

**AVISTA CORP.
 RESPONSE TO REQUEST FOR INFORMATION**

JURISDICTION:	WASHINGTON	DATE PREPARED:	08/06/2021
CASE NO:	200900-901-894	WITNESS:	H. Rosentrater/E. Andrews
REQUESTER:	Bench	RESPONDER:	J. Pluth/L. Andrews
TYPE:	Bench Request	DEPT:	Regulatory Affairs
REQUEST NO.:	Bench Request No. 7	TELEPHONE:	(509) 495-2204
		EMAIL:	jeanne.pluth@avistacorp.com

REQUEST:

Please update actual advanced metering infrastructure (AMI) cost data through July 2021. Response must be filed with the Commission no later than 5 p.m. on Friday, August 13, 2021.

RESPONSE:

Please see “Bench Request 7 - Attachment A 2021 actual thru 07.31.2021” for the actual transfers to plant for AMI for the seven months ended July 31, 2021.

The Company had pro formed AMI electric capital for 2021 of \$1,687,308 in its rebuttal case. Actual electric transfers to plant for the seven-month ended July 31, 2021 was \$1,898,341. Since the actual transfers to plant exceeded the amount pro formed, the Company did not update its rebuttal position.

The Company had pro formed AMI natural gas capital for 2021 of \$680,406 in its rebuttal case. Actual natural gas transfers to plant for the seven-month ended July 31, 2021 was \$273,503. Since the actual transfers to plant were less than the amount pro formed by \$406,903, the Company updated its rebuttal position. By updating the natural gas AMI transfers to plant, the revenue requirement was reduced \$48,000. The Company has provided updated workpapers for this change as follows: “Bench Request 7 - Attachment B - 3.16 a) PF 2020 Capital AMI adjustment detail” and “Bench Request 7 - Attachment C - 3.16 b) PF 2020 Capital AMI adjustment detail”.

Finally, attachment “Bench Request 7 - Attachment D - Revised Exh. EMA-9 Gas Rebuttal Model with AMI” provides the Company’s REVISED Natural Gas Revenue requirement model as filed on rebuttal, updated to reflect this reduction in AMI natural gas transfers to plant. The revised revenue requirement model is provided for ease, to reflect the revised Natural Gas PF Adj. 3.16, and the revised revenue requirement of \$10,666,000, as shown in the table below.

Revised Revenue Requirement - Natural Gas	
Rebuttal Revenue Requirement ¹	\$ 10,714
Bench Request 7 - AMI Update	\$ (48)
Avista Revised Revenue Requirement ²	<u>\$ 10,666</u>
Base Rate Increase	10.14%
Billed Rate Increase (prior to Customer Tax Credit)	6.61%
¹ Per Exh. EMA-9, page 2, row 7.	
² Per Bench Request 7 - Attachment D, pg 3, row 7.	

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES
WASHINGTON NATURAL GAS
TWELVE MONTHS ENDED DECEMBER 31, 2019
(000'S OF DOLLARS)

[Updated with BR-7 AMI]

		October 1, 2021						WITH 10.01.2021 PROPOSED RATES	
Line No.	DESCRIPTION	WITH PRESENT RATES				WITH 10.01.2021 PROPOSED RATES			
		Actual Per Results Report	Total Restate Adjustments	Restated Results Total (1)	Total Pro Forma Adjustments	Pro Forma 10.2021 Adjusted Total (2)	Proposed Revenues & Related Exp	10.01.2021 Proposed Total	
	<i>a</i>	<i>b</i>	<i>l</i>	<i>2</i>	<i>c</i>	<i>d</i>	<i>e</i>	<i>f</i>	
REVENUES									
1	Total General Business	\$142,552	\$ (987)	\$141,565	\$ (41,734)	\$99,831	\$10,666	\$110,497	
2	Total Transportation	5,183	(131)	5,052	290	5,342		5,342	
3	Other Revenues	60,090	(58,323)	1,767	(1,153)	614		614	
4	Total Gas Revenues	207,825	(59,441)	148,384	(42,597)	105,787	10,666	116,453	
EXPENSES									
Production Expenses									
5	City Gate Purchases	100,541	(49,393)	51,148	(51,148)	0		0	
6	Purchased Gas Expense	959	(3)	956	41	997		997	
7	Net Nat Gas Storage Trans	(1,928)	1,928	-	-	-		-	
8	Total Production	99,572	(47,468)	52,104	(51,107)	998	-	998	
Underground Storage									
9	Operating Expenses	1,883	-	1,883	-	1,883		1,883	
10	Depreciation	494	(164)	330	21	351		351	
11	Taxes	323	(66)	257	9	266		266	
12	Total Underground Storage	2,700	(230)	2,470	30	2,500	-	2,500	
Distribution									
13	Operating Expenses	13,669	(2)	13,667	(353)	13,315		13,315	
14	Depreciation	12,469	(123)	12,346	1,149	13,494		13,494	
15	Taxes	13,739	(4,771)	8,968	(1,475)	7,493	409	7,902	
16	Total Distribution	39,877	(4,896)	34,981	(679)	34,302	409	34,711	
17	Customer Accounting	6,398	195	6,593	210	6,803	35	6,838	
18	Customer Service & Information	9,664	(8,484)	1,180	26	1,206		1,206	
19	Sales Expenses	-	-	-	-	-		-	
Administrative & General									
20	Operating Expenses	15,696	(192)	15,504	1,132	16,636	21	16,657	
21	Depreciation/Amortization	10,678	14	10,692	1,275	11,967		11,967	
22	Regulatory Amortizations	(3,003)	1,205	(1,798)	5,618	3,820		3,820	
23	Taxes	-	-	-	-	-		-	
24	Total Admin. & General	23,371	1,027	24,398	8,026	32,423	21	32,444	
25	Total Gas Expense	181,582	(59,856)	121,726	(43,494)	78,232	465	78,697	
26	OPERATING INCOME BEFORE FIT	26,243	415	26,658	897	27,555	10,201	37,756	
FEDERAL INCOME TAX									
27	Current Accrual	(4,720)	309	(4,411)	188	(4,222)	2,142	(2,080)	
28	Debt Interest	-	41	41	(228)	(187)		(187)	
29	Deferred FIT	6,501	704	7,205	(5)	7,200		7,200	
30	Amort ITC	(12)	-	(12)	-	(12)		(12)	
31	NET OPERATING INCOME	24,474	(638)	23,836	942	24,778	8,059	32,837	
RATE BASE: PLANT IN SERVICE									
32	Underground Storage	29,714	700	30,414	1,464	31,878		31,878	
33	Distribution Plant	505,864	(5,627)	500,237	34,459	534,696		534,696	
34	General Plant	141,661	(2,800)	138,861	17,572	156,434		156,434	
35	Total Plant in Service	677,239	(7,726)	669,513	53,495	723,008	-	723,008	
ACCUMULATED DEPREC/AMORT									
36	Underground Storage	(11,566)	(223)	(11,789)	(9)	(11,798)		(11,798)	
37	Distribution Plant	(151,240)	2,330	(148,910)	784	(148,126)		(148,126)	
38	General Plant	(38,750)	(1,141)	(39,891)	(1,864)	(41,754)		(41,754)	
39	Total Accum. Depreciation/Amort.	(201,556)	966	(200,590)	(1,089)	(201,679)	-	(201,679)	
40	NET PLANT	475,683	(6,761)	468,922	52,406	521,329	-	521,329	
41	DEFERRED FIT	(91,014)	148	(90,866)	(20,216)	(111,082)		(111,082)	
42	Net Plant After DFIT	384,669	(6,613)	378,056	32,190	410,247	-	410,247	
43	GAS INVENTORY	10,411	-	10,411	-	10,411		10,411	
44	GAIN ON SALE OF BUILDING	-	-	-	-	-		-	
45	OTHER	7,359	(54)	7,305	11,610	18,915		18,915	
46	WORKING CAPITAL	3,494	(1,144)	2,350	-	2,350		2,350	
47	TOTAL RATE BASE	405,933	(7,811)	398,122	43,800	441,923	0	441,923	
48	RATE OF RETURN	6.03%		5.99%		5.61%		7.43%	

