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Avista Corp.

1411 East Mission P.O. Box 3727 Spokane. Washington 99220-0500 Telephone 509-489-0500 Toll Free 800-727-9170

VIA ELECTRONIC MAIL

April 25, 2022

Amanda Maxwell
Executive Director & Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, Washington 98503

RE: Avista Utilities 2021 Natural Gas Commission Basis Report Pursuant to

WAC 480-090-257

Dear Ms. Maxwell:

Enclosed for filing is an electronic copy of Avista Utilities 2021 Natural Gas Commission Basis Report. The original and two copies are being provided via overnight mail. The Company's report is being filed pursuant to WAC 480-090-257 and is based on the period of twelve months ended December 31, 2021. This report is being supplied for informational purposes only.

If you have any questions, please contact me at (509) 495-8601.

Sincerely,

/s/ Elizabeth Andrews

Elizabeth Andrews Senior Manager, Revenue Requirements Enclosure

Washington Gas (000's OF DOLLARS)

TWELVE MONTHS ENDED DECEMBER 31, 2021

			Washington Gas			
Column	WP Ref	Description	NOI	Rate Base	ROR	
Restating A	djustments					
1.00	G-ROO	Per Results Report	\$29,329	\$452,956		
1.01	G-DFIT	Deferred FIT Rate Base	1	282		
1.02	G-DDC	Deferred Debits and Credits	0	0		
1.03	G-WC	Working Capital	(0)	(76)		
1.04	G-AMI	Remove AMI Rate Base	(80)	(15,221)		
2.01	G-EBO	Eliminate B & O Taxes	1	0		
2.02	G-RPT	Restate Property Tax	0	0		
2.03	G-UE	Uncollectible Expense	419	0		
2.04	G-RE	Regulatory Expense	(8)	0		
2.05	G-ID	Injuries & Damages	40	0		
2.06	G-FIT	FIT / DFIT Expense	0	0		
2.07	G-OSC	Office Space Charges to Non-Utility	8	0		
2.08	G-RET	Restate Excise Taxes	(6)	0		
2.09	G-NGL	Net Gains & Losses	9	0		
2.10	G-WNGC	Weather Normalization / Gas Cost Adjust	6	0		
2.11	G-EAS	Eliminate Adder Schedules	809	0		
2.12	G-MR	Misc. Restating Non-Util / Non- Recurring Expense	375	0		
2.13	G-RI	Restating Incentives Expense	246	0		
2.14	G-DI	Restate Debt Interest	(48)	0		
		Restated Total	\$31,100	\$437,941	7.10%	

Other CF WA Gas Conversion Factor

WASHINGTON NATURAL GAS

RESTATEMENT ADJUSTMENTS

TWELVE MONTHS ENDED DECEMBER 31, 2021

(000'S OF DOLLARS)

