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September 30, 2009

Oregon Public Utility Commission
Attn: Filing Center
Administrative Regulatory Operations
550 Capitol St. N.E. Suite 215
Salem, OR 97308-2551

RE: UG186 – Joint Testimony & Exhibits

Avista Corporation d/b/a/ Avista Utilities, hereby submits for filing an original and five copies of Joint Testimony and Exhibits in UG 186.

Sincerely,

A handwritten signature in black ink, appearing to read "David Meyer", with a horizontal line extending to the right.

David Meyer
Vice President and Chief Counsel
Avista Corporation
509-495-4316
David.Meyer@avistacorp.com

Enclosures
cc: Service List

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this day served Joint Testimony in Docket UG-186, upon the parties listed below by mailing a copy thereof, postage prepaid and/or by electronic mail.

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I declare under penalty of perjury that the foregoing is true and correct.

Dated at Spokane, Washington this 30th day of September 2009.



Patty Oisness
Rates Coordinator

Docket UG 186
Stipulating Parties Exhibit 100
Owings, Norwood, Jenks and Pyron

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

JOINT TESTIMONY OF CARLA OWINGS,
KELLY NORWOOD, BOB JENKS AND PAULA PYRON

**In Support of
Stipulation Resolving All Cost of Capital, Revenue Requirement,
and Rate Spread/Rate Design Issues**

September 2009

1 **Q. Please state your names and positions.**

2 A. My name is Carla Owings. I am employed by the Public Utility Commission of
3 Oregon (“PUC”) as a Senior Revenue Requirement Analyst in the Electric and
4 Natural Gas Section. I am testifying on behalf of the Staff of the PUC (“Staff”). I
5 joined the PUC in April of 2002. I have worked for the State of Oregon as a Senior
6 Analyst for more than 15 years. I have provided testimony for the State of Oregon,
7 Department of Revenue, in Tax Court on property tax issues and for this
8 Commission in numerous financial and policy issues in a variety of PUC dockets.

9 My name is Kelly O. Norwood. I am employed by Avista Corporation (“the
10 Company”) as the Vice-President of State & Federal Regulation. I am a graduate of
11 Eastern Washington University with a Bachelor of Arts Degree in Business
12 Administration, majoring in Accounting. I joined the Company in June of 1981.
13 Over the past 28 years, I have spent approximately 17 years in the Rates Department
14 with involvement in cost of service, rate design, revenue requirements and other
15 aspects of ratemaking. I spent approximately 11 years in the Energy Resources
16 Department (power supply and natural gas supply) in a variety of roles, with
17 involvement in resource planning, system operations, resource analysis, negotiation
18 of power contracts, and risk management. I was appointed Vice-President of State
19 & Federal Regulation in March 2002.

20 My name is Bob Jenks. I am the Executive Director of the Citizens’ Utility
21 Board (“CUB”). I am a graduate of Willamette University with a Bachelor of
22 Science Degree in Economics. I have provided testimony and comments in a variety
23 of PUC dockets. Between 1982 and 1991, I worked for the Oregon State Public

1 Interest Research Group, the Massachusetts Public Interest Group and the Fund for
2 Public Interest Research on a variety of public policy issues. As Executive Director,
3 my responsibilities include the review of all utility and telecom filings in Oregon and
4 in this particular docket the representation of customers concerns that have arisen
5 from this Docket.

6 My name is Paula E. Pyron. I am an experienced energy law attorney serving
7 the last nine years as the Executive Director of the Northwest Industrial Gas Users
8 (“NWIGU”). NWIGU is a non-profit trade association of 38 industrial-sized natural
9 gas end users who have facilities in the states of Oregon, Washington and Idaho.
10 NWIGU provides information to its members on natural gas issues that impact their
11 facilities and represents its members’ interests in proceedings before the Federal
12 Energy Regulatory Commission and the Pacific Northwest state utility commissions,
13 including the PUC of Oregon. As Executive Director, my responsibilities include the
14 review of all filings made by LDCs in Oregon as well as the representation of the
15 industrial customers in connection with this Docket.

16 Hereafter, Staff, the Company, CUB and NWIGU will collectively be
17 referred to as the “Parties.”

18 **Q. What is the purpose of your joint testimony?**

19 A. The purpose of our joint testimony is to describe and support the Stipulation, filed on
20 September 29, 2009, between Commission Staff, CUB, NWIGU, and the Company
21 in Docket UG 186 (the “Stipulation”), which resolved all issues for the general rate
22 increase filed on June 26, 2009.

1 The Stipulation is the product of settlement discussions, open to all parties to
2 the UG 186 Docket. The Stipulation between the Parties, signed September 29,
3 2009, resolved all revenue requirement issues, including cost of capital issues, as
4 well as rate spread and rate design. We will refer to all revenue requirement
5 adjustments agreed to by the parties by the letter referenced in the Stipulation.

6 **Q. Have you prepared any Exhibits?**

7 A. Yes. The Parties' Exhibit 101 is the Stipulation filed September 29, 2009.

8
9 **Revenue Requirement for Rate Changes proposed to be Effective November 1, 2009**

10 **Q. What issues are included in the Stipulation appearing in Exhibit 101?**

11 A. Table 1, at page 3 in the Stipulation provides a summary of issues (a) through (p).

12 **Q. What is the basis of the Stipulation relating to the Issue (a), Rate of Return?**

13 A. This adjustment revises the Company requested cost of capital as follows: The
14 capital structure is 50% common stock equity and 50% long-term debt, return on
15 equity is 10.10%, and the cost of debt is 6.28%. This Stipulated cost of capital
16 results in a slight reduction from the currently Commission-authorized 8.21% rate of
17 return. The Company's original filing requested an 8.96 % rate of return. This
18 combination of capital structure and capital costs produces an authorized rate of
19 return of 8.19%, as shown in the table below:

	Ratio	Cost	Weighted Cost
Long-Term Debt	50.0%	6.28%	3.14%
Common Equity	50.0%	10.10%	5.05%
TOTAL	100.0%		8.19%

1 **Q. What is the basis of the Stipulation relating to the Issue (b), Common Property**
2 **Capital Additions?**

3 A. This adjustment removes a portion of 2009 and 2010 pro formed common property
4 additions.

5 **Q. What is the basis of the Stipulation relating to the Issue (c), 2010 Reinforcement**
6 **Capital Projects?**

7 A. This adjustment removes the 2010 pro formed capital additions that will not be
8 complete in 2010, including a portion of the East Medford Reinforcement Project
9 and the Roseburg Reinforcement Project.