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES
CALCULATION OF REQUESTED GENERAL REVENUE REQUIREMENT
WASHINGTON NATURAL GAS
TWELVE MONTHS ENDED DECEMBER 31, 2019

Line No.	Description	Requested Base Rate Change 10/1/2021 (000's of Dollars)	Tariff Schedule 176	Overall Bill Impact
1	Pro Forma Rate Base	\$ 441,923		
2	Proposed Rate of Return	<u>7.43%</u>		
3	Net Operating Income Requirement	\$32,835		
4	Pro Forma Net Operating Income	<u>\$ 24,778</u>		
5	Net Operating Income Deficiency	\$8,057		
6	Conversion Factor	0.755463		
7	Revenue Requirement	\$10,666	\$ (10,666)	\$ -
8	Total Base Distribution Revenues*	\$ 105,173		
9	Percentage Base Distribution Revenue Increase	<u>10.14%</u>	-10.14%	0.0%
10	Total Present Billed Revenue	\$ 161,345		
11	Percentage Billed Revenue Increase	<u>6.61%</u>	-6.61%	0.0%

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

AVISTA UTILITIES PROPOSED COST OF CAPITAL WASHINGTON NATURAL GAS			
Proposed Capital Structure			
Component	Capital Structure	Cost	Weighted Cost
Debt	50.0%	4.97%	2.48%
Common	50.0%	9.90%	4.95%
Total	<u>100.00%</u>		<u>7.43%</u>

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

**AVISTA UTILITIES
REVENUE CONVERSION FACTOR
WASHINGTON NATURAL GAS
TWELVE MONTHS ENDED DECEMBER 31, 2019**

Line No.	Description	Factor
1	Revenues	1.000000
	Expense:	
2	Uncollectibles	0.003326
3	Commission Fees	0.002000
4	Washington Excise Tax	0.038392
6	Total Expense	<u>0.043718</u>
7	Net Operating Income Before FIT	0.956282
8	Federal Income Tax @ 21%	<u>0.200819</u>
9	REVENUE CONVERSION FACTOR	<u><u>0.755463</u></u>