ACTUAL RESULTS

Part	(000'S	OF DOLLARS)	RESULTS								
Manument	Line					_				Uncollectible Expense	Regulatory Expense
Server S	No.										-
Transportation											
1 Total Control Bosines		Workpaper Reference	G-ROO	G-DFIT	G-DDC	G-WC	G-AMI	G-EBO	G-RPT	G-UE	G-RE
2 Other Revenues		REVENUES									
1	1			\$ -	\$ -	\$ -	\$ -			- \$ -	\$ -
EMPLIANCE 1974 1975 19	2	-		-	-	-	-	(124)	-	-	-
Production Exportance				_	_	_	-	-	-	_	_
Production Expenses 102,184	4	Total Gas Revenues	219,749	-	-	-	-	(5,603)	-	-	-
Production Expenses 102,184		EXPENSES									
Purchased Sax Expenses											
Name Note Storage Trans	5	City Gate Purchases	102,184	-	-	_	-	-	-	-	-
Total Production	6			-	-	-	-	-	-	-	-
Underground Storage 1 Operating Progresses 1,847				_	_	_	-	-	-	-	
9 Openting Exposes	8	Total Production	98,326	-	-	-	-	-	-	-	-
9 Openting Exposes		Underground Storage									
Depreciation Amortization	9		1.847	_	_	_	_	_	_	<u>-</u>	_
1 Taxes				_	_	_	-	_	-	_	_
Distribution	11	_	176	-	-	-	-	-	-	-	-
13 Operating Expenses 11,456	12	Total Underground Storage	2,494	_	-	_	-	-	-	-	-
13 Operating Expenses 11,456		D' - 1 - 2									
14 Depreciation/mutriation 14.43	12		11.456								
Takes				-	-	-	-	-	-	-	-
Total Distribution				-	_	_	-	(5.604)	_	- -	_
Customer Accounting S,118											
National Service & Information 9,262	10	Total Distribution	41,200					(3,004)			
Administrative & General	17	Customer Accounting	5,118	_	-	_	-	-		(531)	_
Administrative & General	18	Customer Service & Information	9,262	-	-	_	-	-	-	-	-
Operating Expenses 21,326	19	Sales Expenses	-	-	-	-	-	-	-	-	-
Operating Expenses 21,326		Administrative & General									
1	20		21 326	_	_	_	_	_	_	_	10
Regulatory Amoritanions				_	_	_	_	_	-		-
Total Admin. & General Final Fi											
Total Gas Expense 190,038	23			-	-	-	-	-	-	-	_
PEDERAL INCOME BEFORE FIT 29.711	24	Total Admin. & General	33,638	_	-	_	-	-	-	-	10
PEDERAL INCOME BEFORE FIT 29.71	25	Total Gas Expense	190,038	-	_	_	-	(5,604)	-	(531)	10
FEDERAL INCOME TAX Current Accrual (3.285) -	26	ODED ATING INCOME REPORT FIT	20.711					1		531	(10)
Current Accrual C3,285	20		27,711	_	_	_	_	1		331	(10)
Definiteness											
Deferred FIT 3,667			(3,285)	-	-	-	-	0	-	112	(2)
Amort ITC NET OPERATING INCOME \$ 29,329 \$ 1 \$ - \$ (0) \$ (80) \$ 1 \$ - \$ \$ 419 \$ (8)			2.667	(1)	-	0	80	-	-	-	-
NET OPERATING INCOME \$ 29,329 \$ 1 \$ 0 \$ 0 \$ 00 \$ 080 \$ 1 \$ 0 \$ 0 \$ 080 \$ 0 \$ 0 \$ 0 \$ 0 \$ 0 \$ 0 \$				-	-	-	-	-	-	-	-
RATE BASE PLANT IN SERVICE 32	30	Amontine								-	
PLANT IN SERVICE	31	NET OPERATING INCOME	\$ 29,329	\$ 1	\$ -	\$ (0)) \$ (80)	\$ 1	\$ -	\$ 419	\$ (8)
PLANT IN SERVICE		RATERASE									
Second Storage Seco											
33 Distribution Plant 580,586 - - (28,850) - - - - -	32		\$ 32,489	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	- \$ -	\$ -
Total Plant in Service T72,373 Total Plant in				-	-	-			_	· -	_
ACCUMULATED DEPRECIATION/AMORT 36	34	General Plant	159,298	-	-	-			-	-	-
ACCUMULATED DEPRECIATION/AMORT 36	35	Total Plant in Service	772,373	_	_	_	(28,850)	-	-	_	_
Underground Storage		ACCUMUL ATED DEPRECIATION/AMORT									
Distribution Plant (165,317) - - 5,946 - - - - - - - - -	36		(12.393)	_	_	_	_	_	_	_	_
Total Accumulated Depreciation/Amortization C31,914 -					-	_	5,946	-	-		_
39 Total Accumulated Depreciation/Amortization (231,914) - - - 5,946 -					-	_		-	_	_	_
41 DEFERRED TAXES (92,650) 282 - - 4,453 - <td< td=""><td></td><td>Total Accumulated Depreciation/Amortization</td><td></td><td>-</td><td>-</td><td>-</td><td>5,946</td><td>-</td><td>-</td><td>-</td><td>-</td></td<>		Total Accumulated Depreciation/Amortization		-	-	-	5,946	-	-	-	-
42 Net Plant After DFIT 447,809 282 - - (18,451) - - - - 43 GAS INVENTORY 13,249 - <td>40</td> <td></td> <td>540,459</td> <td>-</td> <td>-</td> <td>-</td> <td>(22,904)</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td>	40		540,459	-	-	-	(22,904)	-	-	-	-
43 GAS INVENTORY 13,249 -	41	DEFERRED TAXES	(92,650)	282						<u> </u>	
43 GAS INVENTORY 13,249 -	40	Not Plant After DEIT	117 900								
44 GAIN ON SALE OF BUILDING -<				282	-		(10,431)	-	-	-	-
45 OTHER 46 WORKING CAPITAL 2,256 (76)				-	-		-	-	-	- -	-
46 WORKING CAPITAL 2,256 (76)					_	_	3.230				_
47 TOTAL RATE BASE \$ 452,956 \$ 282 \$ - \$ (76) \$ (15,221) \$ - \$ - \$ - \$ -				-	-	(76)		-	-	-	-
				_			_	_	_		
48 RATE OF RETURN 6.48%	47	TOTAL RATE BASE	\$ 452,956	\$ 282	\$	\$ (76)) \$ (15,221)	\$	\$	\$ <u>-</u>	\$ -
	48	RATE OF RETURN	6.48%								

