



Avista Corp.

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VIA ELECTRONIC MAIL

April 29, 2020

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Avista Utilities 2019 Natural Gas Commission Basis Report Pursuant to
WAC 480-090-257

Dear Mr. Johnson:

Enclosed for filing is an electronic copy of Avista Utilities 2019 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, 2019. 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

Received
Records Management
04/29/20 11:02
State Of WASH.
UTIL. AND TRANSP.
COMMISSION

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	
1.01	G-DFIT	Deferred FIT Rate Base	(6)	(994)	
1.02	G-DDC	Deferred Debits and Credits	(12)	(1)	
1.03	G-WC	Working Capital	(7)	(1,144)	
1.04	G-AMI	Remove AMI Rate Base	(105)	(18,403)	
2.01	G-EBO	Eliminate B & O Taxes	(9)	0	
2.02	G-RPT	Restate Property Tax	(389)	0	
2.03	G-UE	Uncollectible Expense	(92)	0	
2.04	G-RE	Regulatory Expense	46	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	(6)	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	(26)	0	
		Restated Total	<u>\$23,635</u>	<u>\$385,391</u>	6.13%
Other	CF WA Elec	Conversion Factor			

AVISTA UTILITIES

WASHINGTON NATURAL GAS

TWELVE MONTHS ENDED DECEMBER 31, 2019

(000'S OF DOLLARS)

RESTATEMENT ADJUSTMENTS

ACTUAL

RESULTS

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
	Adjustment Number	1.00	1.01	1.02	1.03	1.04	2.01	2.02	2.03	2.04
	Workpaper Reference	G-ROO	G-DFIT	G-DDC	G-WC	G-AMI	G-EBO	G-RPT	G-UE	G-RE
	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	-	-	-	-	-	(24)	-	-
12	Total Underground Storage	2,700	-	-	-	-	-	(24)	-	-
	Distribution									
13	Operating Expenses	13,669	-	-	-	-	-	-	-	-
14	Depreciation/Amortization	12,469	-	-	-	-	-	-	-	-
15	Taxes	13,739	-	-	-	-	(5,235)	517	-	-
16	Total Distribution	39,877	-	-	-	-	(5,235)	517	-	-
17	Customer Accounting	6,398	-	15	-	-	-	-	117	-
18	Customer Service & Information	9,664	-	-	-	-	-	-	-	-
19	Sales Expenses	-	-	-	-	-	-	-	-	-
	Administrative & General									
20	Operating Expenses	15,696	-	-	-	-	-	-	-	(58)
21	Depreciation/Amortization	10,678	-	-	-	-	-	-	-	-
22	Regulatory Amortizations	(3,003)	-	-	-	-	-	-	-	-
23	Taxes	-	-	-	-	-	-	-	-	-
24	Total Admin. & General	23,371	-	-	-	-	-	-	-	(58)
25	Total Gas Expense	181,582	-	15	-	-	(5,235)	493	117	(58)
26	OPERATING INCOME BEFORE FIT	26,243	-	(15)	-	-	(12)	(493)	(117)	58
	FEDERAL INCOME TAX									
27	Current Accrual	(4,720)	-	(3)	-	-	(3)	(104)	(25)	12
28	Debt Interest	-	6	0	7	105	-	-	-	-
29	Deferred FIT	6,501	-	-	-	-	-	-	-	-
30	Amort ITC	(12)	-	-	-	-	-	-	-	-
31	NET OPERATING INCOME	\$ 24,474	\$ (6)	\$ (12)	\$ (7)	\$ (105)	\$ (9)	\$ (389)	\$ (92)	\$ 46
	RATE BASE									
	PLANT IN SERVICE									
32	Underground Storage	\$ 29,714	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
33	Distribution Plant	505,864	-	-	-	(21,328)	-	-	-	-
34	General Plant	141,661	-	-	-	-	-	-	-	-
35	Total Plant in Service	677,239	-	-	-	(21,328)	-	-	-	-
	ACCUMULATED DEPRECIATION/AMORT									
36	Underground Storage	(11,566)	-	-	-	-	-	-	-	-
37	Distribution Plant	(151,240)	-	-	-	1,959	-	-	-	-
38	General Plant	(38,750)	-	-	-	-	-	-	-	-
39	Total Accumulated Depreciation/Amortization	(201,556)	-	-	-	1,959	-	-	-	-
40	NET PLANT	475,683	-	-	-	(19,369)	-	-	-	-
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%								

AVISTA UTILITIES

WASHINGTON NATURAL GAS

TWELVE MONTHS ENDED DECEMBER 31, 2019

(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
		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
	Adjstment Number								
	Workpaper Reference								
	REVENUES								
1	Total General Business	\$ -	\$ -	\$ -	\$ -	\$ -	(3,931)	\$ 8,057	\$ -
2	Total Transportation	-	-	-	-	-	-	-	-
3	Other Revenues	-	-	-	-	-	2,095	(59,974)	(444)
4	Total Gas Revenues	-	-	-	-	-	(1,836)	(51,917)	(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	-	-	-	-	-	(12)	24	-
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)	(1,829)	(52,741)	(400)
26	OPERATING INCOME BEFORE FIT	9	-	16	(1)	11	(7)	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	\$ (6)	\$ (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								