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES		All Direct & Rebuttal filed adjustment supporting electronic files were provided as Exh. EMA-5 & EMA-9, see tab "Adj Cites to I									
WASHINGTON NATURAL GAS		RESTATEMENT ADJUSTMENTS									
TWELVE MONTHS ENDED DECEMBER 31, 2019		Exh. EMA-11									
(000'S OF DOLLARS)		Staff-059 Supplemental									
TAB		ROO Input	ADFIT	Def Deb&Cred	Work Cap	Remove AMI	B&O Tax	Prop Tax	Uncollectibles	Reg Fees	
Line No.	DESCRIPTION	Per Results Report	Deferred FIT Rate Base	Deferred Debits and Credits	Working Capital	Remove AMI Rate Base	Eliminate B & O Taxes	Restate Property Tax	Uncollectible Expense	Regulatory Expense	
		1.00	1.01	1.02	1.03	1.04	2.01	2.02	2.03	2.04	
		G-ROO	G-DFIT	G-DDC	G-WC	G-AMI	G-EBO	G-RPT	G-UE	G-RE	
	Adjustment Number										
	Workpaper Reference										
	REVENUES										
1	Total General Business	\$ 142,552	\$ -	\$ -	\$ -	\$ -	(5,116)	\$ -	\$ -	\$ -	
2	Total Transportation	5,183	-	-	-	-	(131)	-	-	-	
3	Other Revenues	60,090	-	-	-	-	-	-	-	-	
4	Total Gas Revenues	207,825	-	-	-	-	(5,247)	-	-	-	
	EXPENSES										
	Production Expenses										
5	City Gate Purchases	100,541	-	-	-	-	-	-	-	-	
6	Purchased Gas Expense	959	-	-	-	-	-	-	-	-	
7	Net Nat Gas Storage Trans	(1,928)	-	-	-	-	-	-	-	-	
8	Total Production	99,572	-	-	-	-	-	-	-	-	
	Underground Storage										
9	Operating Expenses	1,883	-	-	-	-	-	-	-	-	
10	Depreciation/Amortization	494	-	-	-	-	-	-	-	-	
11	Taxes	323	-	-	-	-	-	(66)	-	-	
12	Total Underground Storage	2,700	-	-	-	-	-	(66)	-	-	
	Distribution										
13	Operating Expenses	13,669	-	-	-	-	-	-	-	-	
14	Depreciation/Amortization	12,469	-	-	-	-	-	-	-	-	
15	Taxes	13,739	-	-	-	-	(5,235)	305	-	-	
16	Total Distribution	39,877	-	-	-	-	(5,235)	305	-	-	
17	Customer Accounting	6,398	-	15	-	-	-	-	166	-	
18	Customer Service & Information	9,664	-	-	-	-	-	-	-	-	
19	Sales Expenses	-	-	-	-	-	-	-	-	-	
	Administrative & General										
20	Operating Expenses	15,696	-	-	-	-	-	-	-	4	
21	Depreciation/Amortization	10,678	-	-	-	-	-	-	-	-	
22	Regulatory Amortizations	(3,003)	-	-	-	-	-	-	-	-	
23	Taxes	-	-	-	-	-	-	-	-	-	
24	Total Admin. & General	23,371	-	-	-	-	-	-	-	4	
25	Total Gas Expense	181,582	-	15	-	-	(5,235)	239	166	4	
26	OPERATING INCOME BEFORE FIT	26,243	-	(15)	-	-	(12)	(239)	(166)	(4)	
	FEDERAL INCOME TAX										
27	Current Accrual	(4,720)	-	(3)	-	-	(3)	(50)	(35)	(1)	
28	Debt Interest	-	5	0	6	96	-	-	-	-	
29	Deferred FIT	6,501	-	-	-	-	-	-	-	-	
30	Amort ITC	(12)	-	-	-	-	-	-	-	-	
31	NET OPERATING INCOME	\$ 24,474	\$ (5)	\$ (12)	\$ (6)	\$ (96)	\$ (10)	\$ (189)	\$ (131)	\$ (3)	
	RATE BASE										
	PLANT IN SERVICE										
32	Underground Storage	\$ 29,714	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
33	Distribution Plant	505,864	-	-	-	(10,036)	-	-	-	-	
34	General Plant	141,661	-	-	-	(11,292)	-	-	-	-	
35	Total Plant in Service	677,239	-	-	-	(21,327)	-	-	-	-	
	ACCUMULATED DEPRECIATION/AMORT										
36	Underground Storage	(11,566)	-	-	-	-	-	-	-	-	
37	Distribution Plant	(151,240)	-	-	-	301	-	-	-	-	
38	General Plant	(38,750)	-	-	-	1,658	-	-	-	-	
39	Total Accumulated Depreciation/Amortization	(201,556)	-	-	-	1,959	-	-	-	-	
40	NET PLANT	475,683	-	-	-	(19,368)	-	-	-	-	
41	DEFERRED TAXES	(91,014)	(994)	-	-	1,019	-	-	-	-	
42	Net Plant After DFIT	384,669	(994)	-	-	(18,350)	-	-	-	-	
43	GAS INVENTORY	10,411	-	-	-	-	-	-	-	-	
44	GAIN ON SALE OF BUILDING	-	-	-	-	-	-	-	-	-	
45	OTHER	7,359	-	(1)	-	(53)	-	-	-	-	
46	WORKING CAPITAL	3,494	-	-	(1,144)	-	-	-	-	-	
47	TOTAL RATE BASE	\$ 405,933	\$ (994)	\$ (1)	\$ (1,144)	\$ (18,403)	\$ -	\$ -	\$ -	\$ -	
48	RATE OF RETURN	6.03%									
50	REVENUE REQUIREMENT	7,528	-91	16	-105	-1,683	13	250	174	4	

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES
 WASHINGTON NATURAL GAS
 TWELVE MONTHS ENDED DECEMBER 31, 2019
 (000'S OF DOLLARS)

Exh. EMA-5/EMA-11". Updated Adjustment on Rebuttal supporting files provided as Exh. EMA-11, copies of DR resp

