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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION) CASE NO. AVU-E-12-08
OF AVISTA CORPORATION FOR THE) CASE NO. AVU-G-12-07
AUTHORITY TO INCREASE ITS RATES)
AND CHARGES FOR ELECTRIC AND)
NATURAL GAS SERVICE TO ELECTRIC AND) DIRECT TESTIMONY
NATURAL GAS CUSTOMERS IN THE STATE) OF
OF IDAHO) MARK THIES
)

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

1 I. INTRODUCTION

2 Q. Please state your name, business address, and
3 present position with Avista Corp.

4 A. My name is Mark Thies. My business address is
5 1411 East Mission Avenue, Spokane, Washington. I am
6 employed by Avista Corporation as Senior Vice President
7 and Chief Financial Officer.

8 Q. Would you please describe your education and
9 business experience?

10 A. I received a Bachelor of Arts degree in 1986,
11 with majors in Accounting and Business Administration from
12 Saint Ambrose College in Davenport, Iowa, and became a
13 Certified Public Accountant in 1987. I have extensive
14 experience in finance, risk management, accounting and
15 administration within the utility sector.

16 I joined Avista in September of 2008 as Senior Vice
17 President and Chief Financial Officer (CFO). Prior to
18 joining Avista, I was Executive Vice President and CFO for
19 Black Hills Corporation, a diversified energy company,
20 providing regulated electric and natural gas service to
21 areas of South Dakota, Wyoming and Montana. I joined
22 Black Hills Corporation in 1997 upon leaving InterCoast
23 Energy Company in Des Moines, Iowa, where I was the

1 manager of accounting. Previous to that I was a senior
2 auditor for Arthur Andersen & Co. in Chicago, Illinois.

3 **Q. What is the scope of your testimony in this**
4 **proceeding?**

5 A. I will provide a financial overview of the
6 Company and will explain the overall rate of return
7 proposed by the Company in this filing for its electric
8 and natural gas operations. The proposed rate of return
9 is derived from Avista's total cost of long-term debt and
10 common equity, weighted in proportion to the proposed
11 capital structure.

12 I will address the proposed capital structure, as
13 well as the proposed cost of total debt and equity in this
14 filing. Dr. Avera, on behalf of the Company, will provide
15 additional testimony related to the appropriate return on
16 equity for Avista, based on the specific circumstances of
17 the Company, together with the current state of the
18 financial markets.

19 In brief, I will provide information that shows:

- 20 • Avista's plans call for significant capital
21 expenditure requirements for the utility over
22 the next two years to assure reliability in
23 serving our customers and meeting customer
24 growth. Capital expenditures of approximately
25 \$500 million are planned for 2012 and 2013 to
26 fund customer growth, investment in generation
27 upgrades and transmission and distribution
28 facilities, as well as necessary maintenance and

1 replacements of our natural gas utility systems.
2 Capital expenditures of approximately \$1.2
3 billion are planned for the five-year period
4 ending December 31, 2016. Avista needs adequate
5 cash flow from operations to fund these
6 requirements, together with access to capital
7 from external sources under reasonable terms.
8

- 9 • Avista's corporate credit rating from Standard &
10 Poor's (S&P) is currently BBB and from Moody's
11 Investors Service (Moody's) it is Baa2. Avista
12 must operate at a level that will support a
13 solid investment grade corporate credit rating
14 in order to access capital markets at reasonable
15 rates, which will result in lower long-term
16 borrowing costs to customers. A supportive
17 regulatory environment is an important
18 consideration by the rating agencies when
19 reviewing Avista. Maintaining solid credit
20 metrics and credit ratings will also help
21 support a stock price necessary to issue equity
22 under reasonable terms to fund capital
23 requirements.
24
- 25 • The Company is proposing an overall rate of
26 return of 8.46%, including a 50.0% equity ratio
27 and a 10.90% return on equity. Our proforma
28 cost of debt is 6.02%.