10 **Q. What is the basis of the Stipulation relating to the Issue (d), Remove 2009**
11 **Capital Project?**

12 A. This adjustment removes the pro formed 2009 Natural Gas ERT Replacement capital
13 project.

14 **Q. What is the basis of the Stipulation relating to the Issue (e), Uncollectibles**
15 **Expense?**

16 A. This adjustment reflects using a revised 3-year historical average for uncollectible
17 accounts receivables and updating of the conversion factor resulting from this
18 change.

19 **Q. What is the basis of the Stipulation relating to the Issue (f), Remove Portion of**
20 **Pro Formed Employee?**

21 A. The Company originally included the entire cost of a new employee devoted solely
22 to Oregon operations. This adjustment removes approximately 91 percent of the
23 adjustment originally proposed by the Company to reflect only Oregon operations.

1 **Q. What is the basis of the Stipulation relating to the Issue (g), Wage and Salary**
2 **Adjustment?**

3 A. This wage and salary adjustment adjusts wages and salaries based on market studies
4 for 2007 as a base year. In addition, non-union labor was adjusted for a 3.8% CPI
5 adjustment for 2008 and no increase for 2009 or 2010. Union labor was adjusted for
6 3.5% for 2008, 3.0% for 2009 and 2.25% for 2010.

7 **Q. What is the basis of the Stipulation relating to the (h), Remove Wage and Salary**
8 **Adjustment?**

9 A. This adjustment removes the earnings test adjustment for wages and salaries
10 included in the Company's original request.

11 **Q. What is the basis of the Stipulation relating to the Issue (i), Customer Forecast**
12 **for 2010 test period?**

13 A. Staff adjusted the customer forecast for the 2010 test period based on normalized
14 historic growth.

15 **Q. What is the basis of the Stipulation relating to the Issue (j), Bonuses and**
16 **Incentives?**

17 A. The incentive calculation shall reduce the original amount proposed by the Company
18 (70/30 sharing) to reflect a 50/50 sharing of bonuses and incentives.

19 **Q. What is the basis of the Stipulation relating to the Issue (k), Customer Service**
20 **Expense?**

21 A. Staff's proposed adjustment removes costs included in the test period related to
22 Customer Service expenses.

1 **Q. What is the basis of the Stipulation relating to the Issue (l), Advertising**
2 **Expense?**

3 A. This adjustment removes costs related to advertising expense for Category C costs
4 and costs in excess of the limit for Category A advertising.

5 **Q. What is the basis of the Stipulation relating to the Issue (m), O&M**
6 **Distribution?**

7 A. This adjustment revises the forecasted O&M Distribution costs that had been pro
8 formed in the case.

9 **Q. What is the basis of the Stipulation relating to the Issue (n), Administrative and**
10 **General Expenses?**

11 A. This adjustment revises the forecasted Administrative and General expenses that had
12 been pro formed in the case.

13 **Q. What is the basis of the Stipulation relating to the Issue (o), FIT/SIT?**

14 A. This adjustment is a flow through adjustment for the federal and state tax impact of
15 rate base adjustments.

16 **Q. What is the basis of the Stipulation relating to the Issue (p), Working Capital**
17 **Adjustment?**

18 A. This adjustment reflects the impact of the Company's Accounts Receivable Sales
19 program.

20 **Q. On an overall basis, do the Parties believe that these adjustments produce a**
21 **revenue requirement that is fair, just and reasonable?**

22 A. Yes. That is why we support this Stipulation, notwithstanding the fact that we each
23 hold different positions on the individual adjustments included in the Stipulation.

Resolution of Rate Design and Rate Spread Issues

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Q. What is the basis of the Stipulation relating to the rate design and rate spread?

A. The spread of the overall revenue increase of \$8.750 million, or 7.10%, to the Company's service schedules generally reflects the cost of service studies included in the Company's filing. Staff's review led to recommending some slight adjustments to the Company rate spread proposals based on cost of service considerations. Other parties support Staff's recommendations for purposes of this Stipulation. The resulting revenue increase percentage for each of the service schedules is as follows:

Residential Service Sch. 410	7.71%
General Service Sch. 420	6.72%
Large General Service Sch. 424	2.67%
Interruptible Service Sch. 440	1.52%
Seasonal Service Sch. 444	3.14%
Transportation Service Sch. 456	18.24%

The calculation of the revenue increase by service schedule is shown in the Stipulation on Page 1 of Attachment B.

Q. What other terms associated with rate design and rate spread does the Stipulation contain?

A. The monthly customer charges under Residential Service Schedule 410 and General Service Schedule 420 will be increased by \$0.50, from \$6.00 to \$6.50 for Schedule 410 and from \$8.00 to \$8.50 for Schedule 420. The monthly customer charge for Large General Service Schedule 424 will be increased by \$2.00, from \$46.00 to \$48.00 per month. The usage (therm) charge within each of the sales service

1 schedules will be increased by the appropriate amount to result in the total revenue
2 increase for each schedule.

3 For Transportation Service Schedule 456, the monthly customer charge will
4 be increased by \$62.50 per month, from \$187.50 to \$250.00. The remaining revenue
5 increase within the Schedule is reflected through a uniform percentage increase
6 applied to the block (usage) rates within the Schedule.

7 The present and proposed rates, as well as the increases to all rate components within
8 the schedules, are shown in the Stipulation on Page 2 of Attachment B.