Line No.	DESCRIPTION	TAB	Inj&Dam	FIT	Office Space	Excise	Net Gains&Los	Weather Norm	Elim Adder	Misc Exp
		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	
		2.05	2.06	2.07	2.08	2.09	2.10	2.11	2.12	
		G-ID	G-FIT	G-OSC	G-RET	G-NGL	G-WNGC	G-EAS	G-MR	
	Adjustment Number									
	Workpaper Reference									
	REVENUES									
1	Total General Business	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (3,931)	\$ 8,060	\$ -	
2	Total Transportation	-	-	-	-	-	-	-	-	
3	Other Revenues	-	-	-	-	-	2,095	(59,974)	(444)	
4	Total Gas Revenues	-	-	-	-	-	(1,836)	(51,914)	(444)	
	EXPENSES									
	Production Expenses									
5	City Gate Purchases	-	-	-	-	-	(1,655)	(47,738)	-	
6	Purchased Gas Expense	-	-	-	-	-	(3)	-	-	
7	Net Nat Gas Storage Trans	-	-	-	-	-	-	1,928	-	
8	Total Production	-	-	-	-	-	(1,658)	(45,810)	-	
	Underground Storage									
9	Operating Expenses	-	-	-	-	-	-	-	-	
10	Depreciation/Amortization	-	-	-	-	-	-	-	-	
11	Taxes	-	-	-	-	-	-	-	-	
12	Total Underground Storage	-	-	-	-	-	-	-	-	
	Distribution									
13	Operating Expenses	-	-	-	-	-	-	-	(2)	
14	Depreciation/Amortization	-	-	-	-	(11)	-	-	-	
15	Taxes	-	-	-	1	-	(151)	309	-	
16	Total Distribution	-	-	-	1	(11)	(151)	309	(2)	
17	Customer Accounting	-	-	-	-	-	(13)	27	-	
18	Customer Service & Information	-	-	-	-	-	-	(8,485)	1	
19	Sales Expenses	-	-	-	-	-	-	-	-	
	Administrative & General									
20	Operating Expenses	(9)	-	(16)	-	-	(8)	16	(399)	
21	Depreciation/Amortization	-	-	-	-	-	-	-	-	
22	Regulatory Amortizations	-	-	-	-	-	-	1,205	-	
23	Taxes	-	-	-	-	-	-	-	-	
24	Total Admin. & General	(9)	-	(16)	-	-	(8)	1,221	(399)	
25	Total Gas Expense	(9)	-	(16)	1	(11)	(1,830)	(52,738)	(400)	
26	OPERATING INCOME BEFORE FIT	9	-	16	(1)	11	(6)	824	(44)	
	FEDERAL INCOME TAX									
27	Current Accrual	2	-	3	(0)	2	(1)	173	(9)	
28	Debt Interest	-	-	-	-	-	-	-	-	
29	Deferred FIT	-	53	-	-	-	-	651	-	
30	Amort ITC	-	-	-	-	-	-	-	-	
31	NET OPERATING INCOME	\$ 7	\$ (53)	\$ 13	\$ (1)	\$ 9	\$ (5)	\$ (0)	\$ (35)	
	RATE BASE									
	PLANT IN SERVICE									
32	Underground Storage	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
33	Distribution Plant	-	-	-	-	-	-	-	-	
34	General Plant	-	-	-	-	-	-	-	-	
35	Total Plant in Service	-	-	-	-	-	-	-	-	
	ACCUMULATED DEPRECIATION/AMORT									
36	Underground Storage	-	-	-	-	-	-	-	-	
37	Distribution Plant	-	-	-	-	-	-	-	-	
38	General Plant	-	-	-	-	-	-	-	-	
39	Total Accumulated Depreciation/Amortization	-	-	-	-	-	-	-	-	
40	NET PLANT	-	-	-	-	-	-	-	-	
41	DEFERRED TAXES	-	-	-	-	-	-	-	-	
42	Net Plant After DFIT	-	-	-	-	-	-	-	-	
43	GAS INVENTORY	-	-	-	-	-	-	-	-	
44	GAIN ON SALE OF BUILDING	-	-	-	-	-	-	-	-	
45	OTHER	-	-	-	-	-	-	-	-	
46	WORKING CAPITAL	-	-	-	-	-	-	-	-	
47	TOTAL RATE BASE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
48	RATE OF RETURN									
50	REVENUE REQUIREMENT	-9	70	-17	1	-12	6	0	46	

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES
 WASHINGTON NATURAL GAS
 TWELVE MONTHS ENDED DECEMBER 31, 2019
 (000'S OF DOLLARS)

onenses provided as Exh. EMA-10.

Exh. EMA-11

Staff-039

Line No.	DESCRIPTION	TAB	Incent	Debt Calc	2019 AMA to EOP	Restated TOTAL
		Restating Incentives Expense	Restate Debt Interest	Restate 2019 AMA Rate Base to EOP	R-Ttl	
	Adjustment Number Workpaper Reference	2.13 G-RI	2.14 G-DI	2.15 G-EOP19		
REVENUES						
1	Total General Business	\$ -	\$ -	\$ -	\$ -	141,565
2	Total Transportation	-	-	-	-	5,052
3	Other Revenues	-	-	-	-	1,767
4	Total Gas Revenues	-	-	-	-	148,384
EXPENSES						
Production Expenses						
5	City Gate Purchases	-	-	-	-	51,148
6	Purchased Gas Expense	-	-	-	-	956
7	Net Nat Gas Storage Trans	-	-	-	-	-
8	Total Production	-	-	-	-	52,104
Underground Storage						
9	Operating Expenses	-	-	-	-	1,883
10	Depreciation/Amortization	-	-	(164)	-	330
11	Taxes	-	-	-	-	257
12	Total Underground Storage	-	-	(164)	-	2,470
Distribution						
13	Operating Expenses	-	-	-	-	13,667
14	Depreciation/Amortization	-	-	(112)	-	12,346
15	Taxes	-	-	-	-	8,968
16	Total Distribution	-	-	(112)	-	34,981
17	Customer Accounting	-	-	-	-	6,593
18	Customer Service & Information	-	-	-	-	1,180
19	Sales Expenses	-	-	-	-	-
Administrative & General						
20	Operating Expenses	219	-	-	-	15,504
21	Depreciation/Amortization	-	-	14	-	10,692
22	Regulatory Amortizations	-	-	-	-	(1,798)
23	Taxes	-	-	-	-	-
24	Total Admin. & General	219	-	14	-	24,398
25	Total Gas Expense	219	-	(262)	-	121,726
26	OPERATING INCOME BEFORE FIT	(219)	-	262	-	26,658
FEDERAL INCOME TAX						
27	Current Accrual	(46)	222	55	-	(4,411)
28	Debt Interest	-	-	(66)	-	41
29	Deferred FIT	-	-	-	-	7,205
30	Amort ITC	-	-	-	-	(12)
31	NET OPERATING INCOME	\$ (173)	\$ (222)	\$ 273	\$ -	23,836
RATE BASE						
PLANT IN SERVICE						
32	Underground Storage	\$ -	\$ -	\$ 700	\$ -	30,414
33	Distribution Plant	-	-	4,409	-	500,237
34	General Plant	-	-	8,492	-	138,861
35	Total Plant in Service	-	-	13,601	-	669,513
ACCUMULATED DEPRECIATION/AMORT						
36	Underground Storage	-	-	(223)	-	(11,789)
37	Distribution Plant	-	-	2,029	-	(148,910)
38	General Plant	-	-	(2,799)	-	(39,891)
39	Total Accumulated Depreciation/Amortization	-	-	(994)	-	(200,590)
40	NET PLANT	-	-	12,608	-	468,922
41	DEFERRED TAXES	-	-	123	-	(90,866)
42	Net Plant After DFIT	-	-	12,731	-	378,056
43	GAS INVENTORY	-	-	-	-	10,411
44	GAIN ON SALE OF BUILDING	-	-	-	-	-
45	OTHER	-	-	-	-	7,305
46	WORKING CAPITAL	-	-	-	-	2,350
47	TOTAL RATE BASE	\$ -	\$ -	\$ 12,731	\$ -	398,122
48	RATE OF RETURN				(1)	
50	REVENUE REQUIREMENT	229	294	890		7,604

