

**Exh. KMH-7
Dockets UE-240006/UG-240007
Witness: Kristen M. Hillstead**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

**WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,**

Complainant,

v.

AVISTA CORPORATION,

Respondent.

**DOCKETS UE-240006 & UG-240007
(Consolidated)**

EXHIBIT TO

TESTIMONY OF

KRISTEN M. HILLSTEAD

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

*Avista's Response to Public Counsel Data Request No. 297 Attachment B (electric)
and Attachment C (natural gas)*

July 3, 2024

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

JURISDICTION:	WASHINGTON	DATE PREPARED:	05/23/2024
CASE NO.:	UE-240006 & UG-240007	WITNESS:	Elizabeth Andrews
REQUESTER:	Public Counsel	RESPONDER:	Liz Andrews
TYPE:	Data Request	DEPT:	Regulatory Affairs
REQUEST NO.:	PC – 297	TELEPHONE:	(509) 495-8601
		EMAIL:	liz.andrews@avistacorp.com

**SUBJECT: Labor
 REQUEST:**

Direct Testimony of Elizabeth M. Andrews, Exh. EMA-1T at 13 Table No. 2.

Please provide the O&M annual amounts for both electric and natural gas net of the expenses adjusted separately in this rate case.

RESPONSE:

Table No. 2 in the direct testimony of Ms. Andrews (Exh. EMA-1T, pg. 13) provides the net electric and natural gas total O&M for the periods 2018 – 2022.

Electric and natural gas PF Adjustments 3.14 and 5.06 starts with total electric and natural gas O&M expense as of 12ME 06.2023 (historical test period) and removes all test period actual O&M expenses which are otherwise restated or pro formed elsewhere in the Company’s filing, minimizing the remaining actual test period O&M expenses to only those costs not otherwise adjusted. This subset of O&M expenses (approximately 11.7% electric and 6.9% natural gas of remaining O&M expenses) are then escalated by the average growth in total O&M expense from 2018-2022.

The Company has not performed this individual annual analysis to tease out the subset of O&M for the periods 2018 – 2022, as the last and only analysis performed by the Company utilizing this method was for the 2022 WA GRC test period utilizing 12ME September 30, 2021. Annual individual pro forma adjustment data has not been prepared for each period 2018-2022, and would be time-consuming to do so.

However, to reflect a more current historical average, the Company is providing the total O&M information as of 12.2023 (per the Company’s normalized Commission Basis Reports (CBRs) filed in April 2024), which would update Table No. 2 of (Exh. EMA-1T, pg 13) as follows:

UPDATED - Table No. 2 Exh. EMA-1T							
	2018	2019	2020	2021	2022	2023	Average
Electric	\$ 146,848	\$ 155,757	\$ 162,760	\$ 169,899	\$ 187,348	\$ 182,876	
		6.07%	4.50%	4.39%	10.27%	-2.39%	4.57%
Natural Gas	2018	2019	2020	2021	2022*	2023	4-Yr Avg
	\$ 37,298	\$ 39,437	\$ 42,735	\$ 40,856	\$ 43,529	\$ 45,777	
		5.73%	8.36%	-4.40%	6.54%	5.16%	4.28%
	*2022 correction						

See PC-DR-297 Attachment B (electric 2018-2023) and PC-DR-297 Attachment C (natural gas 2018-2023) for this updated information.