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

Line No.	DESCRIPTION	Restating Incentives Expense	Restate Debt Interest	Restated TOTAL
	Adjustment Number	2.13	2.14	
	Workpaper Reference	G-RI	G-DI	R-Ttl
	REVENUES			
1	Total General Business	\$ -	\$ -	\$ 141,562
2	Total Transportation	-	-	5,052
3	Other Revenues	-	-	1,767
4	Total Gas Revenues	-	-	148,381
	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	-	-	494
11	Taxes	-	-	299
12	Total Underground Storage	-	-	2,676
	Distribution			
13	Operating Expenses	-	-	13,667
14	Depreciation/Amortization	-	-	12,458
15	Taxes	-	-	9,180
16	Total Distribution	-	-	35,305
17	Customer Accounting	-	-	6,542
18	Customer Service & Information	-	-	1,180
19	Sales Expenses	-	-	-
	Administrative & General			
20	Operating Expenses	219	-	15,441
21	Depreciation/Amortization	-	-	10,678
22	Regulatory Amortizations	-	-	(1,798)
23	Taxes	-	-	-
24	Total Admin. & General	219	-	24,321
25	Total Gas Expense	219	-	122,128
26	OPERATING INCOME BEFORE FIT	(219)	-	26,253
	FEDERAL INCOME TAX			
27	Current Accrual	(46)	26	(4,692)
28	Debt Interest	-	-	117
29	Deferred FIT	-	-	7,205
30	Amort ITC	-	-	(12)
31	NET OPERATING INCOME	\$ (173)	\$ (26)	\$ 23,635
	RATE BASE			
	PLANT IN SERVICE			
32	Underground Storage	\$ -	\$ -	\$ 29,714
33	Distribution Plant	-	-	484,536
34	General Plant	-	-	141,661
35	Total Plant in Service	-	-	655,911
	ACCUMULATED DEPRECIATION/AMORT			
36	Underground Storage	-	-	(11,566)
37	Distribution Plant	-	-	(149,281)
38	General Plant	-	-	(38,750)
39	Total Accumulated Depreciation/Amortization	-	-	(199,597)
40	NET PLANT	-	-	456,314
41	DEFERRED TAXES	-	-	(90,989)
42	Net Plant After DFIT	-	-	365,325
43	GAS INVENTORY	-	-	10,411
44	GAIN ON SALE OF BUILDING	-	-	-
45	OTHER	-	-	7,305
46	WORKING CAPITAL	-	-	2,350
47	TOTAL RATE BASE	\$ -	\$ -	\$ 385,391
48	RATE OF RETURN			

AVISTA UTILITIES ACTUAL COST OF CAPITAL WASHINGTON NATURAL GAS DECEMBER 31, 2019			
Proposed Capital Structure			
<u>Component</u>	<u>Capital Structure</u>	<u>Cost</u>	<u>Weighted Cost</u>
Debt	51.21%	5.30%	2.71%
Common	48.79%	9.50%	4.64%
Total	<u>100.00%</u>		<u>7.35%</u>

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

Line No.	Description	Factor
1	Revenues	1.000000
	Expense:	
2	Uncollectibles	0.002996
3	Commission Fees	0.002000
4	Washington Excise Tax	0.038405
6	Total Expense	<u>0.043400</u>
7	Net Operating Income Before FIT	0.956600
8	Federal Income Tax @ 21%	0.200886
9	REVENUE CONVERSION FACTOR	0.755714

AVISTA UTILITIES

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2019

1.00 Per Results of Operation (ROO) Report

ROO Report amounts are for the twelve months ended December 31, 2019. 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 understated by approximately \$1,000 and therefore adjusted.
- 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 2019 of 2.57%. 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, 2019 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

AVISTA UTILITIES

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2019

2019 was adjusted to reflect the agreed upon changes in Docket No. UG-190335, reducing working capital \$1,144,000.

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.

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).

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).

AVISTA UTILITIES

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2019

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 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 2010 and 2019. 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.

AVISTA UTILITIES

Commission Basis Report Washington Natural Gas Adjustment Descriptions Twelve Months Ended December 31, 2019

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.

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 174 Tax Reform Temporary Rebate, Schedule 175 Decoupling surcharge or rebate, and Schedules 189, 190 and 191 Tariff Rider (DSM and LIRAP), 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. Lastly, this adjustment removes the true-up to the 2018 provision for decoupling earnings test rate refund recorded in 2019.

2.13 Restate Incentives

This adjustment restates O&M incentive compensation expense recorded in 2019 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.