AVISTA UTILITIES
WASHINGTON NATURAL GAS
TWELVE MONTHS ENDED DECEMBER 31, 2021
(000'S OF DOLLARS)

Line No.	DESCRIPTION	Injuries & Damages	FIT / DFIT Expense	Office Space Charges to Non-Utility	Restate Excise Taxes	Net Gains & Losses	Weather Normalization / Gas Cost Adjust	Eliminate Adder Schedules	Misc. Restating Non-Util / Non- Recurring Expense
	Adjsutment Number Workpaper Reference	2.05 G-ID	2.06 G-FIT	2.07 G-OSC	2.08 G-RET	2.09 G-NGL	2.10 G-WNGC	2.11 G-EAS	2.12 G-MR
	REVENUES								-
1	Total General Business	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 7,763	\$ (5,681	
2 3	Total Transportation Other Revenues	-	-	-	-	-	(4,486)	(45,318	-
4	Total Gas Revenues					<u> </u>	3,277	(50,999	
	EXPENSES						,	, ,	•
	Production Expenses								
5	City Gate Purchases	-	-	-	-	-	2,934	(51,889	-
6 7	Purchased Gas Expense Net Nat Gas Storage Trans	-	-	-	-	-	5	4,691	-
8	Total Production		<u> </u>	-			2,939	(47,198) -
							,	, ,	•
9	Underground Storage Operating Expenses	_	_	_	_	_	_	_	_
10	Depreciation/Amortization	-	-	-	-	-	-	-	-
11	Taxes		_		-	_	-		_
12	Total Underground Storage	-	-	-	-	-	-	-	-
	Distribution								
13 14	Operating Expenses	-	-	-	-	- /11\	-	-	(13)
14	Depreciation/Amortization Taxes	-	-	-	8	(11)	298	(218	-) -
16	Total Distribution	_	-	-	8			(218	
1.7	Catalogue						17	(12	\ \
17 18	Customer Accounting Customer Service & Information	-	-	-	-	-	17	(12 (8,582	
19	Sales Expenses	-	-	-	-	-	-	-	-
	Administrative & General								
20	Operating Expenses	(50)	-	(10) -	-	16	(11	(462)
21	Depreciation/Amortization	-	-	-	-	-			-
22 23	Regulatory Amortizations Taxes	_	_	_	_	_	-	1,388	-
24	Total Admin. & General	(50)		(10)			16	1,377	(462)
25	Total Gas Expense	(50)	-	(10) 8	(11)	3,270	(54,633) (475)
26	OPERATING INCOME BEFORE FIT	50	-	10	(8) 11	7	3,634	475
	FEDERAL INCOME TAX								
27	Current Accrual	11	-	2	(2) 2	1	763	100
28	Debt Interest	-		-	-	-	-	-	-
29 30	Deferred FIT Amort ITC	-	-	-	-	-	-	2,062	-
			_						
31	NET OPERATING INCOME	\$ 40	\$ -	\$ 8	\$ (6	9	\$ 6	\$ 809	\$ 375
	RATE BASE PLANT IN SERVICE								
32	Underground Storage	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
33	Distribution Plant	-	Ψ -	-	Ψ -	-	-	-	-
34	General Plant		-			-	-		
35	Total Plant in Service	-	-	-	-	-	-	-	-
2-	ACCUMULATED DEPRECIATION/AMORT								
36 37	Underground Storage Distribution Plant	-	-	<u>-</u> -	-	- -	-	-	-
38	General Plant	-	-	-	-	-	-	-	-
39	Total Accumulated Depreciation/Amortization		-	-	-	-	-	-	-
40	NET PLANT	-	-	-	-	-	-	-	-
41	DEFERRED TAXES		-	-		-	-	-	
42	Net Plant After DFIT	-	-	-	-	-	-	-	-
43 44	GAS INVENTORY GAIN ON SALE OF BUILDING	-	-	-	-	-	- -	-	-
45	OTHER								
46	WORKING CAPITAL		-	-		_	-		
47	TOTAL RATE BASE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	s -	\$ -
7/	RATE OF RETURN	Ψ	Ψ	Ψ	Ψ	Ψ	Ψ •	Ψ -	Ψ -