9 **Q. What other terms does the Stipulation include?**

10 A. Coincident with the November 1, 2009 effective date of the \$8.75 million general rate
11 increase supported by Parties in this docket, a \$2.4 million refund related to the
12 Senate Bill 408 2007 Tax Report (Docket No. UG 171(1)) will also be effective on
13 November 1, 2009. The refund rate will be in place during the months of November
14 and December of 2009, and will expire on December 31, 2009. The refund will be
15 allocated to each rate schedule on an equal percent of margin basis as each rate
16 schedule would have otherwise received if the amortization had taken place over a 12
17 month period. Avista anticipates that the increased revenues agreed upon in Docket
18 No. UG 186 will be equivalent to the refund amount during the refund period;
19 however, any over or under-refunded difference from the \$2.4 million, including a
20 carrying cost on the difference, will be carried forward to be included with the next
21 Senate Bill 408 tariff filing. The refund resolves all issues in Docket No. UG 171(1)
22 and the Company will withdraw its claim that a refund would result in confiscatory
23 rates, contingent upon Commission approval of this Settlement.

1 For these reasons, the settlement is in the public interest and should be
2 approved by the Commission. This Settlement also includes an agreement whereby
3 Avista would withdraw its claim of confiscation in Docket No. UG 171(1). As such,
4 this Stipulation resolves all outstanding issues in both Dockets.

5 **Statement of Staff**

6 **Q. Does Staff support the Stipulation Resolving all Revenue Requirement and Rate**
7 **Spread/Rate Design Issues submitted for filing in this docket?**

8 A. Yes. The outcome of the Stipulation produces a reasonable revenue requirement and
9 resulting rates for customers. It reflects Staff's recommended adjustments after
10 reviewing the original filing and considering additional information provided by
11 Avista and other parties. Therefore, Staff supports the Stipulation as fair, just and
12 reasonable. In addition, Staff supports early implementation of these rates in part
13 because the early implementation will result in a \$2.4 million refund to customers due
14 to the true-up of tax expense in the UG 171 case. This will provide for a full refund
15 to customers related to the 2007 tax year and will moot any question of whether the
16 refund would place Avista is in a position of confiscatory rates, for purposes of
17 settlement in this case.

18 **Statement of CUB**

19 **Q. Does CUB support the Stipulation Resolving all Revenue Requirement and Rate**
20 **Spread/Rate Design Issues submitted for filing in this docket?**

21 A. Yes, CUB supports the Stipulation as a reasonable result in this docket. Avista is
22 currently earning below its authorized ROE and a rate increase is necessary in order
23 to address Avista's earnings. CUB believes that a general rate case, such as UG 186

1 is the appropriate place to address a shortfall of revenues and earnings. In this case
2 CUB and other parties examined Avista's forecast costs for 2010 - CUB alone has
3 asked 81 Data Requests in this matter - and based on those forecasts CUB believes
4 that the Stipulation will produce just and reasonable rates. In addition, Avista has
5 agreed as part of the Stipulation in Docket UG 186 to withdraw its confiscatory rates
6 challenge in Docket UG 171 thus ensuring that customers will get a refund of tax
7 overpayments that were previously made by customers. CUB recommends that the
8 Commission accept the Stipulation entered in this matter.

9 **Statement of NWIGU**

10 **Q. Please explain why NWIGU supports the Stipulation.**

11 A. NWIGU believes the Stipulation is in the public interest and recommends the
12 Commission approve the settlement because the best interests of Avista's natural gas
13 customers are served by the underlying fair compromise on all revenue requirement
14 and rate spread and design issues. While the signing parties may each hold different
15 positions on the individual components of Avista's natural gas revenue requirement
16 addressed in the Stipulation, NWIGU supports the settlement as the agreement
17 reached reduces the increased revenue requirement to \$8.75 million as compared to
18 the \$14.2 million requested with Avista's original filing. The increase in Avista's
19 overall margin resulting from this case is quite large, an overall 28%, but it is
20 significantly reduced from Avista's original 45% increase. NWIGU engaged in
21 extensive discovery and workshop analysis in this proceeding in conjunction with its
22 shared expert witness with CUB. NWIGU supports this Stipulation as the overall

1 result is a fair compromise between Avista and its customers in current financial
2 markets.

3 NWIGU also finds this Stipulation to be in the public interest as the spread of
4 the gas rate increase is done in a manner that is consistent with the results of cost of
5 service analysis. It is important from NWIGU's perspective that all schedules are
6 moved towards their relative cost of service with a general rate case adjustment to
7 base rates. Moving rates closer to cost is appropriate, and is a significant reason
8 NWIGU supports the Stipulation. In addition, the Stipulation resolves the rate design
9 within Transportation Schedule 456 consistent with its costs by increasing the
10 customer charge and maintains an appropriate parity with Interruptible Sales Service
11 Schedule 440. In addition, Avista has agreed in this Stipulation to return its
12 customers' tax overpayments that are at issue in Docket UG 171(1) by withdrawing
13 its confiscatory rates challenge in that docket. The temporary refund adjustment for
14 the tax overpayment helps to mitigate the impact of the rate case increase from UG
15 186. Under the Stipulation, these temporary refund dollars are appropriately returned
16 to Avista's customers on an equal margin basis.

17 For the reasons set forth above, NWIGU believes the Stipulation is in the
18 public interest and should be approved by the Commission. By supporting this
19 Stipulation, NWIGU reserves the right to raise all issues compromised in this
20 proceeding in any future natural gas rate case.