Using this updated information – actual total O&M for the period 12ME 12.31.2023, and restating and pro forma information available with this case, the Company has updated the PF Misc. O&M workpapers provided in this case to reflect actual total O&M as of 12.31.2023, removing 12.2023 actual O&M expenses which are otherwise restated or pro formed in the Company’s filing, minimizing the remaining actual O&M expenses as of 12.31.2023 to only those costs not otherwise adjusted. See PC-DR-297 Attachment A for this detail. As can be seen from PC-DR-297 Attachment A, tab “Electric,” and the table below – this results in the subset of O&M as of 12.2023 totals \$62.214 million (13.0% of total 12.2023 O&M) versus the subset O&M as of 06.2023 of \$56.312 million – an incremental actual O&M increase of \$5.9 million. Escalating the actual O&M expense to reflect the revised average expected increase in O&M of 4.57% per Table No. 2 above (reduced from the as-filed average of 6.3%), results in incremental escalated amounts of \$2.84 million annually in 2024 and 2025, for a total increase from 06.2023 test period results of \$11.583 million. When comparing this to the As-filed adjustment (\$8.876 million), this results in an incremental increase in expense of \$2.7 million, or \$2.8 million revenue requirement.

As can be seen from PC-DR-297 Attachment A, tab “Natural Gas,” and the table below – this results in the subset of O&M as of 12.2023 totals \$13.818 million (6.6% of total 12.2023 O&M) versus the subset O&M as of 06.2023 of \$14.286 million – an incremental actual O&M reduction of \$0.5 million. Escalating the actual O&M expense to reflect the revised average expected increase in O&M of 4.28% per Table No. 2 above (reduced from the as-filed average of 4.57%), results in incremental escalated amounts of \$0.592 million annually in 2024 and 2025, for a total increase from 06.2023 test period results of \$716,000. When comparing this to the As-filed adjustment (\$1.634 million), this results in an decrease in expense of \$918,000, or \$964,000 revenue requirement.

Rate Year 1 (2025)	(000s)	Electric	Natural Gas
O&M Subset as of 12.31.2023		\$ 62,214	\$ 13,818
O&M Subset as of 06.30.2023		\$ 56,312	\$ 14,286
Incremental O&M Subset 12.2023 vs 06.2023		\$ 5,902	\$ (468)
Growth %		4.57%	4.28%
2023 Actual increase/(decrease) 06.2023 vs 12.2023		\$ 5,902	\$ (468)
2024		\$ 2,841	\$ 592
2025		\$ 2,841	\$ 592
Total 2025 O&M Increase		\$ 11,583	\$ 716
As-Filed		\$ 8,876	1634
Incremental change in Expense from As-Filed		\$ 2,707	\$ (918)
Incremental Revenue Req. Change from AS-Filed		\$ 2,842	\$ (964)
Rate Year 2 (2026)		\$ 2,841	\$ 592
As-Filed		\$ 3,550	\$ 653
Incremental change in Expense from As-Filed		\$ (709)	\$ (61)
Incremental Revenue Req. Change from AS-Filed		\$ (745)	\$ (64)

Using this same expected annual increase in 2026 for electric (\$2.841 million) and natural gas (\$592,000), results in a reduction to as-filed expenses in RY2 of \$709,000 for electric and \$61,000 for natural gas. This results in an overall reduction in RY2 revenue requirement from that as-filed of \$745,000 electric and \$64,000 natural gas.

ELECTRIC COST AND REVENUE TREND CALCULATIONS 2018-2023

Commission Basis Results of Operations

AVISTA UTILITIES

(000'S OF DOLLARS)

