject attrition adjustments based on failure to demonstrate that costs are escalating beyond the utility's control	\$2,074	\$289,739	(\$2,010)	\$21,148	\$274,514		
4	2018 Attrition Study		\$5,338	\$302,859	\$9,462	\$305,371		\$2,091	\$294,095	NWIGU opposes a second year rate increase justified on the basis of an Attrition Allowance				
5	Incremental 2018 Attrition Study - 6 months (Jan 2018-Jun 2018) beyond 2017		\$941		\$1,536			\$17	\$4,356					
(1) The company is not requesting a higher increase than its original filing of \$4.4 million for 2017 and \$941,000 for January to June 2018 (6 months).														
<b>PRO FORMA CROSS CHECK STUDY</b>														
5														
6	1.00	Per Results Report	Results of Operations - actual operating results and total net rate base experienced by the Company for the twelve-month period ending September 30, 2015 on an average-of-monthly-average (AMA) basis.	\$8,497	\$259,389	\$8,665	\$259,389		\$7,075	\$259,389	\$6,866	\$14,549	\$259,389	
7	1.01	Deferred FIT Rate Base	Adjusts DFIT rate base balance to reflect the deferred tax balances arising from accelerated tax depreciation (Accelerated Cost Recovery System, or ACRS, and Modified Accelerated Cost Recovery, or MACRS, repairs deduction and bonus depreciation ), bond refinancing premiums, and contributions in aid of construction. The change in ADFIT included in this adjustment is primarily due to the annualizing of tax depreciation adjustments for the repairs deduction and bonus depreciation related to the 2015 federal tax return.	\$5	\$50	\$5	\$50		\$5	\$50	\$5	\$0	\$50	
8	1.02	Deferred Debits and Credits	Consolidation of previous Commission Basis or other restating rate base adjustments (Customer Advances and Customer Deposits).	\$1	\$0	\$1	\$0		\$1	\$0	\$1	(\$1)	\$0	
9	1.03	Working Capital	Includes Working Capital using the Investor Supplied Working Capital (ISWC) methodology consistent with Docket No. UE-150204 and UE-150205.	\$303	\$2,828	\$304	\$2,828		\$288	\$2,828	\$285	\$28	\$2,828	
10	2.01	Eliminate B & O Taxes	Eliminates the revenues and expenses associated with local business and occupation (B & O) taxes.	\$15	\$0	\$15	\$0		\$15	\$0	\$15	(\$9)	\$0	
11	2.02	Restate Property Tax	Restates the accrued property tax during the test period to actual property tax paid during 2015.	(\$197)	\$0	(\$368)	\$0		(\$368)	\$0	(\$368)	\$228	\$0	
12	2.03	Uncollectible Expense	Restates the accrued expense to the actual level of net write-offs for the test period.	(\$328)	\$0	(\$328)	\$0		(\$328)	\$0	(\$328)	\$203	\$0	

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13	2.04	Regulatory Expense	Restates recorded regulatory expense for the twelve-months-ended September 30, 2015 to reflect the UTC assessment rates applied to revenues for the test period and the actual levels of FERC fees paid during the test period.	(\$13)	\$0	(\$13)	\$0			(\$13)	\$0	(\$13)	\$8	\$0		
14	2.05	Injuries and Damages	Replaces accrued injuries and damages expense with a six-year rolling average of actual injuries and damages payments not covered by insurance.	\$242	\$0	\$242	\$0			\$242	\$0	\$242	(\$150)	\$0		
15	2.06	FIT/DFIT Expense	Adjusts the FIT calculated at 35% within Results of Operations to reflect the appropriate Schedule M adjustment necessary to match a DFIT expense amount recorded related to WA natural gas decoupling.	(\$360)	\$0	(\$360)	\$0			(\$360)	\$0	(\$360)	\$223	\$0		
16	2.07	Office Space Charges to Subsidiaries	Removes the remaining portion of office space costs associated with subsidiary/non-utility activities not previously removed during the test period.	(\$9)	\$0	(\$9)	\$0			(\$9)	\$0	(\$9)	\$6	\$0		