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Conclusion

2 **Q. Does this Stipulation represent a complete resolution of all issues in this docket?**

3 A. Yes.

4 **Q. What do the Parties recommend regarding the Stipulations?**

5 A. We recommend that the Commission adopt the Stipulation in its entirety.

6 **Q. Does this conclude your joint testimony?**

7 A. Yes.

BEFORE THE
PUBLIC UTILITY COMMISSION OF OREGON

EXHIBIT 101 – STIPULATION

**In Support of
Stipulation Resolving All Cost of Capital, Revenue Requirement,
and Rate Spread/Rate Design Issues**

September 2009

SUMMARY TABLE OF ADJUSTMENTS TO REVENUE REQUIREMENT AND RATE BASE		
(000s of Dollars)		
	Revenue Requirement	Rate Base
Amount as Filed	\$14,205	\$147,649
Adjustments:		
a. Rate of Return Adjust return on equity to 10.1 percent, adjust cost of debt to 6.28 percent, and adjust capital structure to 50% Equity and 50% Debt	(1,936)	-
b. Common Property Capital Projects Removes pro forma 2009 and 2010 general plant capital projects.	(333)	(1,601)
c. 2010 Reinforcement Capital Projects Removes pro forma 2010 capital additions due to delays in completion.	(886)	(6,026)
d. Remove 2009 Capital Project Removes 2009 ERT capital project from pro forma additions.	(318)	(2,022)
e. Uncollectibles Expense Adjusts pro forma uncollectibles amount.	(55)	-
f. Remove Portion of Pro Formed Employee Allocates FTE to all jurisdictions.	(141)	-
g. Wage and Salary Adjusts for PUC wage and salary model.	(717)	(365)
h. Remove Wage & Salary Adjustment Removes earnings test adjustment.	(21)	(10)
i. Customer Forecast for 2010 Test Period Adjusts Customer Forecast for 2010 Test Period.	(229)	-
j. Bonuses and Incentives Adjusts bonuses and Incentives for 50/50 sharing.	(65)	-
k. Customer Service Expense Removes costs included in test period related to Customer Service Expense.	(19)	-
l. Advertising Expense Removes excess Category A and Category C expenses.	(85)	-
m. O&M Distribution Adjusts pro forma forecasted costs related to O&M Distribution costs.	(56)	-
n. Administrative and General Expenses Adjusts pro forma forecasted costs related to Administrative and General costs.	(242)	-
o. FIT/SIT Flow through adjustment.	146	-
p. Cash Working Capital Adjustment Adjusts rate base for the turning effect of the sale of receivables.	(498)	(4,210)
Total Adjustments	(5,455)	(14,234)
Adjusted Revenue Requirement and Rate Base	\$ 8,750	\$ 133,415

1 a. Rate of Return – This adjustment reduces Avista’s requested cost of capital to an
 2 overall cost of capital equal to 8.19% based on the following components: a capital
 3 structure consisting of 50% common stock equity and 50% long-term debt, return on
 4 equity of 10.10%, and a long-term debt cost of 6.28%. This combination of capital
 5 structure and capital costs is shown in the schedule below:

Agreed-upon Cost of Capital	Percent of Total Capital	Cost	Component
Long-term Debt	50.0%	6.28%	3.14%
Common Equity	50.0%	10.10%	5.05%
Total	100.0%		8.19%

11 b. Common Property Capital Projects - This adjustment removes a portion of 2009
 12 and 2010 pro formed common property additions.

13 c. 2010 Reinforcement Capital Projects – This adjustment removes the 2010 pro
 14 formed capital additions that will not be complete in 2010, including the East Medford
 15 Reinforcement Project and the Roseburg Reinforcement Project.

16 d. Remove 2009 Capital Project – This adjustment removes the pro formed 2009
 17 Natural Gas ERT Replacement capital project.

18 e. Uncollectibles Expense – This adjustment reflects using a revised 3-year
 19 historical average for uncollectible accounts receivables and for updating the conversion
 20 factor resulting from this change.

21 f. Remove Portion of Pro Formed Employee – The Company originally included the
 22 entire cost of a new employee devoted solely to Oregon operations. This adjustment

1 removes approximately 91 percent of the adjustment originally proposed by the Company
2 to reflect only Oregon operations.

3 g. Wage and Salary Adjustment – This wage and salary adjustment adjusts wages
4 and salaries based on market studies for 2007 as a base year. In addition, non-union labor
5 was adjusted for a 3.8% CPI adjustment for 2008 and no increase for 2009 or 2010.
6 Union labor was adjusted 3.5% for 2008, 3.0% for 2009 and 2.25% for 2010.

7 h. Remove Wage and Salary Adjustment – This adjustment removes the earnings
8 test adjustment for wages and salaries included in the Company’s original request.

9 i. Customer Forecast for 2010 test period - Staff adjusted the customer forecast for
10 the 2010 test period based on normalized historic growth.

11 j. Bonuses and Incentives - The incentive calculation shall reduce the original
12 amount proposed by the Company (70/30 sharing) to reflect a 50/50 sharing of bonuses
13 and incentives.

14 k. Customer Service Expense - Staff’s proposed adjustment removes costs included
15 in the test period related to Customer Service expenses.

16 l. Advertising Expense - This adjustment removes costs related to advertising
17 expense for Category C costs and costs in excess of the limit for Category A advertising.

18 m. O&M Distribution – This adjustment revises the forecasted O&M Distribution
19 costs that had been pro formed in the case.

20 n. Administrative and General Expenses - This adjustment revises the forecasted
21 Administrative and General expenses that had been pro formed in the case.

22 o. FIT/SIT – This adjustment is a flow through adjustment for the federal and state
23 tax impact of rate base adjustments.

1 p. Working Capital Adjustment – This adjustment proposes to account for the
2 benefit that customers receive by the Company’s Accounts Receivable Sales program.

3 7. **Rate Changes Proposed To Be Effective November 1, 2009:** The Parties support
4 having new rates consistent with this Stipulation be effective November 1, 2009.

5 8. **Senate Bill 408 Refund for the 2007 Tax Report:** Coincident with the November
6 1, 2009 effective date of the general rate increase in Docket No. UG 186, the Parties support a
7 \$2.4 million refund related to the Senate Bill 408 2007 Tax Report (Docket No. UG 171(1)) also
8 to be effective on November 1, 2009. The refund rate will be in place during the months of
9 November and December of 2009, and expire on December 31, 2009. The refund will be
10 allocated to each rate schedule on an equal percent of margin basis as each rate schedule would
11 have otherwise received if the amortization had taken place over a 12 month period. Avista
12 anticipates that the increased revenues agreed upon in Docket No. UG 186 will be equivalent to
13 the refund amount during the refund period; however, any over or under-refunded difference
14 from the \$2.4 million, including a carrying cost on the difference, will be carried forward to be
15 included with the next Senate Bill 408 tariff filing. The refund resolves all issues in Docket No.
16 UG 171(1) and the Company agrees to withdraw its claim that a refund would result in
17 confiscatory rates, contingent upon Commission approval of this Settlement.