Line	2018	2019	2020	2021	2022	2023
No. REVENUES						
1 Total General Business	\$496,969	\$503,862	\$515,431	\$535,288	\$561,096	\$573,296
2 Interdepartmental Sales	1,101	1,228	1,173	1,189	1,306	1,355
3 Sales for Resale	42,324	36,286	36,044	46,508	74,744	87,261
4 Total Sales of Electricity	540,394	541,376	552,648	582,985	637,146	661,912
5 Other Revenue	18,073	23,698	21,765	21,911	18,193	34,714
6 Total Electric Revenue	558,467	565,074	574,413	604,896	655,339	696,626
EXPENSES						
Production and Transmission						
7 Operating Expenses	132,992	134,241	125,455	140,274	158,977	148,733
8 Purchased Power	73,968	74,282	74,245	71,634	68,924	77,438
9 Depreciation/Amortization	28,724	32,447	38,192	41,112	42,714	44,108
10 Regulatory Amortization	3,308	2,620	(647)	(384)	1,106	(612)
11 Taxes	16,795	17,039	16,909	15,727	14,846	13,066
12 Total Production & Transmission	255,787	260,629	254,154	268,363	286,567	282,733
Distribution						
13 Operating Expenses	23,753	26,747	22,661	23,178	33,396	39,002
14 Depreciation/Amortization	32,066	31,074	32,894	35,032	37,273	43,727
15 Taxes	28,420	28,751	28,856	29,969	30,759	28,776
16 Total Distribution	84,239	86,572	84,411	88,179	101,428	111,505
17 Customer Accounting	11,983	11,167	11,290	9,838	5,314	12,990
18 Customer Service & Information	1,551	1,590	1,314	1,066	1,113	1,531
19 Sales Expenses	59	0	0	131	109	44
Administrative & General						
20 Operating Expenses	51,109	54,986	72,503	73,721	84,564	84,324
21 Depreciation/Amortization	27,999	31,202	28,528	30,910	37,149	43,848
22 Regulatory Deferrals/Amortization	(527)	(711)	389	843	262	0
23 Taxes	0	0	4,687	4,408	4,278	4,493
24 Total Admin. & General	78,581	85,477	106,107	109,882	126,253	132,665
25 Total Electric Expenses	432,200	445,435	457,276	477,459	520,784	541,468
26 OPERATING INCOME BEFORE FIT	126,267	119,639	117,137	127,437	134,555	155,159
FEDERAL INCOME TAX						
27 Current Accrual	12,179	3,484	1,695	10,689	12,147	5,788
28 Debt Interest	125	296	350	199	1	83
29 Deferred Income Taxes	1,014	7,763	6,967	(3,320)	(14,217)	9,022

ELECTRIC COST AND REVENUE TREND CALCULATIONS 2018-2023

30	Amortized ITC - Noxon	(317)	(318)	(318)	2,769	13,004	(313)
	Levelized Settlement Exchange Power	0	0	0	0	0	0
31	NET OPERATING INCOME	\$113,266	\$108,414	\$108,443	\$117,100	\$123,620	\$140,578
RATE BASE							
PLANT IN SERVICE							
32	Intangible	\$189,271	\$211,035	\$216,378	\$231,011	\$243,566	\$251,075
33	Production	905,266	930,160	937,387	953,991	982,617	806,925
34	Transmission	477,024	509,897	540,754	589,960	620,777	661,631
35	Distribution	1,086,668	1,136,809	1,181,371	1,265,321	1,433,972	1,544,368
36	General	260,548	279,555	287,733	293,672	308,131	320,563
37	Total Plant in Service	2,918,777	3,067,456	3,163,623	3,333,955	3,589,063	3,584,561
ACCUMULATED DEPRECIATION/AMORT							
38	Intangible	43,469	57,078	72,611	87,129	102,032	114,830
39	Production	365,167	382,437	402,763	430,942	452,489	291,125
40	Transmission	140,271	147,016	153,938	160,007	166,510	178,571
41	Distribution	335,270	352,811	352,905	380,015	441,942	475,618
42	General	93,140	92,865	95,550	100,252	109,267	118,705
43	Total Accumulated Depreciation	977,317	1,032,207	1,077,767	1,158,345	1,272,240	1,178,850
44	NET PLANT	1,941,460	2,035,249	2,085,856	2,175,610	2,316,823	2,405,711
45	DEFERRED TAXES	(411,001)	(415,541)	(416,473)	(404,162)	(396,585)	(394,028)
46	Net Plant After Deferred Income Taxes	1,530,459	1,619,708	1,669,383	1,771,448	1,920,238	2,011,683
47	DEFERRED DEBITS AND CREDITS	(2,132)	(2,096)	(4,259)	(28,649)	24,155	41,140
48	WORKING CAPITAL	46,614	40,710	35,853	53,553	74,983	101,968
49	TOTAL RATE BASE	\$1,574,941	\$1,658,143	\$1,700,977	\$1,808,056	\$2,019,378	\$2,152,984