17	2.08	Restate Excise Taxes	Removes the effect of a one-month lag between collection and payment of taxes.	(\$5)	\$0	(\$5)	\$0			(\$5)	\$0	(\$5)	\$3	\$0		
18	2.09	Net Gains/Losses	Ten-year amortization of net gains realized from the sale of real property disposed of between 2006 and September 30, 2015.	(\$6)	\$0	(\$9)	\$0			(\$6)	\$0	(\$6)	\$4	\$0		
19	2.10	Weather Normalization / Gas Cost Adjustment	Adjustment normalizes weather sensitive gas therm sales by eliminating the effect of temperature deviations above or below historical norms. This adjustment also restates therms sold to reflect the weather normalized therms and then reprices the adjusted therms sold based upon the authorized weighted average cost of gas.	(\$1,862)	\$0	(\$1,862)	\$0			(\$1,862)	\$0	(\$1,862)	\$1,154	\$0		
20	2.11	Eliminate Adder Schedules	Removes the impact of the adder schedule revenues and related expenses, such as Schedule 191 Tariff Rider (DSM), Schedule 192 Low Income Rate Assistance Program Rate, Schedule 155 Gas Cost surcharge or rebate, and Schedule 159 Decoupling surcharge or rebate, since these items are recovered/rebated by separate tariffs and, therefore, are not part of base rates.	\$0	\$0	\$0	\$0			\$0	\$0	\$0	\$0	\$0		

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21	2.12	Miscellaneous Restating Adjustments	Removes a number of non-operating or non-utility expenses associated with dues and donations included in error in the test period actual results, as well as prior period/non-recurring expenses. In addition, the Company removed 50% of Director meeting expenses, 10% D&O insurance, Long-Term Incentive Plan (LTIP) restricted share expenses, and adjusted Director Fees expense to reflect a 97% (Utility) / 3% (Non-Utility) as proposed by the Company. Lastly, this adjustment removes or restates other expenses incorrectly charged between service and or jurisdiction.	(\$233)	\$0	(\$233)	\$0			(\$233)	\$0	(\$333)	\$207	\$0		
22	2.13	Restate Debt Interest	Restates debt interest using the Company's pro forma weighted average cost of debt.	(\$139)	\$0	(\$198)	\$0			-137	\$0	(\$253)	\$157			
23	2.14	Restating Incentive Expense Adjustment	Reduces actual incentives included in the Company's test period ending September 30, 2015 to reflect a six-year average of payout percentages.	(\$513)	\$0	\$107	\$0			\$140	\$0	\$140	(\$87)			
24	2.15	Project Compass Deferral	This adjustment records the deferral of the natural gas revenue requirement amount for the period January through September 2015 per the Settlement Stipulation in Docket No. UG-140189, Section III, paragraph 7, page 4-5.	(\$1,578)	\$0	(\$1,578)	\$0			(\$1,578)	\$0	(\$1,578)	\$978			
25	3.00	Pro Forma Labor Non-Exec	Reflects changes to test period union and non-union wages and salaries to reflect increases through 2016. Union salary increases for 2017 are also included in accordance with union contract terms.	\$675	\$0	\$675	\$0			\$675	\$0	\$413	(\$256)			
26	3.01	Pro Forma Labor Exec	Reflects changes to reflect an annualized 2015 level of allocated executive officer salaries. Total salary levels were allocated based on the actual allocation as of September 30, 2015 consistent with Order No. UE-150204 and UG-150205.	(\$14)	\$0	(\$14)	\$0			(\$14)	\$0	(\$14)	\$8			
27	3.02	Pro Forma Employee Benefits	Adjusts for changes in both the Company's pension and medical insurance expense.	\$361	\$0	\$1,157	\$0			\$418	\$0	\$361	(\$224)			
28	3.03	Pro Forma Pipeline Safety Labor	Reflects an increase in labor costs required in order to meet standards and compliance requirements associated with new Pipeline Safety Management System requirements (API RP-1173).	\$109	\$0	\$62	\$0			\$0	\$0	-	-	-		

