TABLE OF CONTENTS

I.	POL	ICY AND GOVERNING PRINCIPLES
II.	RES	ULTS OF OPERATIONSCONTESTED ADJUSTMENTS
	A.	AVISTA'S REQUEST FOR THE KETTLE FALLS EQUITY "KICKER" SHOULD NOT BE APPROVED, AS IT DOES NOT MEET THE STATUTORY REQUIREMENTS
	В.	TREATMENT OF THE COMPANY'S GAIN ON THE SALE OF THE CENTRALIA PLANT
	C.	EXECUTIVE COMPENSATIONCEO BASE SALARY ADJUSTMENT 10
		1. National Comparison of CEO Base Salaries
		2. Regional and Internal Comparison of CEO Base Salaries
	D.	SIGNING BONUSES AND RESTRICTED STOCKS
	E.	PROFORMA INCREASE TO OFFICERS' SALARIES
	F.	ALLOCATION OF OFFICERS' SALARIES BETWEEN REGULATED AND NON-REGULATED OPERATIONS
	G.	TEAM INCENTIVE BONUSES
	H.	RELOCATION EXPENSES
	I.	INJURIES AND DAMAGES
		1. 1991 Firestorm Litigation Expenses
		2. 1996 Ice Storm Expenses
	J.	HYDRO RELICENSING
	K.	NEZ PERCE SETTLEMENT

	L.	MISC	ELLANEOUS ADJUSTMENTS	28
		1.	Name Change Expenses	28
		2.	Y2K Expenses	29
	M.	STAF	F RESTATING ADJUSTMENTS	30
		1.	Political Advertising	30
		2.	Allocation of Costs of New CEO Search	31
		3.	Paul Redmond Tribute Film	31
	N.	REST.	ATE EXCISE TAXES/FRANCHISE FEES	31
III.	FOR A	A POW	SSION SHOULD NOT APPROVE AVISTA'S REQUEST ER COST ADJUSTMENT MECHANISM AT THIS	31
	A.		WUTC HAS PREVIOUSLY SET OUT CRITERIA FOR UATION OF A PROPOSED PCA MECHANISM	33
		1.	A PCA Shifts Risks of Higher Power Costs from the Company to the Ratepayers	34
	B.		COMPANY'S PROPOSED PCA DOES NOT MEET THE MISSION'S CONDITIONS FOR APPROVAL OF A PCA	35
	C.		F HAS ADDITIONAL CONCERNS ABOUT THE PANY'S REVISED PCA MECHANISM	39
		1.	The Proposed PCA Mechanism Contains No Incentives For Least-Cost Acquisition of Power	39
		2.	The Hourly Shape Adjustment in the Proposed PCA Is Difficult to Follow	40
	D.	CUST POSS COM	F RECOMMENDS A PUBLIC PROCESS, WITH OMER INVOLVEMENT, TO EXPLORE THE BILITIES OF A PCA MECHANISM IF THE MISSION WISHES TO CONSIDER ADOPTING A MECHANISM	. 40

	E.	COM	ORE APPROVING A PCA MECHANISM, THE MISSION MAY WANT TO EXPLORE OTHER EMAKING OPTIONS	41
	F.	THA	EVIDENCE PRESENTED IN THIS CASE SUGGESTS Γ AVISTA MAY NOT NEED A PCA MECHANISM . GOING-FORWARD BASIS	41
IV.	POW	ER SUI	PPLY ISSUES-STIPULATED ADJUSTMENTS	41
	A.	WAT	ER YEARS STIPULATION	42
	B.	MID-	COLUMBIA ADJUSTMENT	43
	C.	<u>FUEL</u>	CELL ADJUSTMENT	44
	D.		CULATIONS RELATING TO UNCONTESTED USTMENTS	44
		1.	Settlement Exchange Power	44
		2.	Proforma Potlatch July 2000-June 2001	44
V.	POW	ER SUI	PPLY ISSUESCONTESTED ADJUSTMENTS	45
	A.	PGE (CAPACITY CONTRACT ADJUSTMENT	45
		1.	Avista Improperly Characterizes the Series of Transactions Involving its Assignment in 1998 of all its Rights and Obligations Under the PGE Capacity Contract to an Affiliated Interest for \$143.4 Million, and Proposes that Rates be Based Upon a Contractural Fiction that Does Not Exist	47
		2.	Avista's Proposed Ratemaking Treatment of PGE's Buydown of the Capacity Contract Improperly Withholds from Ratepayers the Benefits of the \$145 Million Lump-Sum Payment that Avista Received in 1998	50
		3.	Avista's Wholly Inadequate Notice to the Commission of this Highly Complex and Significant Series of Transactions, Involving the Receipt of \$143.4 Million	

		for the Buydown of the PGE Capacity Contract, Provides Evidence that the Company Intended to Retain all of the Benefits of this Transaction, to the Exclusion of the Ratepayers		
	B.	POTLATCH PURCHASE ADJUSTMENT		
	C.	RATHDRUM LEASE ADJUSTMENT57		
	D.	WOOD POWER AMORTIZATION BUYOUT		
	E.	DISPATCH CREDIT ADJUSTMENT		
	F.	COLSTRIP AVAILABILITY65		
	G.	CAPACITY PURCHASE ADJUSTMENT		
	H.	CENTRALIA POWER SUPPLY EXPENSE		
	I.	MARKET TRANSACTION ADJUSTMENT		
VI.	MISCELLANEOUS ISSUES			
	A.	PROFORMA RESTATE DEBT INTEREST		
	B.	CONVERSION FACTOR		
	C.	DEMAND SIDE MANAGEMENT (DSM) PROGRAMS AND TARIFF		
	D.	PROFORMA DEPRECIATION (ELECTRIC AND GAS)		
OVERALL RATE OF RETURN FOR A		MISSION STAFF RECOMMENDS THAT THE FAIR RALL RATE OF RETURN FOR AVISTA UTILITIES BE SET O MORE THAN 8.64%		
	A.	INTRODUCTION AND OVERVIEW		
		1. Recommendations of the Parties		
		2. The Commission Should Determine the Appropriate Capital Structure and Rate of Return for the Regulated		

		Avista Corporation as a Whole
	В.	THE CAPITAL STRUCTURE RECOMMENDED BY DR. LURITO IS THE MOST APPROPRIATE CAPITAL STRUCTURE TO USE IN SETTING AVISTA'S RATES
	C.	<u>COST OF DEBT</u>
		1. The Cost of Debt Used to Set Rates in this Case Should be the Most Current, Reliable Estimates of the Company's Costs
	D.	COST OF COMMON EQUITY CAPITAL
		1. General Principles
		2. The Presentation of the Company–Dr. William Avera
		3. The Presentation of Staff–Dr. Richard Lurito
		4. Cost of Common Equity–Summary
	E.	THE COMPANY'S REQUEST FOR AN UPWARD ADJUSTMENT TO ITS RETURN ON EQUITY, OR EQUITY "KICKER" OF 25 BASIS POINTS SHOULD BE REJECTED
VIII.	COST	Γ OF SERVICE, RATE SPREAD, AND RATE DESIGN101
	A.	COST OF SERVICE STUDIES
		1. Electric Cost of Service Studies
		2. Natural Gas Cost of Service Studies
	B.	ELECTRIC RATE SPREAD
	C.	ELECTRIC RATE DESIGN
	D.	GAS RATE SPREAD
	E.	<u>GAS RATE DESIGN</u>

IX.	CONCLUSION	 103