18 9. **Rate Spread:** The Parties support the spread of the overall revenue increase of
19 \$8.750 million, or 7.10%, to the Company’s service schedules, which takes into account the
20 results of the cost of service studies included in the Company’s filing. The resulting revenue
21 increase percentage for each of the service schedules is as follows:

22 Residential Service Sch. 410	7.71%
23 General Service Sch. 420	6.72%

1	Large General Service Sch. 424	2.67%
2	Interruptible Service Sch. 440	1.52%
3	Seasonal Service Sch. 444	3.14%
4	Transportation Service Sch. 456	18.24%

5 The calculation of the revenue increase by service schedule is shown on Page 1 of
6 Attachment B.

7 10. **Rate Design:** The Parties support rate design changes as follows: the monthly
8 customer charges under Residential Service Schedule 410 and General Service Schedule 420 will
9 be increased by \$0.50, from \$6.00 to \$6.50 for Schedule 410 and from \$8.00 to \$8.50 for
10 Schedule 420. The monthly customer charge for Large General Service Schedule 424 will be
11 increased by \$2.00, from \$46.00 to \$48.00 per month. The usage (therm) charge within each of
12 the sales service schedules will be increased by the appropriate amount to result in the total
13 revenue increase for each schedule.

14 For Transportation Service Schedule 456, the monthly customer charge will be increased
15 by \$62.50 per month, from \$187.50 to \$250.00. The remaining revenue increase within the
16 Schedule is reflected through a uniform percentage increase applied to the block (usage) rates
17 within the Schedule.

18 The present and proposed rates, as well as the increases to all rate components within the
19 schedules, are shown on Page 2 of Attachment B.

20 11. The Parties agree that this Stipulation is in the public interest and results in an
21 overall fair, just and reasonable outcome.

22 12. The Parties agree that this Stipulation represents a compromise in the positions of
23 the Parties. As such, conduct, statements, and documents disclosed in the negotiation of this

1 Stipulation shall not be admissible as evidence in this or any other proceeding. Further, this
2 Stipulation sets forth the entire agreement between the Parties and supercedes any and all prior
3 communications, understandings, or agreements, oral or written, between the Parties pertaining
4 to the subject matter of this Stipulation.

5 13. This Stipulation will be offered into the record in this proceeding as evidence
6 pursuant to OAR 860-014-0085. The Parties agree to use best efforts to prepare and submit the
7 Stipulation and supporting materials to the Commission in time to permit the Commission to put
8 rates into effect by November 1, 2009. The Parties agree to support this Stipulation throughout
9 this proceeding and any appeal. The Parties further agree to provide witnesses to sponsor the
10 Stipulation at any hearing held, or, in a Party's discretion, to provide a representative at the
11 hearing authorized to respond to the Commission's questions on the Party's position as may be
12 appropriate.

13 14. If this Stipulation is challenged by any other party to this proceeding, the Parties to
14 this Stipulation reserve the right to cross-examine witnesses and put on such case as they deem
15 appropriate to respond fully to the issues presented, including the right to raise issues that are
16 incorporated in the settlement embodied in this Stipulation. Notwithstanding this reservation of
17 rights, the Parties agree that they will continue to support the Commission's adoption of the
18 terms of this Stipulation.

19 15. Should the Commission fail to adopt the Stipulation, or should the Commission
20 materially modify the Stipulation, any Party hereto shall have the right to withdraw from the
21 Stipulation and proceed with a resolution of all issues in this proceeding.

22 16. By entering into this Stipulation, no Party shall be deemed to have approved,
23 admitted, or consented to the facts, principles, methods, or theories employed by any other Party

1 in arriving at the terms of this Stipulation. No Party shall be deemed to have agreed that any
2 provision of this Stipulation is appropriate for resolving the issues in any other proceeding.

3 17. This Stipulation may be executed in counterparts and each signed counterpart shall
4 constitute an original document. The Parties further agree that any facsimile copy of a Party's
5 signature is valid and binding to the same extent as an original signature.

6 18. This Stipulation may not be modified or amended except by written agreement
7 among all Parties who have executed it.

8 This Stipulation is entered into by each Party on the date entered below such Party's
9 signature.

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DATED this 29th day of September 2009.

AVISTA CORPORATION

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: [Signature]

By: _____

Date: 9/29/09

Date: _____

NORTHWEST INDUSTRIAL GAS USERS

CITIZENS' UTILITY BOARD

By: _____

By: _____

Date: _____

Date: _____

1 in arriving at the terms of this Stipulation. No Party shall be deemed to have agreed that any
2 provision of this Stipulation is appropriate for resolving the issues in any other proceeding.

3 17. This Stipulation may be executed in counterparts and each signed counterpart shall
4 constitute an original document. The Parties further agree that any facsimile copy of a Party's
5 signature is valid and binding to the same extent as an original signature.

6 18. This Stipulation may not be modified or amended except by written agreement
7 among all Parties who have executed it.

8 This Stipulation is entered into by each Party on the date entered below such Party's
9 signature.


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DATED this _____ day of September 2009.

AVISTA CORPORATION

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

By: _____
Date: _____

By:  _____
Date: 9/29/09 _____

NORTHWEST INDUSTRIAL GAS USERS

CITIZENS' UTILITY BOARD

By: _____
Date: _____

By: _____
Date: _____

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10
11 DATED this _____ day of September 2009.