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				\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands			\$'s in Thousands	
29	3.04	Pro Forma Property Tax Expense	Restates the 2015 level of property tax expense included in adjustment (2.02) Restate 2015 Property Tax, to the 2016 level of expense. The property on which the tax is calculated is the property value as of December 31, 2015, reflecting the 2016 level of expense the Company will experience during 2016.	\$205	\$0	\$242	\$0			\$241	\$0	\$241	(\$150)			
30	3.05	Pro Forma Revenue Normalization	Includes the revenue repricing of the 2016 authorized rates approved in Docket No. UG-150205.	(\$12,907)	\$0	(\$12,907)	\$0			(\$12,907)	\$0	(\$12,907)	\$8,002			
31	3.06	Pro Forma Atmospheric Testing Expense	Adjusts the test period expense for atmospheric corrosion expense to reflect the inspection costs and follow-up remedial actions expected in 2017, based on an inspection cycle that will be completed one third of each jurisdiction per year.	\$247	\$0	\$247	\$0			\$247	\$0	\$247	(\$153)			
32	3.07	Pro Forma Regulatory Amortization	Includes the regulatory amortization expense associated with the approved two-year amortization of the deferred natural gas revenue requirement associated with the Company's Project Compass Customer Information System (CIS) for calendar year 2015. This adjustment first eliminates the 2015 deferral of the expense recorded as a September 2015 restating adjustment (2.15), which must be removed for the 2017 rate period.	\$2,709	\$0	\$2,709	\$0			\$2,709	\$0	\$2,709	(\$1,680)			
33	3.08	Pro Forma Capital Additions December 2015 AMA	Restates net plant included in the historical CBR test year from a September 30, 2015 AMA basis to a December 31, 2015 AMA basis, together with the associated A/D, ADFIT and depreciation expense at December 31, 2015, to reflect actual balances as of December 31, 2015.	\$1,258	\$6,106	\$1,261	\$6,106			\$1,626	\$9,640	\$1,619	(\$305)	\$9,640		
	3.09I	Pro Forma Capital-Incremental Dec 2015 AMA	Reflects actual 12-months ended December 2015 capital on an AMA basis, versus the original filing that included estimates for the last three months of 2015.	\$0	\$0	\$422	\$3,534									
34	3.09	Pro Forma 2016 Limited Capital Additions	Reflects increases related to certain 2016 capital additions, together with associated A/D and ADFIT. This adjustment also includes associated depreciation expense for these 2016 additions. This adjustment includes only identified Pro Forma projects that are one-half of one percent of the Company's rate base, representing a threshold for choosing specific capital projects to include within the modified test year Pro Forma Study.	\$2,440	\$18,120	\$1,896	\$13,167			\$837	\$7,488	\$831	\$28	\$7,488		



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35	3.10	Pro Forma Capital-Incremental Dec 2015 AMA	For the specific 2016 capital projects included in Pro Forma 2016 Limited Capital Additions adjustment (3.09) above, maintenance records were reviewed to determine whether any specific maintenance costs were incurred in the test period that would be reduced or eliminated by the investment for that capital project. Those reductions in costs were quantified and included as a reduction to O&M.	(\$59)	\$0	(\$59)	\$0			(\$36)	\$0	(\$36)	\$22			
Rounding (immaterial)												\$3	\$2			
												(\$4,094)	\$22,795	\$279,395		
<b>2017 CROSS CHECK STUDY</b>																
The following adjustments begin the 2017 Cross Check adjustments included by the Company to include additional expenses and plant additions beyond the Pro Forma Study identified by the Company that are expected during the 2017 rate year.																