AVISTA UTILITIES WASHINGTON NATURAL GAS TWELVE MONTHS ENDED DECEMBER 31, 2021 (000'S OF DOLLARS)

(0000	OF DOLLARS)	Double Con-	D4 - 4 -	D 4 . 4 . 1
Line		Restating Incentives	Restate Debt	Restated TOTAL
No.	DESCRIPTION	Expense	Interest	TOTAL
1,00	Adjsutment Number	2.13	2.14	<u> </u>
	Workpaper Reference	G-RI	G-DI	R-Ttl
	REVENUES			
1	Total General Business	\$ -	\$ -	\$ 156,824
2	Total Transportation	Ψ -	Ψ -	4,758
3	Other Revenues	_	_	4,842
4	Total Gas Revenues	_	-	166,424
				ŕ
	EXPENSES Description Francisco			
5	Production Expenses			52 220
5 6	City Gate Purchases Purchased Gas Expense	-	-	53,229 838
7	Net Nat Gas Storage Trans	_	_	-
8	Total Production			54,067
Ü	10001100000000			2 1,007
	Underground Storage			
9	Operating Expenses	-	-	1,847
10	Depreciation/Amortization	-	-	471
11	Taxes		-	176
12	Total Underground Storage	-	-	2,494
	Distribution			
13	Operating Expenses	_	-	11,443
14	Depreciation/Amortization	-	-	14,632
15	Taxes		-	9,585
16	Total Distribution	-	-	35,660
17	Customer Accounting	-	-	4,592
18	Customer Service & Information	-	-	680
19	Sales Expenses	-	-	-
	Administrative & General			-
20	Operating Expenses	(312)	-	20,507
21	Depreciation/Amortization	-	-	12,552
22	Regulatory Amortizations	-	-	(32)
23	Taxes		-	1,180
24	Total Admin. & General	(312)	-	34,207
25	Total Gas Expense	(312)	-	131,700
				,
26	OPERATING INCOME BEFORE FIT	312	-	34,724
	FEDERAL INCOME TAX			
27	Current Accrual	66	48	(2,184)
28	Debt Interest	-		79
29	Deferred FIT	-	-	3,667
30	Amort ITC		-	2,062
31	NET OPERATING INCOME	\$ 246	\$ (48)	\$ 31,100
31	NET OF EXATING INCOME	φ 240	ψ (40)	φ 31,100
	RATE BASE			
	PLANT IN SERVICE		_	
32	Underground Storage	\$ -	\$ -	\$ 32,489
33 34	Distribution Plant General Plant	-	-	551,736 159,298
35	Total Plant in Service	-	-	743,523
	ACCUMULATED DEPRECIATION/AMORT			
36	Underground Storage	-	-	(12,393)
37	Distribution Plant	-	-	(159,371)
38 39	General Plant			(54,204)
40	Total Accumulated Depreciation/Amortization NET PLANT		<u>-</u>	(225,968) 517,555
		-	-	
41	DEFERRED TAXES		-	(87,915)
42	Net Plant After DFIT	-	-	429,640
43	GAS INVENTORY	-	-	13,249
44	GAIN ON SALE OF BUILDING	-	-	-
45	OTHER			(7,128)
46	WORKING CAPITAL		-	2,180
45	TOTAL DATE DAGE	¢	¢	¢ 425.044
47	TOTAL RATE BASE	\$ -	\$ -	\$ 437,941
48	RATE OF RETURN			

