

1 **BEFORE THE PUBLIC UTILITY COMMISSION**
2 **OF OREGON**

3 **UG 519**

4 In the Matter of
5 AVISTA CORPORATION dba AVISTA
6 UTILITIES,
7 Request for a General Rate Revision.

MOTION TO ADMIT STAFF EXHIBITS

8 Staff of the Public Utility Commission of Oregon (Staff), moves the Administrative Law
9 Judge (ALJ) for an order admitting the following exhibits into the record in the above-captioned
10 case.

| 11 Exhibit No. | Description |
|-----------------------|---|
| 12 Staff 100 | Opening Testimony of Curtis Dlouhy |
| 13 Staff 101 | Witness Qualifications Statement of Curtis Dlouhy |
| 14 Staff 102 | Written Public Comments and Public Comment Hearing Transcript |
| 15 Staff 200 | Opening Testimony of Kate Ayres |
| 16 Staff 201 | Witness Qualifications Statement of Kate Ayres |
| 17 Staff 202 | Exhibits in Support of Opening Testimony |
| 18 Staff 300 | Opening Testimony of Luz Mondragon |
| 19 Staff 301 | Witness Qualifications Statement of Luz Mondragon |
| 20 Staff 302 | Exhibits in Support of Opening Testimony |
| 21 Staff 303 | Avista's Change in EDIT Amortization |
| 22 Staff 304 | Avista's Cost Allocations |
| 23 Staff 305 | Oregon Gas Mis-Allocations |
| 24 Staff 306 | NARUC Allocations Guidelines |
| 25 Staff 400 | Opening Testimony of Itayi Chipanera and Bret Stevens |
| 26 Staff 401 | Witness Qualifications Statement of Itayi Chipanera |

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| 1 | Staff 402 | Witness Qualifications Statement of Bret Stevens |
| 2 | Staff 403 | Staff Rate Base Adjustment Calculation |
| 3 | Staff 404 | Non-Confidential Data Responses |
| 4 | Staff 500 | Opening Testimony of Matt Muldoon |
| 5 | Staff 501 | Witness Qualifications Statement of Matt Muldoon |
| 6 | Staff 502 | ROE-Three-Stage DCF: Peer Screen, Dividends, Earnings Per Share (EPS), and Hamada Equation |
| 7 | Staff 503 | ROE – Three-State DCF: Models X and Y |
| 8 | Staff 504 | ROE – Three-Stage DCF: Summary and Recommendation |
| 9 | Staff 505 | ROE: Capital Asset Pricing Model (CAPM) |
| 10 | Staff 506 | ROE: Gordon Growth – Single State DCF |
| 11 | Staff 507 | ROE: BEA Historical GDP Growth |
| 12 | Staff 508 | ROE: TIPS Implied Inflation |
| 13 | Staff 509 | Value Line (VL) Natural Gas and Water Utilities |
| 14 | Staff 510 | Financial News Utility Investors are Seeing |
| 15 | Staff 511 | S&P 500, 30-Year Returns |
| 16 | Staff 600 | Opening Testimony of Rose Pileggi |
| 17 | Staff 601 | Witness Qualifications Statement of Rose Pileggi |
| 18 | Staff 602 | Cost of Long-Term Debt Worksheet |
| 19 | Staff 603 | Responses to Staff Data Requests |
| 20 | Staff 700 | Opening Testimony of Ted Drennan |
| 21 | Staff 701 | Witness Qualifications Statement of Ted Drennan |
| 22 | Staff 702 | Exhibits in Support of Opening Testimony |
| 23 | Staff 800 | Opening Testimony of Bret Farrell |
| 24 | Staff 801 | Witness Qualifications Statement of Bret Farrell |
| 25 | Staff 802 | Non-Confidential Data Response (Avista’s Response to Staff’s SDR 92) |
| 26 | Staff 803 | Staff’s Wage and Salary Workpaper |

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| 1 | Staff 804 | Confidential Data Response (Avista's Response to Staff's Data Requests 63, 373) |
| 2 | Staff 900 | Opening Testimony of Dustin Ball |
| 3 | Staff 901 | Witness Qualifications Statement of Dustin Ball |
| 4 | Staff 902 | Data Request Responses |
| 5 | Staff 903 | Data Request Responses – Confidential |
| 6 | Staff 904 | Tables |
| 7 | Staff 1000 | Opening Testimony of Madison Bolton |
| 8 | Staff 1001 | Witness Qualifications Statement of Madison Bolton |
| 9 | Staff 1002 | Avista Responses to OPUC Data Requests |
| 10 | Staff 1003 | Staff Working Gas Analysis |
| 11 | Staff 1004 | Staff Underground Storage Expense Adjustment |
| 12 | Staff 1005 | Avista Confidential Response to OPUC Data Request 147, Att.1 |
| 13 | Staff 1100 | Opening Testimony of Mitchell Moore |
| 14 | Staff 1101 | Witness Qualifications Statement of Mitchell Moore |
| 15 | Staff 1200 | Opening Testimony of Jean Falconer |
| 16 | Staff 1201 | Witness Qualifications Statement of Jean Falconer |
| 17 | Staff 1202 | Exhibits in Support of Opening Testimony |
| 18 | Staff 1300 | Opening Testimony of Bret Stevens and Will Wheeler |
| 19 | Staff 1301 | Witness Qualifications Statement of Will Wheeler |
| 20 | Staff 1302 | Avista's Nonconfidential Responses to Staff's Data Requests |
| 21 | Staff 1303 | Avista's Confidential Responses to Staff's Data Requests |

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DECLARATION OF CURTIS DLOUHY

8 I, CURTIS DLOUHY, state the following, under penalty of perjury in the State of Oregon:

- 9 1. I am the acting manager of the Policy and Economic Analysis Section employed
10 in the Energy Program of the Public 3 Utility Commission of Oregon (OPUC).
11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit No. 100 and sponsored a Witness
13 Qualifications Statement pre-filed as Staff Exhibit No. 101. I also co-sponsored testimony in
14 support of a stipulation pre-filed as Stipulating Parties/100.
15 3. To the best of my knowledge, my pre-filed testimony and Witness Qualifications
16 Statement are true and accurate.

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18 I hereby declare that the above statement is true to the best of my knowledge and
19 belief, and that I understand it is made for use as evidence in court and is subject to
20 penalty for perjury.

21 SIGNED this 8th day of April, 2025.

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CURTIS DLOUHY, Ph.D.

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DECLARATION OF TED DRENNAN

8 I, TED DRENNAN, state the following, under penalty of perjury in the State of Oregon:

9 1. I am employed as an Energy Policy Analyst in the Energy Program of the Public
10 Utility Commission of Oregon (OPUC).

11 2. On behalf of Staff of the Public Utility Commission, I sponsored testimony for the
12 above-captioned docket pre-filed as Staff Exhibit No. 800 and sponsored a Witness
13 Qualifications Statement pre-filed as Staff Exhibit No. 801.

14 3. To the best of my knowledge, my pre-filed testimony and Witness Qualifications
15 Statement are true and accurate.

16
17 I hereby declare that the above statement is true to the best of my knowledge and
18 belief, and that I understand it is made for use as evidence in court and is subject to
19 penalty for perjury.

20 SIGNED this 8th day of April, 2025.

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23 *Ted Drennan*
 TED DRENNAN