36	4.00	Cross Check Labor Non-Exec	Reflects the additional 2017 non-union labor increases expected in March 2017, excluded from Adjustment 3.02 "Pro Forma Labor Non-Exec."	\$174	\$0	\$174	\$0			\$0	\$0	NWIGU opposes the inclusion of cross-check adjustments in the Traditional revenue requirement methodology				
37	4.01	Cross Check Capital Additions 2016 AMA	Reflects the additional 2016 capital additions beyond that included in adjustment (3.09) "Pro Forma 2016 Limited Capital Additions," discussed above, including associated depreciation expenses, A/D and ADFIT. This adjustment also adjusts total plant and associated A/D and ADFIT to calendar 2016 on an AMA basis.	\$1,696	\$1,383	\$1,497	\$4,970			\$0	\$0					
38	4.02	Cross Check Capital Additions 2017 AMA	Reflects the additional 2017 capital additions together with the associated A/D and ADFIT for 2017 on an AMA basis. This adjustment also includes associated depreciation expense for these 2017 additions. In addition, this adjustment adjusts total plant and associated A/D and ADFIT for 2016 to calendar year 2017 on an AMA basis.	\$2,717	\$8,956	\$3,250	\$10,172			\$0	\$0					

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39	4.03	Cross Check 2017 AMI Capital & Expense	Reflects the 2017 plant-in-service, and associated A/D and ADFIT on an AMA basis related to the Company's planned investment in its Advanced Metering Infrastructure (AMI) project. This adjustment also includes the associated depreciation expense for the 2017 AMI additions	\$2,176	\$9,003	\$1,154	\$3,034	Joint proposal with The Energy Project. Decline to approve AMI proposal at this time because expenses have not been fully developed, costs are not known and measurable, the project is not used and useful, benefits have not been proven, and the project has not been shown to be prudent or cost effective.		\$0	\$0						
40	4.04	Cross Check Information Tech/Serv Expense	Includes the incremental costs associated with software development, application licenses, maintenance fees, and technical support for a range of information services programs.	\$481	\$0	\$481	\$0			\$0	\$0						
41	4.05	Cross Check Insurance Expense	Adjusts actual test period insurance expense related to the utility for general liability, directors and officers ("D&O") liability, and property to reflect the expected 2017 level of insurance.	\$23	\$0	\$23	\$0			\$0	\$0						
42	4.06	Cross Check Property Tax Expense	Restates the pro forma level of property tax expense included in Pro Forma Property Tax Adjustment (3.04), to property tax levels expected during the 2017 rate period, based on property values expected as of December 31, 2016.	\$270	\$0	\$219	\$0			\$0	\$0						
	4.07	Cross Check Employee Benefits	This adjustment reflects updates to reflect actual medical claims expense for 2016 and the most recent medical premium cost estimate for 2017 received from our medical underwriter	\$0	\$0	\$257	\$0										
43	4.08	Reconcile 2017 Cross Check to Attrition	Represents the difference between the 2017 Cross Check Study and the Attrition Study.	(\$1,990)	(\$7,520)	\$802	(\$3,836)			\$0	\$0						
44	4.08	Staff Proposed Attrition Allowance	Represents the difference between Staff's attrition studies and Staff's modified historical test year.							\$5,478	\$18,730						
			Rounding (immaterial)	\$6						\$2							
45			<b>Revenue Requirement</b>	<b>\$4,397</b>	<b>\$298,315</b>	<b>\$7,926</b>	<b>\$303,250</b>	<b>\$0</b>	<b>\$0</b>	<b>\$2,143</b>	<b>\$298,125</b>						
<b>2018 CROSS CHECK STUDY</b>																	
46		The following adjustments begin the 2018 Cross Check adjustments included by the Company to include additional expenses and plant additions beyond the 2017 Cross Check Study identified by the Company for the (Jan-Jun) 2018 rate period.															