AVISTA UTILITIES ACTUAL COST OF CAPITAL WASHINGTON NATURAL GAS DECEMBER 31, 2021

Proposed Capital Structure

Component	Capital Structure	Cost	Weighted Cost
Debt	52.44%	4.78%	2.51%
Common	47.56%	9.40%	4.47%
Total	100.00%	_	6.98%

AVISTA UTILITIES REVENUE CONVERSION FACTOR WASHINGTON NATURAL GAS DECEMBER 31, 2021

Line No.	Description	Factor
1	Revenues	1.000000
	Expense:	
2	Uncollectibles	0.002152
3	Commission Fees	0.002000
4	Washington Excise Tax	0.038437
6	Total Expense	0.042589
7	Net Operating Income Before FIT	0.957411
8	Federal Income Tax @ 21%	0.201056
9	REVENUE CONVERSION FACTOR	0.756354

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2021

1.00 Per Results of Operation (ROO) Report

ROO Report amounts are for the twelve months ended December 31, 2021. Amounts agree to the Company's financial general ledger records with the removal of certain prior period costs. Rate base was computed using the average-of-monthly-averages method. Rate base includes all rate base components, including net plant (costs, less accumulated depreciation, net of ADFIT), working capital, all other regulatory deferred debits and credits and natural gas inventory.

1.01 Accumulated Deferred FIT (ADFIT) Rate Base

ADFIT arises from accelerated tax depreciation in excess of book depreciation, bond refinancing premiums, and contributions in aid of construction. ADFIT that was included in ROO report were included in column (1.00). The adjustment was necessary to adjust the ROO balances to actual. The primary difference between ADFIT per ROO and the Commission Basis amounts relates to the allocation of common ADFIT amounts.

1.02 Deferred Debits and Credits

Deferred debits and credits that were included in the ROO Reports were included in column 1.00. This adjustment corrects the amounts as shown in ROO Reports. The Deferred Debits and Credits include the following regulatory deferrals:

• Customer Advances

These amounts decrease rate base for customer advances, as they will most likely be recorded as contributions in aid of construction at some future time. These amounts are a component of actual ROO. The ROO rate base liability was properly stated, therefore, no adjustment was needed.

• Customer Deposits

These amounts decrease rate base for the average-of-monthly averages of customer deposits held by the Company. The ROO rate base balance is correct; therefore, no adjustment was made. The corresponding interest paid on customer deposits is reclassified to an operating expense, at the UTC interest rate during 2021 of .01%. This adjustment is consistent with Docket No. UE-090134.

1.03 Working Capital

The working capital rate base balance reflected in ROO as of December 31, 2021 is calculated using the Investor Supplied Working Capital (ISWC) method using an average of monthly averages basis. This method is consistent with the method originally approved in the Company's natural gas general rate case, Docket No. UG-150205 and updated for minor changes approved in Docket Nos. UG-170486 and UG-190335. The actual ROO balance recorded in 2021 was adjusted to reflect the appropriate ISWC balance.

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2021

1.04 AMI Rate Base

This adjustment removes the net rate base of the Company's investment in AMI (Advanced Metering Infrastructure). In Docket Nos. UE-170327 and UG-170328, the Commission authorized the Company to defer the depreciation expense associated with this investment until such plant is included in retail rates in a future general rate case. The Company proposed and the Commission approved that Avista would not earn a return on this investment during the deferral period, therefore, the net rate base of this investment is removed for Commission Basis reporting until such time the investment is included in retail rates. AMI was removed for CBR purposes for the 2021 CBR period, however, AMI and its deferrals were approved for recovery in UE-200900 and UG-200901.