29
30 The Company's ongoing efforts to carefully manage its
31 operating costs and capital expenditures are an important
32 part of our performance, but are not sufficient without
33 revenues from the general rate request for our electric
34 and natural gas businesses in these cases. Sufficient
35 cash flows from operations can only be achieved with the
36 support of regulators in allowing the timely recovery of
37 costs and the ability to earn a reasonable return on
38 investment.

1 A table of contents for my testimony is as follows:

2	<u>Description</u>	<u>Page</u>
3	I. Introduction	1
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8	VI. Cost of Debt	26
9	VII. Cost of Common Equity	27

10

11 **Q. Are you sponsoring any exhibits with your direct**
12 **testimony?**

13 A. Yes. I am sponsoring Exhibit 2, Schedule 1,
14 pages 1 through 5, and confidential Exhibit 2, Schedule 2,
15 which were prepared under my direction. Avista's credit
16 ratings by S&P and Moody's are summarized on page 1 of
17 Exhibit 2, Schedule 1, and Avista's actual capital
18 structure at June 30, 2012, and pro forma capital
19 structure at December 31, 2013 are included in Exhibit 2,
20 Schedule 1, page 2. Supporting information is included on
21 pages 2, 3 and 4, of Exhibit 2, Schedule 1 and
22 confidential Exhibit 2, Schedule 2.

23

24

II. FINANCIAL OVERVIEW

25

Q. Please provide an overview of Avista's financial
26 **situation.**

1 A. We are working to assure there are adequate
2 funds for operations, capital expenditures and debt
3 maturities. We have extended the weighted average
4 maturity of long-term debt while maintaining the overall
5 cost of long-term debt. During 2010, 2011 and 2012, the
6 Company priced and issued long-term debt at historically
7 low rates.

8 We obtain a portion of our capital requirements
9 through issuing common equity. In 2011, we issued \$26.5
10 million of equity and in 2010, we issued \$46.2 million.
11 We are planning to issue up to \$45 million of common stock
12 in 2012, in order to maintain our capital structure at an
13 appropriate level for our business.

14 We are anticipating the cost of debt to rise slightly
15 to 6.02% by December 31, 2013, from 5.94% as of June 30,
16 2012. This increase is primarily due to the forecasted
17 2013, thirty year issuance of \$90 million secured bonds,
18 of which a portion of the proceeds will be used to
19 refinance the three year, 1.68%, \$50 million secured bonds
20 maturing in 2013 (originally issued in 2010).

21 The Company entered into forward-starting interest
22 rate swaps for a total of \$160 million as a hedge on a
23 portion of the interest payments on forecasted issuances
24 of long-term debt in 2013, 2014 and 2015. The Company

1 continues to analyze the possibility of entering into
2 additional transactions in order to lock in the interest
3 rate on forecasted debt issuances to mitigate interest
4 rate risk.

5 Additionally, the Company filed a finance application
6 with the Commission to support the issuance of future debt
7 issuances. The Commission approved this application in
8 Order No. 32338. This order provides support for the \$90
9 million debt securities forecasted to be issued in 2013.

10 **Q. In addition to having credit ratings that will**
11 **allow Avista to attract debt capital under reasonable**
12 **terms, is it also necessary to attract capital from equity**
13 **investors?**

14 A. It is absolutely essential. Avista has two
15 primary sources of external capital: debt and equity
16 investors. As of June 30, 2012, Avista had approximately
17 \$2.4 billion of debt and equity. Approximately half of
18 that investment is funded by debt holders, and the other
19 half is funded by equity investors and retained earnings.
20 There tends to be significant emphasis on maintaining
21 credit metrics and credit ratings that will provide access
22 to debt capital under reasonable terms, however, access to
23 equity capital is equally important. In fact, equity
24 investors also focus on cash flows, capital structure and

1 liquidity, as do debt investors. The level of common
2 equity in the Company's capital structure can have a
3 direct impact on its credit rating.