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13 AVISTA CORPORATION

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

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18 By: _____

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20 Date: _____

Date: _____

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24 NORTHWEST INDUSTRIAL GAS USERS

CITIZENS' UTILITY BOARD

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27 By:  _____

By: _____

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29 Date: 9/28/09 _____

Date: _____

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12

13 AVISTA CORPORATION

STAFF OF THE PUBLIC UTILITY
COMMISSION OF OREGON

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18 By: _____

By: _____

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20 Date: _____

Date: _____

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24 NORTHWEST INDUSTRIAL GAS USERS

CITIZENS' UTILITY BOARD

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28 By: _____

By:  _____

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30 Date: _____

Date: 9-28-09

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Avista Utilities
UG 186
Results of Operations
Twelve Months Ended December 31, 2010
(\$000)

	Results Per Company Filing (1)	Adjustments (2)	0 Adjusted (3)	Required Change for Reasonable Return (4)	Results at Reasonable Return (5)
SUMMARY SHEET					
1	Operating Revenues				
2	General Business	\$120,417	\$451	\$120,868	\$8,750
3	Transportation	2,386	0	2,386	0
4	Other Revenues	149	0	149	0
5	Total Operating Revenues	\$122,952	\$451	\$123,403	\$8,750
6	Operating Expenses				
7	Gas Purchased	\$89,027	\$210	\$89,237	\$0
8	General Operations & Maintenance	10,663	(839)	9,824	0
9	Administrative and General	7,577	(397)	7,181	0
10	Total Operation & Maintenance	\$107,267	(\$1,025)	\$106,242	\$0
11	Depreciation & Amortization	5,499	(237)	5,262	0
12	Taxes Other than Income	5,389	(154)	5,235	0
13	Income Taxes	(73)	1,016	943	3,355
14	Uncollectibles Expense	0	(54)	(54)	0
15	Total Operating Expenses	\$118,082	(\$454)	\$117,627	\$3,355
16	Net Operating Revenues	\$4,870	\$905	\$5,775	\$5,151
17	Average Rate Base				
18	Electric Plant in Service	\$266,488	(\$9,979)	\$256,509	\$0
19	Less: Accumulated Depreciation & Amortization	(95,789)	(241)	(96,030)	0
20	Accumulated Deferred Income Taxes	(25,201)	195	(25,006)	0
21	Accumulated Deferred Inv. Tax Credit	0	0	0	0
22	Net Utility Plant	\$145,498	(\$10,024)	\$135,474	\$0
23	Plant Held for Future Use	\$0	\$0	\$0	\$0
24	Acquisition Adjustments	0	0	0	0
25	Working Capital	0	0	0	0
26	Fuel Stock	0	0	0	0
27	Materials & Supplies	2,151	0	2,151	0
28	Customer Advances for Construction	0	0	0	0
29	Weatherization Loans	0	0	0	0
30	Prepayments	0	0	0	0
31	Misc. Deferred Debits	0	0	0	0
32	Misc. Rate Base Additions/(Deductions)	0	0	0	0
33	Total Average Rate Base	\$147,649	(\$14,234)	\$133,415	\$0
34	Rate of Return	3.30%		4.33%	8.19%
35	Implied Return on Equity	N/A		2.38%	10.10%

Avista Utilities
UG 186
Adjustments to Results of Operations
Twelve Months Ended December 31, 2010
(\$000)

	Uncollectibles Expense (S-1)	O&M Distribution (S-2)	Common Property Ratebase (S-3)	Remove Reinforce Projects (S-4)	O&M Only Oregon Corp Employee (S-5)	W&S Adjustment (3 year model) (S-6)	Remove ERT from Rbase (S-7)	Adjust Customer Forecast (S-8)	Adjust Bonuses and Incentives (S-9)	Customer Service Expense (S-10)	Advertising Expense Adjust (S-11)	A & G Accounts 920 through 935 (S-12)	FIT SIT Adjust (S-13)	Remove Avista W&S Adjustment (d) (S-14)	CUB/NWIGU Working Cap Adjust (S-15)	Total Adjustments (Base Rates)
1 Operating Revenues																
2 General Business	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$451	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$451
3 Transportation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
4 Other Revenues	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
5 Total Operating Revenues	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$451	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$451
6 Operating Expenses																
7 Gas Purchased	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$229	\$0	\$0	0	\$0	\$0	(\$19)	\$0	\$210
8 General Operations & Maintenance	0	(55)	0	0	(136)	(648)	0	0	0	0	0	0	0	0	0	(\$839)
9 Administrative and General	0	0	0	0	0	0	0	0	(63)	(18)	(82)	(234)	0	0	0	(\$397)
10 Total Operation & Maintenance	\$0	(\$55)	\$0	\$0	(\$136)	(\$648)	\$0	\$229	(\$63)	(\$18)	(\$82)	(\$233)	\$0	(\$19)	\$0	(\$1,025)
11 Depreciation	0	0	(111)	(79)	0	0	(47)	0	0	0	0	0	0	0	0	(\$237)
12 Amortization	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
13 Taxes Other than Income	0	0	(29)	(90)	0	(6)	(30)	0	0	0	0	0	0	0	0	(\$154)
14 Income Taxes	22	22	75	141	53	261	55	87	25	7	32	91	86	7	52	\$1,016
15 Uncollectibles Expense	(54)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	(\$54)
16 Total Operating Expenses	(\$32)	(\$33)	(\$65)	(\$28)	(\$83)	(\$392)	(\$22)	\$316	(\$38)	(\$11)	(\$50)	(\$142)	\$86	(\$12)	\$52	(\$454)
17 Net Operating Revenues	\$32	\$33	\$65	\$28	\$83	\$392	\$22	\$135	\$38	\$11	\$50	\$143	(\$86)	\$12	(\$52)	\$905
18 Average Rate Base																
19 Electric Plant in Service	0	0	(1,597)	(6,032)	0	(365)	(1,975)	0	0	0	0	0	0	(10)	0	(\$9,979)
20 Accumulated Depreciation & Amortization	0	0	(154)	(1)	0	(14)	(72)	0	0	0	0	0	0	0	0	(\$241)
21 Accumulated Deferred Income Taxes	0	0	149	7	0	14	25	0	0	0	0	0	0	0	0	\$195
22 Accumulated Deferred Inv. Tax Credit	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
23 Net Utility Plant	\$0	\$0	(\$1,601)	(\$6,026)	\$0	(\$365)	(\$2,022)	\$0	\$0	\$0	\$0	\$0	\$0	(\$10)	\$0	(\$10,024)
24 Plant Held for Future Use	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
25 Acquisition Adjustments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
26 Working Capital															(4,210)	(\$4,210)
27 Fuel Stock	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
28 Materials & Supplies	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
29 Customer Advances for Construction	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
30 Weatherization Loans	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
31 Prepayments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
32 Misc. Deferred Debits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
33 Misc. Rate Base Additions/(Deductions)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
34 Total Average Rate Base	\$0	\$0	(\$1,601)	(\$6,026)	\$0	(\$365)	(\$2,022)	\$0	\$0	\$0	\$0	\$0	\$0	(\$10)	(\$4,210)	(\$14,234)
35 Revenue Requirement Effect	(\$55)	(\$56)	(\$333)	(\$886)	(\$141)	(\$717)	(\$318)	(\$229)	(\$65)	(\$19)	(\$85)	(\$242)	\$146	(\$21)	(\$498)	(\$3,519)