(1) The Restated TOTAL column does not represent 12/31/2018 Test Period Commission Basis results of operation on a normalized basis (CBR basis). Differences exist due to inclusion of proposed cost of debt (pro forma versus CBR actual cost of debt) impacting Adjustment 2.14 above, and the inclusion of Restate 2018

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES
 WASHINGTON NATURAL GAS
 TWELVE MONTHS ENDED DECEMBER 31, 2019
 (000'S OF DOLLARS)

Updated Adjustment on Rebuttal supporting files provided as Exh. EMA-11. See tab "Adj Cites to Exh. EMA-5 & EMA-11"

PRO FORMA ADJUSTMENTS

Exh. EMA-11

Exh. EMA-11

Staff-038
 Supplemental

Staff-016 Sup. /
 PC-315

Line No.	DESCRIPTION	TAB	PF Rev Norm	PF Def Deb&Cred	PF ARAM	PF Labor-nonExec	PF Exec Lbr	PF Benefits
		3.01 G-PREV	3.02 G-PRA	3.03 G-ARAM	3.04 G-PLN	3.05 G-PLE	3.06 G-PEB	
		Pro Forma Revenue Normalization	Pro Forma Def. Debits, Credits & Regulatory Amorts	Pro Forma ARAM DFIT	Pro Forma Labor Non-Exec	Pro Forma Labor Exec	Pro Forma Employee Benefits	
	Adjustment Number							
	Workpaper Reference							
	REVENUES							
1	Total General Business	\$ (41,734)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	Total Transportation	290	-	-	-	-	-	-
3	Other Revenues	(1,153)	-	-	-	-	-	-
4	Total Gas Revenues	(42,597)	-	-	-	-	-	-
	EXPENSES							
	Production Expenses							
5	City Gate Purchases	(51,148)	-	-	-	-	-	-
6	Purchased Gas Expense	-	-	-	30	-	11	-
7	Net Nat Gas Storage Trans	-	-	-	-	-	-	-
8	Total Production	(51,148)	-	-	30	-	11	-
	Underground Storage							
9	Operating Expenses	-	-	-	-	-	-	-
10	Depreciation/Amortization	-	-	-	-	-	-	-
11	Taxes	-	-	-	-	-	-	-
12	Total Underground Storage	-	-	-	-	-	-	-
	Distribution							
13	Operating Expenses	-	-	-	424	-	167	-
14	Depreciation/Amortization	-	-	-	-	-	-	-
15	Taxes	(1,591)	-	-	-	-	-	-
16	Total Distribution	(1,591)	-	-	424	-	167	-
17	Customer Accounting	(138)	-	-	203	-	78	-
18	Customer Service & Information	-	-	-	18	-	8	-
19	Sales Expenses	-	-	-	-	-	-	-
	Administrative & General							
20	Operating Expenses	(83)	-	-	302	(97)	108	-
21	Depreciation/Amortization	-	-	-	-	-	-	-
22	Regulatory Amortizations	-	(230)	-	-	-	-	-
23	Taxes	-	-	-	-	-	-	-
24	Total Admin. & General	(83)	(230)	-	302	(97)	108	-
25	Total Gas Expense	(52,960)	(230)	-	977	(97)	372	-
26	OPERATING INCOME BEFORE FIT	10,363	230	-	(977)	97	(372)	-
	FEDERAL INCOME TAX							
27	Current Accrual	2,176	48	-	(205)	20	(78)	-
28	Debt Interest	-	-	-	-	-	-	-
29	Deferred FIT	-	-	(5)	-	-	-	-
30	Amort ITC	-	-	-	-	-	-	-
31	NET OPERATING INCOME	\$ 8,187	\$ 182	\$ 5	\$ (772)	\$ 77	\$ (294)	-
	RATE BASE							
	PLANT IN SERVICE							
32	Underground Storage	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-
33	Distribution Plant	-	-	-	-	-	-	-
34	General Plant	-	-	-	-	-	-	-
35	Total Plant in Service	-	-	-	-	-	-	-
	ACCUMULATED DEPRECIATION/AMORT							
36	Underground Storage	-	-	-	-	-	-	-
37	Distribution Plant	-	-	-	-	-	-	-
38	General Plant	-	-	-	-	-	-	-
39	Total Accumulated Depreciation/Amortization	-	-	-	-	-	-	-
40	NET PLANT	-	-	-	-	-	-	-
41	DEFERRED TAXES	-	-	-	-	-	-	-
42	Net Plant After DFIT	-	-	-	-	-	-	-
43	GAS INVENTORY	-	-	-	-	-	-	-
44	GAIN ON SALE OF BUILDING	-	-	-	-	-	-	-
45	OTHER	-	-	-	-	-	-	-
46	WORKING CAPITAL	-	-	-	-	-	-	-
47	TOTAL RATE BASE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-
48	RATE OF RETURN							
50	REVENUE REQUIREMENT	-10,837	-241	-7	1,022	-102	389	-