**AVISTA UTILITIES
WASHINGTON ELECTRIC RESULTS
(000'S OF DOLLARS)**

Line		2018	2019	2020	2021	2022	2023	
No.	Exclude Power Supply and Adder Schedule Expenses (DSM Tariff Rider and Residential Exchange Credit) from O&M							
1	Production/Transmission	CBR Ln 7	132,992	134,241	125,455	140,274	158,977	148,733
2	Purchased Power	CBR Ln 8	73,968	74,282	74,245	71,634	68,924	77,438
3	Distribution	CBR Ln 13	23,753	26,747	22,661	23,178	33,396	39,002
4	Customer Accounting	CBR Ln 17	11,983	11,167	11,290	9,838	5,314	12,990
5	Customer Service and Information	CBR Ln 18	1,551	1,590	1,314	1,066	1,113	1,531
6	Sales	CBR Ln 19	59	0	0	131	109	44
7	Administrative and General	CBR Ln 20	51,109	54,986	72,503	73,721	84,564	84,324
8	Total Operating & Maintenance Expenses		295,415	303,013	307,468	319,842	352,397	364,062

ELECTRIC COST AND REVENUE TREND CALCULATIONS 2018-2023

9	Deduct Power Supply Expenses	(148,567)	(147,256)	(149,395)	(154,351)	(169,327)	(185,679)
10	Deduct DSM Tariff Rider Expenses	0	0	0	0	0	0
11	Deduct Res X Credit Expenses	0	0	0	0	0	0
12	CS2/Colstrip 2012 Deferral/Amort	0	0	0	0	0	0
13	Remove Wind Storm	0	0	0	0	0	0
14	Reclass A&G Payroll Taxes (2020 FERC Change)			4,687	4,408	4,278	4,493
15	Adjusted Operating Expenses	146,848	155,757	162,760	169,899	187,348	182,876
			6.07%	4.50%	4.39%	10.27%	-2.39%

NATURAL GAS COST AND REVENUE TREND CALCULATIONS 2018-2023

AVISTA UTILITIES

WASHINGTON NATURAL GAS RESULTS

Commission Basis Results of Operations

(000'S OF DOLLARS)

Line No.	DESCRIPTION	2018 Restated Total	2019 Restated Total	2020 Restated Total	2021 Restated Total	2022 Restated Total	2023 Restated Total
REVENUES							
1	Total General Business	\$ 146,870	\$ 141,562	\$ 150,632	\$ 156,824	\$ 190,081	\$ 216,260
2	Total Transportation	4,960	5,052	4,441	4,758	5,137	4,937
3	Other Revenues	(4,216)	1,767	(2,554)	4,842	2,585	(623)
4	Total Gas Revenues	147,614	148,381	152,519	166,424	197,803	220,574
EXPENSES							
Production Expenses							
5	City Gate Purchases	51,519	51,148	48,833	53,229	75,720	88,886
6	Purchased Gas Expense	959	956	751	838	839	760
7	Net Nat Gas Storage Trans	-	-	-	-	1	-
8	Total Production	52,478	52,104	49,584	54,067	76,560	89,646
Underground Storage							
9	Operating Expenses	1,532	1,883	1,865	1,847	1,970	1,932
10	Depreciation/Amortization	627	494	435	471	498	522
11	Taxes	224	299	304	176	211	128
12	Total Underground Storage	2,383	2,676	2,604	2,494	2,679	2,582
Distribution							
13	Operating Expenses	12,308	13,667	11,783	11,443	13,216	20,229
14	Depreciation/Amortization	11,629	12,458	13,601	14,632	15,753	17,021
15	Taxes	9,458	9,180	9,080	9,585	11,123	11,775
16	Total Distribution	33,395	35,305	34,464	35,660	40,092	49,025
17	Customer Accounting	6,967	6,542	5,158	4,592	4,200	6,369
18	Customer Service & Information	1,232	1,180	911	680	679	624
19	Sales Expenses	-	-	-	-	-	-
Administrative & General							
20	Operating Expenses	14,612	15,441	21,165	20,507	22,611	22,635
21	Depreciation/Amortization	7,965	8,758	9,039	12,552	12,241	12,913
22	Regulatory Amortizations	51	122	1,313	(32)	2,491	(6,272)
23	Taxes	-	-	1,323	1,180	1,292	1,911
24	Total Admin. & General	22,628	24,321	32,840	34,207	38,635	31,187
25	Total Gas Expense	119,083	122,128	125,561	131,700	162,845	179,433
26	OPERATING INCOME BEFORE FIT	28,531	26,253	26,958	34,724	34,958	41,141
FEDERAL INCOME TAX							
27	Current Accrual	2,893	(4,692)	(2,517)	(2,184)	(919)	9,118
28	Debt Interest	43	117	132	79	15	5
29	Deferred FIT	393	7,205	4,573	3,667	(2,664)	(5,836)
30	Amort ITC	(15)	(12)	(6)	2,062	6,945	-