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				\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands			\$'s in Thousands	
47	18.01	Cross Check Labor Non-Exec	Reflects the incremental labor expense associated with the March 2018 union and non-union labor increase expected for the period March 1 – through June 30, 2018.	\$242	\$0	\$242	\$0			\$0	\$0					
48	18.02	Cross Check Regulatory Amortizations	Reduces regulatory amortization expense to reflect expiration of the two-year (2016-2017) 2015 Project Compass amortization at the end of 2017, removing 6-months of the amortization expense during the 6-month period ending June 30, 2018. (See related adjustments (2.15) and (3.07) above.)	(\$566)	\$0	(\$566)	\$0			\$0	\$0					
49	18.03	Cross Check Insurance Expense	Adjusts 2017 insurance expense levels related to the utility for general liability, D&O liability, and property included in Adjustment 4.05 "Cross Check Insurance Expense," reflecting the incremental 6-month January through June 2018 level of insurance expense. This adjustment excludes the 10% portion of D&O insurance associated with non-utility.	\$20	\$0	\$20	\$0			\$0	\$0					
50	18.04	Cross Check Information Tech/Service Expense	Includes the incremental costs associated with software development, application licenses, maintenance fees, and technical support for a range of information services programs beyond 2017 for the period January through June 2018.	\$107	\$0	\$107	\$0			\$0	\$0					
51	18.05	Cross Check Planned Capital Additions 2018 AMA	Reflects the additional 2018 capital additions together with the associated A/D and ADFIT for the 6-month period January through June 2018, on an AMA basis. This adjustment also includes associated depreciation expense for the incremental 6-month period January to June 2018 on these capital additions. In addition, this adjustment adjusts total plant and associated A/D and ADFIT for 2017 AMA to January to June 2018 AMA.	\$648	(\$2,036)	\$739	(\$1,397)			\$0	\$0					
52	18.06	Cross Check 2018 AMI Capital & Expense	Reflects the January through June of 2018 plant-in-service additions, and associated A/D and ADFIT on an AMA basis related to the Company's planned investment in its Advanced Metering Infrastructure (AMI) project for this incremental 6-month period. This adjustment also includes the associated depreciation expense for these additions.	\$1,744	\$7,649	\$1,767	\$6,053	<p><b>Joint proposal with The Energy Project. Decline to approve AMI proposal at this time because expenses have not been fully developed, costs are not known and measurable, the project is not used and useful, benefits have not been proven, and the project has not been shown to be prudent or cost effective.</b></p>		\$0	\$0					

DOCKETS UE-160228 & UG-160229  
 JOINT ISSUES LIST - NATURAL GAS  
 November 7, 2016

1	Adj.	ISSUE	DESCRIPTION	AVISTA - AS FILED		AVISTA - REBUTTAL		PUBLIC COUNSEL (A)		COMMISSION STAFF		NWIGU			THE ENERGY PROJECT
				Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	NOI	Rate Base	Rev. Req.
				\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands			
53	18.07	Reconcile 2018 Cross Check to Attrition	Represents the difference between the 2018 Cross Check Study and the Attrition Study.	(\$1,253)	(\$1,069)	(\$773)	\$1,301			\$0	\$0				
54			Rounding (immaterial)	(\$1)											
55			Revenue Requirement	\$ 5,338	\$ 302,859	\$ 9,462	\$ 309,207			\$ 2,143	\$ 298,125				
56			Incremental 2018 Attrition/Cross Check Total	\$ 941	\$ 4,544	\$ 1,536	\$ 5,957			\$ -	\$ -				
57															
58				AVISTA		COMMISSION STAFF		PUBLIC COUNSEL		COMMISSION STAFF		NWIGU			THE ENERGY PROJECT
59															
60		<b>COST OF CAPITAL</b>													
61		Cost of Capital - Return on Equity		9.90%		9.90%				9.20%				NWIGU Supports ICNU and Staff	
62		Cost of Capital - Cost of Debt		5.51%		5.59%				5.51%				NWIGU Supports ICNU and Staff	
63		Cost of Capital - Capital Structure		48.5		48.5				48.5				NWIGU Supports ICNU and Staff	
64		Rate of Return		7.64%		7.68%				7.30%				NWIGU Supports ICNU and Staff	
65															
66															
67		<b>COST OF SERVICE/RATE SPREAD/RATE DESIGN</b>													
68		Rate Spread		25% Movement towards Unity		25% Movement towards Unity				Uniform % Rate increase across all schedules				Make corrections to cost of service study and move classes closer to unity, which results in an increase to Schedule	