4 Additional equity capital generally comes in two
5 forms: retained earnings and new stock issuances. Retained
6 earnings represent the annual earnings (return on equity)
7 of the Company that is not paid out to investors in
8 dividends. The retained earnings are reinvested by the
9 Company in utility capital expenditures to serve customers
10 and other capital/investments, which avoids the need to
11 issue new debt or new stock. Occasionally, it's necessary
12 to issue common equity in order to maintain a balanced
13 debt and equity capital structure. A balanced capital
14 structure allows Avista access to both debt and equity
15 markets under reasonable terms, on a sustainable basis.
16 As previously noted, our capital requirements for the next
17 five years are sizable at approximately \$1.2 billion,
18 which will need to be funded with both debt and equity.

19 **Q. Are the debt and equity capital markets a**
20 **competitive market?**

21 A. Yes. Our ability to attract new capital,
22 especially equity capital, under reasonable terms is
23 dependent on our ability to offer a risk/reward
24 opportunity that is better than the equity investors'

1 other alternatives. We are competing with not only other
2 utilities, but businesses in other sectors of the economy.
3 Demand for the stock supports the stock price, which
4 provides the opportunity to issue additional stock under
5 reasonable terms to fund capital investment requirements.

6 To the extent that the equity investor holds a
7 diversified portfolio of companies that includes utilities
8 and other energy companies, we would be competing with
9 those companies to attract those equity dollars.

10 **Q. What is Avista doing to attract equity**
11 **investment?**

12 A. Avista is carrying a capital structure that
13 provides the opportunity to have financial metrics that
14 offer a risk/reward proposition that is competitive and/or
15 attractive for equity holders.

16 We have steadily increased our dividend for common
17 shareholders over the past several years, to work toward a
18 dividend payout ratio that is comparable to other
19 utilities in the industry. This is an essential element
20 in providing a competitive risk/reward opportunity for
21 equity investors.

22 We are employing tracking mechanisms such as the
23 Power Cost Adjustment (PCA) and Purchased Gas Adjustment
24 (PGA), approved by the Idaho Public Utilities Commission

1 (the Commission), to balance the risk of owning and
2 operating the business in a manner that places us in a
3 position to offer a risk/reward opportunity that is
4 competitive with not only other utilities, but with
5 businesses in other sectors of the economy.

6 Dr. Avera provides additional testimony related to
7 the appropriate return on equity for Avista that would
8 allow the Company access to equity capital under
9 reasonable terms, and on a sustainable basis.

10

11

III. CREDIT RATINGS

12 **Q. How important are credit ratings for Avista?**

13 A. Utilities require ready access to capital
14 markets in all types of economic environments. The nature
15 of our business with long-term capital projects, our
16 obligation to serve, and the potential for significant
17 volatility in fuel and purchased power markets,
18 necessitates the need to have the ability to go to the
19 financial markets under reasonable terms on a regular
20 basis. In order to have this ability, investors need to
21 understand the risks related to any of their investments.
22 To help investors assess the creditworthiness of a
23 company, Nationally Recognized Statistical Rating
24 Organizations (rating agencies) developed their own

1 standardized ratings scale, otherwise known as credit
2 ratings. These credit ratings indicate the
3 creditworthiness of a company and assist investors in
4 determining if they want to invest in a Company.

5 **Q. Please summarize the credit ratings for Avista's**
6 **debt securities.**

7 A. Two of the most widely recognized rating
8 agencies are S&P and Moody's. Avista has credit ratings
9 assigned by both S&P and Moody's. Avista's credit ratings
10 are summarized on page 1 of Exhibit 2, Schedule 1.

11 **Q. Please explain the implications of the credit**
12 **ratings in terms of the Company's ability to access**
13 **capital markets.**

14 A. Credit ratings impact investor demand and
15 expected returns. More specifically, when the Company
16 issues debt, the credit rating can affect the
17 determination of the interest rate at which the debt will
18 be issued. The credit rating can affect the type of
19 investor who will be interested in purchasing the debt.
20 For each type of investment a potential investor could
21 make, the investor looks at the quality of that investment
22 in terms of the risk they are taking and the priority they
23 would have for payment of principal and interest in the
24 event that the organization experiences severe financial

1 stress. Investment risks include, but are not limited to,
2 liquidity risk, market risk, operational risk, and credit
3 risk. These risks are considered by the rating agencies
4 and investors in assessing our creditworthiness.