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES

WASHINGTON NATURAL GAS

TWELVE MONTHS ENDED DECEMBER 31, 2019

(000'S OF DOLLARS)

		Exh. EMA-11	Exh. EMA-11	Bench Request 2	Exh. EMA-11	Exh. EMA-11	Exh. EMA-11	
		Staff-044	Staff-049	Agreed to per	Staff-107	Staff-107	Staff-107	
		Supplemental	Supplemental	Settlement	Supplemental 3	Supplemental 3	Supplemental 3	
				Fee Free as Filed				
TAB		PF Insurance	PF ISIT	PR PropertyTx	PF Fee Free	2020 Cap Customer	2020 Cap Large&Dis	2020 Cap Programs
Line No.	DESCRIPTION	Pro Forma Insurance Expense	Pro Forma IS/IT Expense	Pro Forma Property Tax	Pro Forma Fee Free Amortization	Pro Forma 2020 Customer At Center	Pro Forma 2020 Large & Distinct	Pro Forma 2020 Programmatic
	Adjustment Number	3.07	3.08	3.09	3.10	3.11	3.12	3.13
	Workpaper Reference	G-PINS	G-PIT	G-PPT	G-PFEE	G-PCAP1	G-PCAP2	G-PCAP3
	REVENUES							
1	Total General Business	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
2	Total Transportation	-	-	-	-	-	-	-
3	Other Revenues	-	-	-	-	-	-	-
4	Total Gas Revenues	-	-	-	-	-	-	-
	EXPENSES							
	Production Expenses							
5	City Gate Purchases	-	-	-	-	-	-	-
6	Purchased Gas Expense	-	-	-	-	-	-	-
7	Net Nat Gas Storage Trans	-	-	-	-	-	-	-
8	Total Production	-	-	-	-	-	-	-
	Underground Storage							
9	Operating Expenses	-	-	-	-	-	-	-
10	Depreciation/Amortization	-	-	-	-	-	21	-
11	Taxes	-	-	9	-	-	-	-
12	Total Underground Storage	-	-	9	-	-	21	-
	Distribution							
13	Operating Expenses	-	-	-	-	-	-	-
14	Depreciation/Amortization	-	-	-	-	-	94	88
15	Taxes	-	-	116	-	-	-	-
16	Total Distribution	-	-	116	-	-	94	88
17	Customer Accounting	-	-	-	67	-	-	-
18	Customer Service & Information	-	-	-	-	-	-	-
19	Sales Expenses	-	-	-	-	-	-	-
	Administrative & General							
20	Operating Expenses	279	624	-	-	-	-	-
21	Depreciation/Amortization	-	-	-	-	588	3	56
22	Regulatory Amortizations	-	-	-	805	-	-	-
23	Taxes	-	-	-	-	-	-	-
24	Total Admin. & General	279	624	-	805	588	3	56
25	Total Gas Expense	279	624	126	872	588	118	144
26	OPERATING INCOME BEFORE FIT	(279)	(624)	(126)	(872)	(588)	(118)	(144)
	FEDERAL INCOME TAX							
27	Current Accrual	(59)	(131)	(26)	(183)	(124)	(25)	(30)
28	Debt Interest	-	-	-	-	(16)	(38)	(35)
29	Deferred FIT	-	-	-	-	-	-	-
30	Amort ITC	-	-	-	-	-	-	-
31	NET OPERATING INCOME	\$ (220)	\$ (493)	\$ (99)	\$ (689)	\$ (449)	\$ (55)	\$ (79)
	RATE BASE							
	PLANT IN SERVICE							
32	Underground Storage	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,464	\$ -
33	Distribution Plant	-	-	-	-	-	3,821	3,580
34	General Plant	-	-	-	-	2,368	410	1,116
35	Total Plant in Service	-	-	-	-	2,368	5,695	4,696
	ACCUMULATED DEPRECIATION/AMORT							
36	Underground Storage	-	-	-	-	-	(9)	-
37	Distribution Plant	-	-	-	-	-	965	914
38	General Plant	-	-	-	-	692	764	1,213
39	Total Accumulated Depreciation/Amortization	-	-	-	-	692	1,720	2,127
40	NET PLANT	-	-	-	-	3,060	7,415	6,822
41	DEFERRED TAXES	-	-	-	-	(66)	(164)	(192)
42	Net Plant After DFIT	-	-	-	-	2,994	7,251	6,630
43	GAS INVENTORY	-	-	-	-	-	-	-
44	GAIN ON SALE OF BUILDING	-	-	-	-	-	-	-
45	OTHER	-	-	-	-	-	-	-
46	WORKING CAPITAL	-	-	-	-	-	-	-
47	TOTAL RATE BASE	\$ -	\$ -	\$ -	\$ -	\$ 2,994	\$ 7,251	\$ 6,630
48	RATE OF RETURN							
50	REVENUE REQUIREMENT	292	653	131	912	889	786	757