2.01 Eliminate B & O Taxes

This adjustment removes the revenues and expenses associated with local business and occupation taxes. The adjustment eliminates any timing mismatch that exists between the revenues and expenses by eliminating the revenues and expenses in their entirety. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward).

2.02 Restate Property Tax

This adjustment restates the test period accrued levels of property taxes to reflect the actual amounts. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward).

2.03 Uncollectible Expense

This adjustment restates the accrued expense to the actual level of net write-offs for the test period. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward). During 2021, the Company was authorized to defer the bad debt expense accrued that exceeded the level being collected from customers due to the COVID-19 deferral mechanism approved in Docket No. UG-200408. This deferral due to COVID-19 was removed from the accrual to determine the level of bad debt expense in 2021 for the CBR.

2.04 Regulatory Expenses

This adjustment restates regulatory expense to reflect the WUTC assessment rates applied to revenues for the test period. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward).

2.05 Injuries and Damages

As a result of the Commission's Order in Docket No. U-88-2380-T the Company changed to the reserve method of accounting for injuries and damages not covered by insurance. This

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2021

restating adjustment replaces the accrual with actuals to adjust to the six-year rolling average of injuries and damages payments not covered by insurance. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward).

2.06 FIT and DFIT Expenses

This adjustment adjusts the level of Schedule M items and jurisdictional allocation of Schedule M items as necessary to reflect the appropriate level of Washington natural gas FIT expense and DFIT expense. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward).

2.07 Office Space Charges to Subsidiaries

This adjustment removes a portion of the office space costs (including, but not limited to office building operating and fixed costs, utilities, administrative, security, HVAC, depreciation and property taxes, as well as other costs related to employee use of phones, laptops, etc.) using the percentage of labor dollars charged to subsidiary/non-utility activities by employee compared to total labor dollars by employee. These percentages are applied to the employees' office space (expressed in square feet) and multiplied by office space costs/per square foot. This restating adjustment is made as a result of the Commission's Third Supplemental Order in Docket No. U-88-2380-T, which required the company to perform a space utilization study to allocate costs to subsidiaries. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward).

2.08 Restate Excise/Franchise Taxes

This adjustment removes the effect of a one-month accrual lag in actual results to reflect the actual level of taxes paid. This restating adjustment is consistent with prior dockets (including Docket No. UG-991607 forward).

2.09 Net Gains/Losses

This adjustment reflects a ten-year amortization of net gains realized from the sale of real property disposed of between 2012 and 2021. This restating adjustment is made as a result of the Commission's Order in Docket No. UE-050842/UG-050483 and is consistent with Docket Nos. following UG-050483.

2.10 Weather Normalization/Gas Cost Adjustment

This 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. These restating adjustments are required per WAC 480-90-208.

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2021

2.11 Eliminate Adder Schedules

This adjustment removes the impact of the adder schedule revenues and related expenses, including Schedule 155 Gas Cost surcharge or rebate, Schedule 175 Decoupling surcharge or rebate, Schedules 189, 191 and 192 Public Purpose Tariff Riders (Senior Discount, DSM and LIRAP) and Schedule 194 2015 GRC Rate Credit, since these items are recovered/rebated by separate tariffs and, therefore, are not part of base rates. In addition, various accounts associated with the cost of gas managed through the PGA deferral mechanism are consolidated into City Gate Purchases in this adjustment.

2.12 Miscellaneous Restating

This adjustment removes a number of non-operating or non-utility expenses included in error in the test period actual results, and removes or restates other expenses incorrectly charged between service and or jurisdiction. The Company also removed 50% of director meeting expenses and director fees.

2.13 Restate Incentives

This adjustment restates O&M incentive compensation expense recorded in 2021 to reflect a six-year average of actual expense as approved in Docket Nos. UE-150204 and UG-150205.

2.14 Restate Debt Interest

This adjustment reflects debt interest using the Company's weighted average cost of debt, based on rate base as reported in column (1.00), resulting in the level of tax-deductible interest expense on actual test period rate base. For each Commission Basis adjustment to rate base, the FIT expense is reflected on that adjustment for the impact of the restated debt interest.