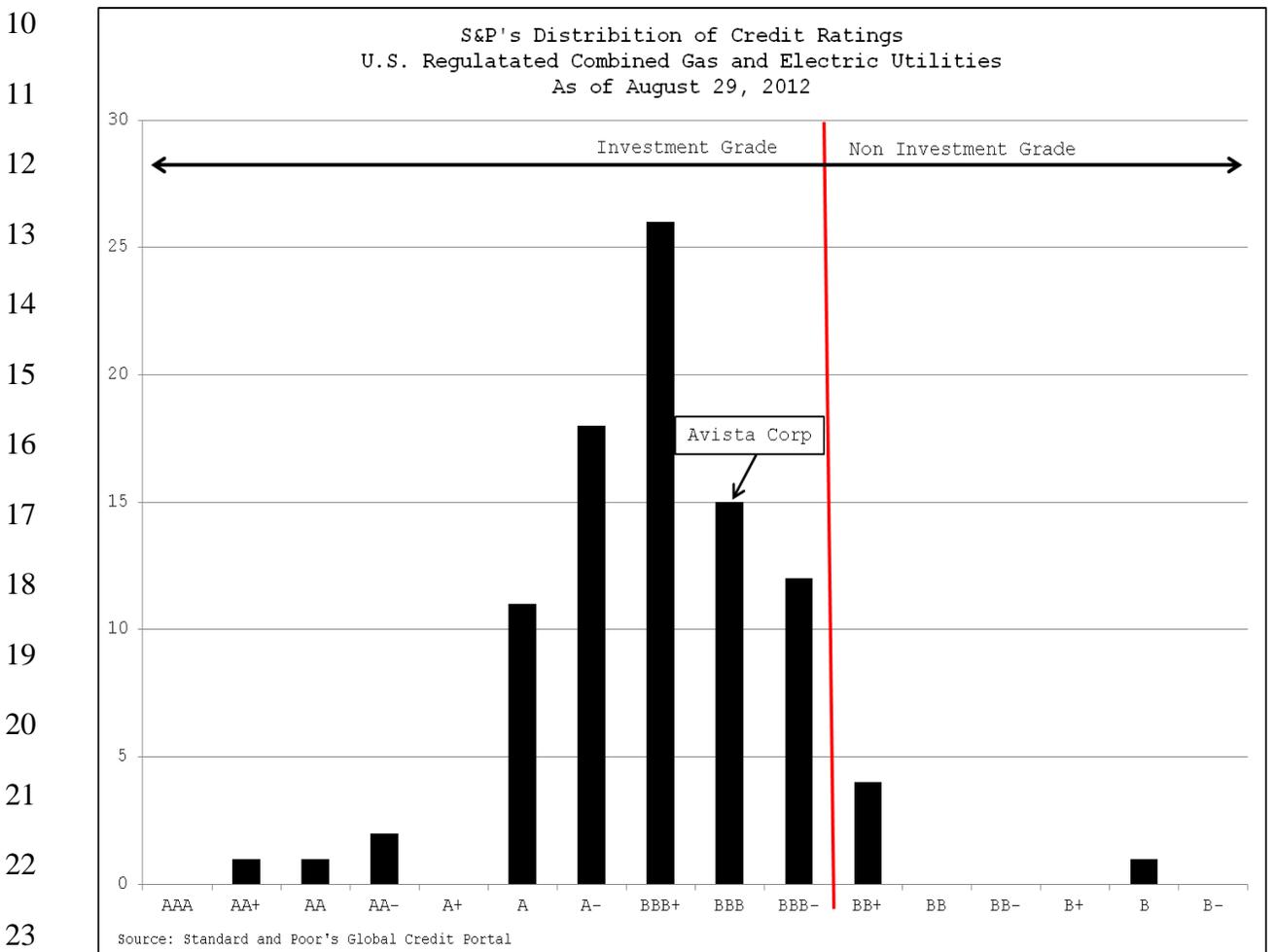
5 In challenging credit markets, where investors are
6 less likely to buy corporate bonds (as opposed to U.S.
7 Government bonds), a higher credit rating will attract
8 more investors, and a lower credit rating could reduce or
9 eliminate the number of potential investors. Thus, lower
10 credit ratings may result in a company having more
11 difficulty accessing financial markets and/or incur
12 significantly higher costs when accessing capital.