Rate of Return Adjustment (1,936)

Total Revenue Requirement Impact (\$5,455)

Avista Utilities
UG 186
Adjustments to Results of Operations - Income Taxes
Twelve Months Ended December 31, 2010
(\$000)

Income Tax Calculations		Uncollectibles Expense (S-1)	O O&M Distribution (S-2)	Common Property Ratebase (S-3)	Remove Reinforce Projects (S-4)	O&M Only Oregon Corp Employee (S-5)	W&S Adjustment (3 year model) (S-6)	Remove ERT from Rbase (S-7)	Adjust Customer Forecast (S-8)	Adjust Bonuses and Incentives (S-9)	Customer Service Expense (S-10)	Advertising Expense Adjust (S-11)	A & G Accounts 920 through 935 (S-12)	FIT SIT Adjust (S-13)	Remove Avista W&S Adjustment (d) (S-14)	CUB/NWIGU Working Cap Adjust (S-15)	Total Adjustments (Base Rates) 0
1	Book Revenues	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$451	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$451
2	Book Expenses Other than Depreciation	(54)	(55)	(29)	(90)	(136)	(653)	(30)	229	(63)	(18)	(82)	(233)	0	(19)	0	(\$1,233)
3	State Tax Depreciation	0	0	(111)	(79)	0	0	(47)	0	0	0	0	0	0	0	0	(\$237)
4	Interest	0	0	(50)	(189)	0	(11)	(63)	0	0	0	0	0	(219)	(0)	(132)	(\$666)
5	Schedule M Differences	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
6	State Taxable Income	\$54	\$55	\$190	\$358	\$136	\$664	\$140	\$222	\$63	\$18	\$82	\$234	\$219	\$19	\$132	\$2,587
7	Add OR Depletion Adjustment-Net	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
8	Total State Taxable Income	\$54	\$55	\$190	\$358	\$136	\$664	\$140	\$222	\$63	\$18	\$82	\$234	\$219	\$19	\$132	\$2,587
9	State Income Tax	\$4	\$4	\$13	\$24	\$9	\$44	\$9	\$15	\$4	\$1	\$5	\$15	\$14	\$1	\$9	\$171
10	State Tax Credits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
11	Net State Income Tax	\$4	\$4	\$13	\$24	\$9	\$44	\$9	\$15	\$4	\$1	\$5	\$15	\$14	\$1	\$9	\$171
12	Additional Tax Depreciation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
13	Other Schedule M Differences	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
14	Federal Taxable Income	\$50	\$51	\$177	\$334	\$127	\$620	\$131	\$207	\$59	\$17	\$77	\$219	\$205	\$18	\$123	\$2,416
15	Federal Tax @ 35%	18	18	62	117	44	217	46	72	21	6	27	76	72	6	43	\$845
16	Federal Tax Credits	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
17	Current Federal Tax	\$18	\$18	\$62	\$117	\$44	\$217	\$46	\$72	\$21	\$6	\$27	\$76	\$72	\$6	\$43	\$845
18	ITC Adjustment																\$0
19	Deferral	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
20	Restoration	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
21	Total ITC Adjustment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
22	Provision for Deferred Taxes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	\$0
23	Total Income Tax	\$22	\$22	\$75	\$141	\$53	\$261	\$55	\$87	\$25	\$7	\$32	\$91	\$86	\$7	\$52	\$1,016

Avista Utilities
UG 186
Tax Calculation
Twelve Months Ended December 31, 2010
(\$000)

Income Tax Calculations	0 Per Company Filing (1)	Adjustments (2)	0 Adjusted (3)	Required Change for Reasonable Return (4)	Results at Reasonable Return (5)
1 Book Revenues	\$122,952	\$451	\$123,403	\$8,750	\$132,153
2 Book Expenses Other than Depreciation	112,583	(1,233)	111,349	212	111,561
3 State Tax Depreciation	5,499	(237)	5,262	0	5,262
4 Interest	4,874	(666)	4,208	0	4,208
5 Less: Schedule M Differences	184	0	184	0	184
6 State Taxable Income	<u>(\$188)</u>	<u>\$2,587</u>	<u>\$2,400</u>	<u>\$8,538</u>	<u>\$10,938</u>
7 Add OR Depletion Adjustment					
8 Total State Taxable Income	<u>(\$188)</u>	<u>\$2,587</u>	<u>\$2,400</u>	<u>\$8,538</u>	<u>\$10,938</u>
9 State Income Tax @ 6.60%	(\$12)	\$171	\$159	\$564	\$723
10 State Tax Credits	0	0	0	0	0
11 Net State Income Tax	<u>(\$12)</u>	<u>\$171</u>	<u>\$159</u>	<u>\$564</u>	<u>\$723</u>
12 Additional Tax Depreciation	0	0	0	0	0
13 Plus: Other Schedule M Differences	0	0	0	0	0
14 Federal Taxable Income	<u>(\$176)</u>	<u>\$2,416</u>	<u>\$2,241</u>	<u>\$7,974</u>	<u>\$10,215</u>
15 Federal Tax @ 35%	(61)	845	784	2,791	3,575
16 Federal Tax Credits	0	0	0	0	0
17 Current Federal Tax	<u>(\$61)</u>	<u>\$845</u>	<u>\$784</u>	<u>\$2,791</u>	<u>\$3,575</u>
18 ITC Adjustment					
19 Deferral	0	0	0	0	0
20 Less: Amortization	0	0	0	0	0
21 Total ITC Adjustment	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>
22 Provision for Deferred Taxes	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>	<u>\$0</u>
23 Total Income Tax	<u>(\$73)</u>	<u>\$1,016</u>	<u>\$943</u>	<u>\$3,355</u>	<u>\$4,298</u>