69		Rate Design - Schedule 101		<ul style="list-style-type: none"> <li>Basic Charge to \$9.50/month in 2017, no change 2018</li> <li>Uniform percentage to Blocks 1 and 2</li> </ul>		<ul style="list-style-type: none"> <li>Basic Charge to \$9.50/month in 2017, no change 2018</li> <li>Uniform percentage to Blocks 1 and 2</li> </ul>			No Change to Basic Charges  Support Company Proposed Changes to Minimum Charges and Demand Charges				<b>Increase Schedule 101 to 1.5 times system average</b>		
70		Rate Design - Schedule 111		<ul style="list-style-type: none"> <li>Increase Minimum Charge based on Schedule 101 Basic &amp; Volumetric Changes in 2017 and 2018</li> <li>Reduce Volumetric Rates for net 0.0% to the schedule</li> </ul>		<ul style="list-style-type: none"> <li>Increase Minimum Charge based on Schedule 101 Basic &amp; Volumetric Changes in 2017 and 2018</li> <li>Reduce Volumetric Rates for net 0.0% to the schedule</li> </ul>							<b>Maintained at current level based on corrected cost of service study.</b>		
71		Rate Design - Schedule 121		<ul style="list-style-type: none"> <li>Increase Minimum Charge based on Schedule 101 Basic &amp; Volumetric Changes in 2017 and 2018</li> <li>Reduce Volumetric Rates for net 0.0% to the schedule</li> </ul>		<ul style="list-style-type: none"> <li>Increase Minimum Charge based on Schedule 101 Basic &amp; Volumetric Changes in 2017 and 2018</li> <li>Reduce Volumetric Rates for net 0.0% to the schedule</li> </ul>							<b>Maintained at current level based on corrected cost of service study.</b>		
72		Rate Design - Schedule 131		Uniform percentage to the first three blocks		Uniform percentage to the first three blocks								<b>Maintained at current level based on corrected cost of service study.</b>	

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 JOINT ISSUES LIST - NATURAL GAS  
 November 7, 2016

1	Adj.	ISSUE	DESCRIPTION	AVISTA - AS FILED		AVISTA - REBUTTAL		PUBLIC COUNSEL (A)		COMMISSION STAFF		NWIGU			THE ENERGY PROJECT	
				Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	Rate Base	Rev. Req.	NOI	Rate Base	Rev. Req.	Rate Base
				\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands		\$'s in Thousands			\$'s in Thousands	
73		Rate Design - Schedule 146		<ul style="list-style-type: none"> <li>Increase Minimum Demand from \$525 to \$550</li> <li>Remaining to blocks on uniform percentage basis</li> </ul>	<ul style="list-style-type: none"> <li>Increase Minimum Demand from \$525 to \$550</li> <li>Remaining to blocks on uniform percentage basis</li> </ul>							Maintained at current level based on corrected cost of service study.				
74		<b>OTHER ISSUES</b>														
75		Generic Cost of Service Proceeding								Implement a Generic Cost of Service Proceeding to review and evaluate numerous issues on cost of service methodology in Washington						
76		Multiple rate increases		Yes		Yes				No						
		New Natural Gas Transportation Rate Schedule				No						NWIGU other rate design issue-- Create new transportation rate schedule with 35,000 therm per year minimum threshold.				
77		Advance Metering Infrastructure Proposal				If the Commission does not include recovery of the AMI costs for the rate period, as proposed by the Company in this case, the unique circumstances surrounding Advanced Metering Infrastructure (AMI) may warrant deferred accounting treatment as a solution to address the concerns expressed by parties in this case, and would also meet the needs of the Company.				Joint proposal with The Energy Project. Decline to approve AMI proposal at this time because expenses have not been fully developed, costs are not known and measurable, the project is not used and useful, benefits have not been proven, and the project has not been shown to be prudent or cost effective.						
78		(A) Public Counsel Column includes positions for which Public Counsel is Neutral in its Direct Testimony. For items that parties are neutral in direct, parties may adopt, support, or oppose other parties' positions and develop a recommendation in later stages of this proceeding, including on brief. This issues list does not include positions that may be taken in rebuttal or cross-answering testimony.														