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES

WASHINGTON NATURAL GAS

TWELVE MONTHS ENDED DECEMBER 31, 2019

(000'S OF DOLLARS)

		Exh. EMA-11	Exh. EMA-11	UPDATED	Bench Request 2	Revised to Reflect
		Staff-107	Staff-107	REVISED per BR-7	Agreed to per	Filed 2019
		Supplemental 3	Supplemental 3	UPDATED AMI	Settlement - LEAP as	Tax Return
		2020 Cap Mandatory	2020 Cap ShortLive	PF AMI	Filed	2019-ADFIT
Line No.	DESCRIPTION	3.14	3.15	3.16	3.17	3.18
		G-PCAP4	G-PCAP5	G-PAMI	G-PLEAP	G-RDFIT
	Adjustment Number					
	Workpaper Reference					
	REVENUES					
1	Total General Business	\$ -	\$ -	\$ -	\$ -	\$ -
2	Total Transportation	-	-	-	-	-
3	Other Revenues	-	-	-	-	-
4	Total Gas Revenues	-	-	-	-	-
	EXPENSES					
	Production Expenses					
5	City Gate Purchases	-	-	-	-	-
6	Purchased Gas Expense	-	-	-	-	-
7	Net Nat Gas Storage Trans	-	-	-	-	-
8	Total Production	-	-	-	-	-
	Underground Storage					
9	Operating Expenses	-	-	-	-	-
10	Depreciation/Amortization	-	-	-	-	-
11	Taxes	-	-	-	-	-
12	Total Underground Storage	-	-	-	-	-
	Distribution					
13	Operating Expenses	-	-	(944)	-	-
14	Depreciation/Amortization	204	-	763	-	-
15	Taxes	-	-	-	-	-
16	Total Distribution	204	-	(181)	-	-
17	Customer Accounting	-	-	-	-	-
18	Customer Service & Information	-	-	-	-	-
19	Sales Expenses	-	-	-	-	-
	Administrative & General					
20	Operating Expenses	-	-	-	-	-
21	Depreciation/Amortization	(4)	557	75	-	-
22	Regulatory Amortizations	-	-	3,492	1,550	-
23	Taxes	-	-	-	-	-
24	Total Admin. & General	(4)	557	3,567	1,550	-
25	Total Gas Expense	200	557	3,386	1,550	-
26	OPERATING INCOME BEFORE FIT	(200)	(557)	(3,386)	(1,550)	-
	FEDERAL INCOME TAX					
27	Current Accrual	(42)	(117)	(711)	(326)	-
28	Debt Interest	(55)	(15)	(170)	21	79
29	Deferred FIT	-	-	-	-	-
30	Amort ITC	-	-	-	-	-
31	NET OPERATING INCOME	\$ (104)	\$ (424)	\$ (2,505)	\$ (1,245)	\$ (79)
	RATE BASE					
	PLANT IN SERVICE					
32	Underground Storage	\$ -	\$ -	\$ -	\$ -	\$ -
33	Distribution Plant	8,342	-	18,716	-	-
34	General Plant	27	1,871	11,780	-	-
35	Total Plant in Service	8,369	1,871	30,496	-	-
	ACCUMULATED DEPRECIATION/AMORT					
36	Underground Storage	-	-	-	-	-
37	Distribution Plant	2,140	-	(3,235)	-	-
38	General Plant	244	1,155	(5,932)	-	-
39	Total Accumulated Depreciation/Amortization	2,384	1,155	(9,167)	-	-
40	NET PLANT	10,753	3,026	21,329	-	-
41	DEFERRED TAXES	(284)	(60)	(4,222)	-	(15,228)
42	Net Plant After DFIT	10,469	2,966	17,108	-	(15,228)
43	GAS INVENTORY	-	-	-	-	-
44	GAIN ON SALE OF BUILDING	-	-	-	-	-
45	OTHER	-	-	15,569	(3,959)	-
46	WORKING CAPITAL	-	-	-	-	-
47	TOTAL RATE BASE	\$ 10,469	\$ 2,966	\$ 32,677	\$ (3,959)	\$ (15,228)
48	RATE OF RETURN					
50	REVENUE REQUIREMENT	1,167	854	6,530	1,259	-1,393

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES
 WASHINGTON NATURAL GAS
 TWELVE MONTHS ENDED DECEMBER 31, 2019
 (000'S OF DOLLARS)