Avista Utilities
 UG 186
 Revenue Sensitive Costs and Cost of Capital
 Twelve Months Ended December 31, 2010
 (\$000)

REVENUE SENSITIVE COSTS	
Revenues	1.00000
Operating Revenue Deductions	
Uncollectible Accounts	0.00609
Taxes Other - Franchise	0.02110
- Oregon Commission Fees	0.00250
- Resource supplier	0.00069
State Taxable Income	<u>0.96963</u>
State Income Tax	<u>0.06400</u>
Federal Taxable Income	<u>0.90563</u>
Federal income Tax @ 35%	<u>0.31697</u>
ITC	
Current FIT	<u>0.31697</u>
Other	
Total Excise Taxes	<u>0.38097</u>
Total Revenue Sensitive Costs	<u>0.41134</u>
Utility Operating Income	<u>0.58866</u>
Net-to-Gross Factor	<u>1.69877</u>

COST OF CAPITAL SETTLED	% of CAPITAL	COST	WEIGHTED COST
Long Term Debt	50.0%	6.28%	3.14%
Preferred Stock	0.0%	0.00%	0.00%
Common Equity	50.0%	10.10%	5.05%
Total	<u>100.0%</u>		<u>8.19%</u>

COST OF CAPITAL FILED	% of CAPITAL	COST	WEIGHTED COST
Long Term Debt	48.55%	6.80%	3.30%
Preferred Stock	0.00%	0.00%	0.00%
Common Equity	51.45%	11.00%	5.66%
Total	<u>100.00%</u>		<u>8.96%</u>

Avista Utilities
Docket No. UG 186
Oregon - Natural Gas
Settlement Rate Spread

Line No.	OREGON TOTAL	Residential Service SCH 410	General Service SCH 420	Large General Service SCH 424	Interruptible Service SCH 440	Seasonal Service SCH 444	Special Contract Service SCH 447	Transportation Service SCH 456	
1	CURRENT REVENUE	\$ 123,321,253	\$ 74,355,807	\$ 36,342,651	\$ 4,876,152	\$ 5,143,278	\$ 217,070	\$ 403,670	\$ 1,982,625
2	COST OF GAS	\$ 92,135,936	\$ 53,594,273	\$ 29,320,596	\$ 4,387,386	\$ 4,635,274	\$ 198,407	\$ -	\$ -
3	CURRENT MARGIN	\$ 31,185,317	\$ 20,761,534	\$ 7,022,055	\$ 488,766	\$ 508,004	\$ 18,663	\$ 403,670	\$ 1,982,625
4	% of Current Margin excl Sch 447	100.00%	67.45%	22.81%	1.59%	1.65%	0.06%		6.44%
5	Total Revenue Requirement	\$ 8,750,000							
6	Revenue Requirement as a Percent of Margin Revenue	28.06%							
7	Staff Proposed Percentage of Overall Margin Increase		98.36%	124.00%	95.00%	55.00%	130.00%		65.00%
8	Increase as a Percent of Total Current Margin		27.60%	34.79%	26.66%	15.43%	36.48%		18.24%
9	PROPOSED MARGIN REVENUE INCREASE	\$ 8,750,000	\$ 5,729,816	\$ 2,443,114	\$ 130,281	\$ 78,395	\$ 6,807		\$ 361,586
10	Percentage Revenue Increase	7.10%	7.71%	6.72%	2.67%	1.52%	3.14%		18.24%

**Avista Utilities
Docket No. UG 186
Oregon - Natural Gas
Settlement Rates By Schedule**

<u>Present Rates</u>	<u>Change</u>	<u>Proposed Rates</u>
Residential Service Schedule 410		
\$6.00 Customer Charge	\$0.50/month	\$6.50 Customer Charge
All Therms - \$1.36785/Therm	\$0.10462/therm	All Therms - \$1.47247/Therm
General Service Schedule 420		
\$8.00 Customer Charge	\$0.50/month	\$8.50 Customer Charge
All Therms - \$1.29272/Therm	\$0.08709/therm	All Therms - \$1.37981/Therm
Large General Service Schedule 424		
\$46.00 Customer Charge	\$2.00/month	\$48.00 Customer Charge
All Therms - \$1.18131/Therm	\$0.03134/therm	All Therms - \$1.21265/Therm
Interruptible Service Schedule 440		
All Therms - \$0.89041/Therm	\$0.01357/therm	All Therms - \$0.90398/Therm
Seasonal Service Schedule 444		
All Therms - \$1.17586/Therm	\$0.03688/therm	All Therms - \$1.21274/Therm
Transportation Service Schedule 456		
\$187.50 Customer Charge	\$62.50/month	\$250.00 Customer Charge
1st 10,000 Therms - \$0.13148/Therm	\$0.02318/therm	1st 10,000 Therms - \$0.15466/Therm
Next 20,000 Therms - \$0.07906/Therm	\$0.01394/therm	Next 20,000 Therms - \$0.09300/Therm
Next 20,000 Therms - \$0.06496/Therm	\$0.01145/therm	Next 20,000 Therms - \$0.07641/Therm
Next 200,000 Therms - \$0.05080/Therm	\$0.00896/therm	Next 200,000 Therms - \$0.05976/Therm
Over 250,000 Therms - \$0.02568/Therm	\$0.00453/therm	Over 250,000 Therms - \$0.03021/Therm