NATURAL GAS COST AND REVENUE TREND CALCULATIONS 2018-2023

31	NET OPERATING INCOME	\$ 25,216	\$ 23,635	\$ 24,776	\$ 31,100	\$ 31,581	\$ 37,854	
	RATE BASE							
	PLANT IN SERVICE							
32	Underground Storage	\$ 28,442	\$ 29,714	\$ 31,103	\$ 32,489	\$ 33,841	\$ 34,923	
33	Distribution Plant	455,595	484,536	510,059	551,736	624,173	673,510	Formula
34	General Plant	114,053	141,661	154,767	159,298	157,618	160,425	
35	Total Plant in Service	598,090	655,911	695,929	743,523	815,632	868,857	
	ACCUMULATED DEPRECIATION/AMORT							
36	Underground Storage	11,051	11,566	12,024	12,393	12,897	13,328	
37	Distribution Plant	144,969	149,281	148,924	159,371	180,965	196,001	
38	General Plant	32,354	38,750	47,445	54,204	58,268	64,152	
39	Total Accumulated Depreciation/Amortization	188,374	199,597	208,393	225,968	252,130	273,481	
40	NET PLANT	409,716	456,314	487,536	517,555	563,502	595,377	Formula
41	DEFERRED TAXES	(89,585)	(90,989)	(92,258)	(87,915)	(87,210)	(82,946)	Formula
42	Net Plant After DFIT	320,131	365,325	395,278	429,640	476,292	512,431	
43	GAS INVENTORY	8,355	10,411	10,143	13,249	19,556	12,469	
44	GAIN ON SALE OF BUILDING	-	-	-	-	-	-	
45	OTHER	5,331	7,305	5,720	(7,128)	(1,381)	4,094	Formula
46	WORKING CAPITAL	7,549	2,350	(189)	2,180	2,914	18,839	
47	TOTAL RATE BASE	\$ 341,366	\$ 385,391	\$ 410,952	\$ 437,941	\$ 497,381	\$ 547,833	

