



Bob Ferguson

## ATTORNEY GENERAL OF WASHINGTON

Utilities and Transportation Division

1400 S Evergreen Park Drive SW • PO Box 40128 • Olympia WA 98504-0128 • (360) 664-1183

*Via Electronic and United States Mail*

April 10, 2015

Steven V. King, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S Evergreen Park Dr. SW  
P.O. Box 47250  
Olympia, Washington 98504-7250

RE: *Avista Corporation 2015 General Rate Case*  
Dockets UE-150204/UG-150205

Dear Mr. King:

The Commission recently notified the parties of an attrition discussion workshop that will take place on April 16, 2015. In advance of the workshop, enclosed for filing in the above-referenced dockets are the original and six copies of Staff's Summary of All Parties' Comments, and Certificate of Service.

Sincerely,

BRETT P. SHEARER  
Assistant Attorney General

BPS/emd  
Enclosures  
cc: Parties w/enc.

	"Modified" historical test yr	Reason	Attrition Allowance	Reason	Future test year	Reason	Other mechanisms
Public Counsel	Yes	Rates based on actual, verifiable, auditable, known and measurable costs	No	Subjective, ambiguous, and difficult to verify; substantial reliance on projections; negative effect on management's incentive to control costs			EoP rate base, ERF
ICNU	Yes	Rates based on known and measurable costs	No	Neither known and measurable, nor subject to full review in a regulatory proceeding; Self-fulfilling cycle that promotes continued spending to sustain trends; Commission would allow the company to earn a return on capital expenditures that have not been determined to be prudent	No	Similar to an attrition allowance, a future test year would be based on projections of costs that are not known and measurable such as budgets, which are highly discretionary	
Commission Staff	Yes	Known and measurable costs; Closer alignment of test year plant balances and rate year plant balances	Yes	Matching principle maintenance; simpler analysis; all necessary data available at the time of filing;	No	Does not meet the known and measurable standard; speculative; may be prohibited by rule	CWIP

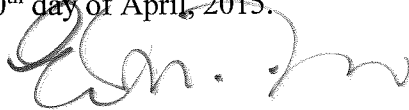
"Modified" historical test yr	Reason	Attrition Allowance	Reason	Future test year	Reason	Other mechanisms
NWIGU	<p>Rates based on actual and verifiable costs; establishes rates no higher than what is necessary; provides economic incentive for utility managers to aggressively manage costs; regulatory lag</p> <p>symmetrically impacts both the utility and its customers</p>	No	<p>Projected costs are uncertain and not known and measurable. Introduces costs which do not meet the normal standard to ensure rates reflect only reasonable and prudent costs of service. Can erode management's economic incentive to aggressively manage costs. Can skew the practice of setting just and reasonable rates; will tilt the current balanced treatment for investors and customers in favor of investors which is unnecessary and unjust.</p>	No	<p>Rates based on budgeted amounts which are necessarily speculative</p>	EoP rate base
PacifiCorp	<p>Does not adequately address regulatory lag</p>			Yes	<p>Rates set at a level representative of the costs expected during the rate year</p>	Adjustment mechanisms or tariff riders outside of a GRC for major capital additions; PCA
NW Natural	<p>The utility cannot catch up to systematic increases of existing costs caused by inflation when revenue recovery commensurate with new rates reflects costs that occurred more than a year previously</p>			Yes	<p>Accounts for systematic increases in existing costs; would merely broaden the use of different methods of normalization</p>	