INFORMATIONAL
 ONLY
 TARIFF
 #176

TAB		Pro Forma Total	Strategic Tax DFIT Tariff	Billed Net Total After Tariff
Line No.	DESCRIPTION		4.00T G-Tax	Net Billed Total
	Adjustment Number Workpaper Reference	PF-STtl		
	REVENUES			
1	Total General Business	\$ 99,831	\$ -	\$ 99,831
2	Total Transportation	5,342	-	5,342
3	Other Revenues	614	-	614
4	Total Gas Revenues	105,787	-	105,787
	EXPENSES			
	Production Expenses			
5	City Gate Purchases	0	-	0
6	Purchased Gas Expense	997	-	997
7	Net Nat Gas Storage Trans	-	-	-
8	Total Production	998	-	998
	Underground Storage			
9	Operating Expenses	1,883	-	1,883
10	Depreciation/Amortization	351	-	351
11	Taxes	266	-	266
12	Total Underground Storage	2,500	-	2,500
	Distribution			
13	Operating Expenses	13,315	-	13,315
14	Depreciation/Amortization	13,494	-	13,494
15	Taxes	7,493	-	7,493
16	Total Distribution	34,302	-	34,302
17	Customer Accounting	6,803	-	6,803
18	Customer Service & Information	1,206	-	1,206
19	Sales Expenses	-	-	-
	Administrative & General			
20	Operating Expenses	16,636	-	16,636
21	Depreciation/Amortization	11,967	-	11,967
22	Regulatory Amortizations	3,820	(10,732)	(6,912)
23	Taxes	-	-	-
24	Total Admin. & General	32,423	(10,732)	21,691
25	Total Gas Expense	78,232	(10,732)	67,500
26	OPERATING INCOME BEFORE FIT	27,555	10,732	38,287
	FEDERAL INCOME TAX			
27	Current Accrual	(4,222)	2,254	(1,969)
28	Debt Interest	(187)	(32)	(219)
29	Deferred FIT	7,200	-	7,200
30	Amort ITC	(12)	-	(12)
31	NET OPERATING INCOME	\$ 24,778	\$ 8,510	\$ 33,288
	RATE BASE			
	PLANT IN SERVICE			
32	Underground Storage	\$ 31,878	\$ -	\$ 31,878
33	Distribution Plant	534,696	-	534,696
34	General Plant	156,434	-	156,434
35	Total Plant in Service	723,008	-	723,008
	ACCUMULATED DEPRECIATION/AMORT			
36	Underground Storage	(11,798)	-	(11,798)
37	Distribution Plant	(148,126)	-	(148,126)
38	General Plant	(41,754)	-	(41,754)
39	Total Accumulated Depreciation/Amortization	(201,679)	-	(201,679)
40	NET PLANT	521,329	-	521,329
41	DEFERRED TAXES	(111,082)	6,091	(104,991)
42	Net Plant After DFIT	410,247	6,091	416,338
43	GAS INVENTORY	10,411	-	10,411
44	GAIN ON SALE OF BUILDING	-	-	-
45	OTHER	18,915	-	18,915
46	WORKING CAPITAL	2,350	-	2,350
47	TOTAL RATE BASE	\$ 441,923	\$ 6,091	\$ 448,014
48	RATE OF RETURN			
50	REVENUE REQUIREMENT	10,666	(10,666)	(0)

[REVISED - Bench Request 7 - Attachment D - Rebuttal with AMI Update]

AVISTA UTILITIES

Washington Gas

(000's OF DOLLARS)

TWELVE MONTHS ENDED DECEMBER 31, 2019

Column	WP Ref	Description	Washington Gas		
			NOI	Rate Base	ROR
Restating Adjustments					
1.00	G-ROO	Per Results Report	\$24,474	\$405,933	6.03%
1.01	G-DFIT	Deferred FIT Rate Base	(5)	(994)	
1.02	G-DDC	Deferred Debits and Credits	(12)	(1)	
1.03	G-WC	Working Capital	(6)	(1,144)	
1.04	G-AMI	Remove AMI Rate Base	(96)	(18,403)	
2.01	G-EBO	Eliminate B & O Taxes	(10)	0	
2.02	G-RPT	Restate Property Tax	(189)	0	
2.03	G-UE	Uncollectible Expense	(131)	0	
2.04	G-RE	Regulatory Expense	(3)	0	
2.05	G-ID	Injuries & Damages	7	0	
2.06	G-FIT	FIT / DFIT Expense	(53)	0	
2.07	G-OSC	Office Space Charges to Non-Utility	13	0	
2.08	G-RET	Restate Excise Taxes	(1)	0	
2.09	G-NGL	Net Gains & Losses	9	0	
2.10	G-WNGC	Weather Normalization / Gas Cost Adjust	(5)	0	
2.11	G-EAS	Eliminate Adder Schedules	(0)	0	
2.12	G-MR	Misc. Restating Non-Util / Non- Recurring Expense	(35)	0	
2.13	G-RI	Restating Incentives Expense	(173)	0	
2.14	G-DI	Restate Debt Interest	(222)	0	
2.15	G-EOP19	Restate 2019 AMA Rate Base to EOP	273	12,731	
		Restated Total	<u>\$23,836</u>	<u>\$398,122</u>	5.99%
Pro Forma Adjustments					
3.01	G-PREV	Pro Forma Revenue Normalization	8,187	0	
3.02	G-PRA	Pro Forma Def. Debits, Credits & Regulatory Amorts	182	0	
3.03	G-ARAM	Pro Forma ARAM DFIT	5	0	
3.04	G-PLN	Pro Forma Labor Non-Exec	(772)	0	
3.05	G-PLE	Pro Forma Labor Exec	77	0	
3.06	G-PEB	Pro Forma Employee Benefits	(294)	0	
3.07	G-PINS	Pro Forma Insurance Expense	(220)	0	
3.08	G-PIT	Pro Forma IS/IT Expense	(493)	0	
3.09	G-PPT	Pro Forma Property Tax	(99)	0	
3.10	G-PFEE	Pro Forma Fee Free Amortization	(689)	0	
3.11	G-PCAP1	Pro Forma 2020 Customer At Center	(449)	2,994	
3.12	G-PCAP2	Pro Forma 2020 Large & Distinct	(55)	7,251	
3.13	G-PCAP3	Pro Forma 2020 Programmatic	(79)	6,630	
3.14	G-PCAP4	Pro Forma 2020 Mandatory & Compliance	(104)	10,469	
3.15	G-PCAP5	Pro Forma 2020 Short Lived	(424)	2,966	
3.16	G-PAMI	Pro Forma AMI Capital Adds	(2,505)	32,677	
3.17	G-PLEAP	Pro Forma LEAP Deferral Amortization	(1,245)	(3,959)	
3.18	G-RDFIT	Restate 2019 ADFIT	(79)	(15,228)	
		Pro Forma Total	<u>\$24,778</u>	<u>\$441,923</u>	5.61%
Other	CF WA Elec	Conversion Factor			
INFORMATIONAL ONLY					
4.00T	G-Tax	Strategic Tax DFIT Tariff	8,510	6,091	
		After Tariff # Strategic Tax Return	<u>\$33,288</u>	<u>\$448,014</u>	7.43%