**AVISTA UTILITIES
 WASHINGTON NATURAL GAS RESULTS
 (000'S OF DOLLARS)**

Natural Gas Data for Escalators

Line No.		2018	2019	2020	2021	2022	2023	
1	Underground Storage	1,532	1,883	1,865	1,847	1,970	1,932	
2	Distribution	12,308	13,667	11,783	11,443	13,216	12,879	
3	Customer Accounting	6,967	6,542	5,158	4,592	4,200	6,369	
4	Customer Service and Information	1,232	1,180	911	680	679	624	
5	Sales	0	0	0	0	0	0	
6	Administrative and General	14,612	15,441	21,165	20,507	22,611	22,389	
7	Operating expenses excluding production	36,651	38,713	40,882	39,069	42,676	44,193	
8	Add Non PGA production O&M expenses	959	956	751	838	0	760	
9	Deduct Gas Cost Rev Related Expenses	-312	-232	-221	-231	-439	-1,087	Formula
10	Deduct DSM Tariff Rider Expenses	0	0	0	0	0	0	
11	Deduct Decoupling Surcharge/Rebate Expenses	0	0	0	0	0	0	
12	Reclass A&G Payroll Taxes (2020 FERC Change)			1,323	1,180	1,292	1,911	
13	Adjusted Operating Expenses	37,298	39,437	42,735	40,856	43,529	45,777	
	Annual Percentage Change		5.73%	8.36%	-4.40%	6.54%	5.16%	Avg 4.28%

Update annually after hard code previous year row formula

Line No.	DESCRIPTION	(Note 1)	ADDED	ADDED	ADDED	ADDED	ADDED	ADDED
			2018	2019	2020	2021	2022	2023
			Remove	Remove	Remove	Remove	Remove	Remove
			Gas Cost	Gas Cost	Gas Cost	Gas Cost	Gas Cost	Gas Cost
REVENUES								
1	Total General Business	0.950157	-53,899	-53,433	-51,014	-55,597	-79,199	-93,549
2	Total Transportation							
3	Other Revenues		0	0	0	0	0	0
4	Total Gas Revenues		-53,899	-53,433	-51,014	-55,597	-79,199	-93,549
EXPENSES								
Production Expenses								
5	City Gate Purchases		-51,519	-51,148	-48,833	-53,229	-75,720	-88,886
6	Purchased Gas Expense		0	0	0	0	0	0
7	Net Nat Gas Storage Trans		0	0	0	0	0	0
8	Total Production		-51,519	-51,148	-48,833	-53,229	-75,720	-88,886
Underground Storage								
9	Operating Expenses							
10	Depreciation/Amortization							
11	Taxes							
12	Total Underground Storage		0	0	0	0	0	0
Distribution								
13	Operating Expenses							
14	Depreciation/Amortization							
15	Taxes	0.038227	-2,068	-2,053	-1,960	-2,137	-3,040	-3,576
16	Total Distribution		-2,068	-2,053	-1,960	-2,137	-3,040	-3,576
17	Customer Accounting	0.007617	-204	-125	-119	-120	-281	-713
18	Customer Service & Information							
19	Sales Expenses							
Administrative & General								
20	Operating Expenses	0.004000	-108	-107	-102	-111	-158	-374
21	Depreciation/Amortization							
22	Regulatory Amortizations							
23	Taxes							
24	Total Admin. & General		-108	-107	-102	-111	-158	-374
25	Total Gas Expense		-53,899	-53,433	-51,014	-55,597	-79,199	-93,549
26	OPERATING INCOME BEFORE FIT		0	0	0	0	0	0
FEDERAL INCOME TAX								
27	Current Accrual							
28	Debt Interest							
29	Deferred FIT							
30	Amort ITC							
31	NET OPERATING INCOME		0	0	0	0	0	0
Sales For Resale Revenue								
			-	-	-	-	-	-
Non PGA Gas Expense								
			959	956	751	838	839	760
check								
			959	956	751	838	840	760

AVISTA UTILITIES
WASHINGTON NATURAL GAS RESULTS
TWELVE MONTHS ENDED DECEMBER 31, 2018-2023
(000'S OF DOLLARS)