	"Modified" historical test yr	Reason	Attrition Allowance	Reason	Future test year	Reason	Other mechanisms
PSE	No	Has not provided for adequate and timely recovery of costs. The Commission's narrowed use of these adjustments have greatly diminished their value in addressing earnings attrition.	Yes; "K-factor" adjustment	The k-factor provides pre-determined increases to authorized revenue per customer that helps to address earnings attrition, which when combined with the stay-out period provides further incentive for the company to manage its costs and seek efficiencies.			decoupling; ERF; PCA; PCORC; trackers; riders; forecasted test year
Avista	No	During times when capital investment is growing at a much faster pace than retail sales revenues, ratemaking practices using historical test periods with limited pro forma adjustments do not provide for adequate and timely recovery of costs or the opportunity to earn a reasonable return.	Yes	Adheres to the matching principle; properly matches revenues, expenses and rate base during the rate effective period	Yes	With precautionary steps to ensure costs included in rates are representative of actual costs) (e.g. tracking mechanisms or a true-up)	Allow recovery of all non-revenue generating investments within the Pipeline Replacement CRM
Cascade	No	In periods of high investment without supporting growth in revenues, historical ratemaking results in virtually no chance of achieving an authorized rate of return					

Docket UE-150204/UG-150205  
CERTIFICATE OF SERVICE

I hereby certify that I have this day served the attached Comments Matrix upon the persons and entities listed on the Service List below via e-mail and by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 10<sup>th</sup> day of April, 2015.



ELIZABETH M. DeMARCO

***For Avista:***

Kelly Norwood  
David Meyer  
Avista Corporation, d/b/a Avista Utilities  
1411 E. Mission, MSC-27  
Spokane, WA 99220-3727  
Tel: (509) 495-4267  
[kelly.norwood@avistacorp.com](mailto:kelly.norwood@avistacorp.com)  
[david.meyer@avistacorp.com](mailto:david.meyer@avistacorp.com)  
[patrick.ehrbar@avistacorp.com](mailto:patrick.ehrbar@avistacorp.com)  
[avistadockets@avistacorp.com](mailto:avistadockets@avistacorp.com)  
[liz.andrews@avistacorp.com](mailto:liz.andrews@avistacorp.com)

***For Public Counsel:***

Lisa W. Gafken  
Office of the Attorney General  
800 Fifth Avenue Suite 2000  
Seattle, WA 98104-3188  
Tel: (206) 389-2055  
[lisa4w@atg.wa.gov](mailto:lisa4w@atg.wa.gov)  
[lead@atg.wa.gov](mailto:lead@atg.wa.gov)  
[carolw@atg.wa.gov](mailto:carolw@atg.wa.gov)  
[chandam@atg.wa.gov](mailto:chandam@atg.wa.gov)  
[stefaniej@atg.wa.gov](mailto:stefaniej@atg.wa.gov)

***For The Energy Project:***

Ronald L. Roseman  
2011 14<sup>th</sup> Avenue East  
Seattle, WA 98112  
Tel: (206) 324-8792  
[ronaldroseman@comcast.net](mailto:ronaldroseman@comcast.net)  
[chuck\\_eberdt@oppco.org](mailto:chuck_eberdt@oppco.org)  
[shawn\\_collins@oppco.org](mailto:shawn_collins@oppco.org)  
[michael@awish.net](mailto:michael@awish.net)

***For NWIGU:***

Chad M. Stokes  
Tommy A. Brooks  
Cable Huston LLP  
1001 SW Fifth Avenue, Suite 2000  
Portland, OR 97204-1136  
Tel: (503) 224-3092  
[cstokes@cablehuston.com](mailto:cstokes@cablehuston.com)  
[tbrooks@cablehuston.com](mailto:tbrooks@cablehuston.com)  
[efinklea@nwigu.org](mailto:efinklea@nwigu.org)

***For ICNU:***

Melinda J. Davison  
Jesse E. Cowell  
333 S.W. Taylor, Suite 400  
Portland, Oregon 97204  
Tel: (503) 241-7242  
[mjd@dvclaw.com](mailto:mjd@dvclaw.com)  
[jec@dvclaw.com](mailto:jec@dvclaw.com)  
[jog@dvclaw.com](mailto:jog@dvclaw.com)  
[mgorman@consultbai.com](mailto:mgorman@consultbai.com)  
[brmullins@mwanalytics.com](mailto:brmullins@mwanalytics.com)