	2018	2019	2020	2021	2022	2023
Administration and General as filed						
21 Depreciation/Amortization	8,492	10,678	11,819	12,552	12,241	12,913
22 Regulatory Amortizations	(476)	(1,798)	(1,467)	(32)	2,491	(6,272)
Depreciation Expense - General Plant	4,244	5,325	5,558	5,379	5,072	5,191
Amortization Expense - Intangible Plant	4,248	5,353	6,261	7,173	7,169	7,722
Amortization Expense - Leasehold Improvements	-	-	-	-	-	-
MDM Deferrals	(769)	(2,228)	(2,944)	(2,042)	1,296	1,073
AFUDC Deferrals	242	308	164	187	209	209
Total Plant Related Depreciation/Amortization	7,965	8,758	9,039	10,697	13,746	14,195
Hamilton Street Bridge Amortization						
WA GRC JP O&M Deferral	-	-	-	-	-	-
WA Decoupling Deferral	-	-	-	-	-	-
WA Decoupling Amortization Revenue	0	0	0	0	0	0
Project Compass Deferral	-	-	-	-	-	-
Tax Reform Amortization	-	-	-	-	-	(61)
WA Excess Nat. Gas Line Extension Amort	390	584	1,747	2,135	2,135	1,745
Deferred FISERVE	(339)	(462)	247	544	172	-
Misc Amorts (Int Finding, Insur BA, Reg Fees, Remand Amort)						(1,289)
Pension Settlement / Williams Outage					(1,731)	(7,361)
COVID-19			(681)	(856)	410	(588)
Total Regulatory Amortizations	51	122	1,313	1,823	986	(7,554)
Check Total	8,016	8,880	10,352	12,520	14,732	6,641
Regulatory Deferrals & Amorts Excluding Revenue	51	122	1,313	1,823	986	(7,554)

	2018	2019	2020	2021	2022	2023
RATE BASE						
PLANT IN SERVICE						
32 Underground Storage	\$ 28,442	\$ 29,714	\$ 31,103	\$ 32,489	\$ 33,841	\$ 34,923
33 Distribution Plant	455,595	484,536	510,059	551,736	624,173	673,510
34 General Plant	114,053	141,661	154,767	159,298	157,618	160,425
35 Total Plant in Service	598,090	655,911	695,929	743,523	815,632	868,857
ACCUMULATED DEPRECIATION/AMORT						
36 Underground Storage	11,051	11,566	12,024	12,393	12,897	13,328
37 Distribution Plant	144,969	149,281	148,924	159,371	180,965	196,001
38 General Plant	32,354	38,750	47,445	54,204	58,268	64,152
39 Total Accumulated Depreciation/Amortization	188,374	199,597	208,393	225,968	252,130	273,481
40 NET PLANT	409,716	456,314	487,536	517,555	563,502	595,377
41 DEFERRED TAXES	(89,585)	(90,989)	(92,258)	(87,915)	(87,210)	(82,946)
42 Net Plant After DFIT	320,131	365,325	395,278	429,640	476,292	512,431
43 GAS INVENTORY	8,355	10,411	10,143	13,249	19,556	12,469
44 GAIN ON SALE OF BUILDING	-	-	-	-	-	-
45 OTHER	5,331	7,305	5,720	(7,128)	(1,381)	4,094
46 WORKING CAPITAL	7,549	2,350	(189)	2,180	2,914	18,839
47 TOTAL RATE BASE	\$ 341,366	\$ 385,391	\$ 410,952	\$ 437,941	\$ 497,381	\$ 547,833

Deferred Debits and Credits						
ADFIT on Gain on Sale of Office Bldg	ADFIT	-	-	-	-	-
DSM Investment	Dist Plant	-	-	-	-	-
Customer Advances	Dist Plant	-	(2)	(2)	(1)	-
Customer Deposits	Dist Plant	(566)	(568)	(544)	(56)	(2)
AFUDC Reg Asset and Tax Reform Reg Lia	Other	(751)	325	2,398	2,162	1,532
LEAP	Other		8,134	7,597	5,949	4,263
Regulatory Tax Credit	Other				(15,580)	(17,553)
Other Deferred Debits & Credits	Other	6,648	(530)	(3,732)	(2,833)	10,379
Total		5,331	7,359	5,717	(10,358)	(1,381)
Distribution Plant						
ADFIT						
Other		5,331	7,359	5,717	(10,358)	(1,381)
Remove AMI ADJ - remove			(53)			4,094
			7,306			