13 **Q. What credit rating does Avista Corporation**
14 **believe is appropriate?**

15 A. The move to investment grade for Avista was a
16 significant step in improving the Company's ability to
17 access capital at a reasonable cost. It took
18 approximately six years for the Company to regain its
19 investment grade rating from S&P and Moody's after it was
20 downgraded during the Energy Crisis. The difference
21 between investment grade and non-investment grade is not
22 only a matter of debt pricing, but also the ability to
23 access markets.

1 As shown in Illustration No. 1, Avista's current S&P
 2 corporate credit rating of BBB, is below the average
 3 credit rating for U.S. Regulated Combined Gas and Electric
 4 Utilities. The Company's long-term goal is to operate at
 5 a credit rating of at least the utility average (BBB+).
 6 Operating at a BBB+ would likely attract additional
 7 investors, lower the Company's debt pricing, and makes us
 8 more competitive with other utilities.

9 **Illustration No. 1:**



1 Financially healthy utilities have lower financing costs
2 which, in turn, benefit customers. In addition,
3 financially healthy utilities are better able to invest in
4 the required infrastructure over time to serve their
5 customers, and to withstand the challenges facing the
6 industry.

7 **Q. What are the key credit factors S&P uses to**
8 **establish credit ratings?**

9 A. Credit factors utilized by S&P to establish
10 credit ratings typically include an assessment of a
11 company's Business Risk and Financial Risk. The Business
12 Risk includes such items as country risk, industry risk,
13 competitive position, and profitability. The Business
14 Risk analysis is supported by statistics; however, it also
15 involves subjective judgment. S&P assigns a Business Risk
16 profile to each company that may range from the lowest of
17 "Vulnerable" to the highest of "Excellent". Avista's
18 Business risk profile is currently Excellent.

19 Financial risk is assessed primarily through
20 quantitative means. S&P's financial ratio benchmarks used
21 to rate companies such as Avista are set forth in
22 Illustration No. 2 below.

1 **Illustration No. 2:**

Standard & Poor's Financial Risk Indicative Ratios (Corporate)		
Financial Risk	FFO/Debt (%)	Debt/Capital (%)
Minimal	Greater than 60	Less than 25
Modest	45 - 60	25 - 35
Intermediate	30 - 45	35 - 45
Significant	20 - 30	45 - 50
Aggressive	12 - 20	50 - 60
Highly leveraged	Less than 12	Greater than 60
Company's Ratios:		
Avista Adjusted (a)	18.60%	54.70%
(a) Calculated as of 06/30/12 based on last known S&P methodology		

2

3 The ratios above are utilized to determine the
4 financial risk profile. Currently, Avista is in the
5 Aggressive category. The financial risk category along
6 with the business risk profile is then utilized in
7 Illustration No. 3 below to determine a company's rating.
8 S&P currently has Avista's corporate credit rating as BBB,
9 based upon an Aggressive financial risk profile and
10 Excellent business risk profile.

1 **Illustration No. 3:**

Standard & Poor's Business and Financial Risk Profile Matrix						
Business Risk Profile	Financial Risk Profile					
	Minimal	Modest	Intermediate	Significant	Aggressive	Highly Leveraged
Excellent	AAA	AA	A	A-	BBB	--
Strong	AA	A	A-	BBB	BB	BB-
Satisfactory	A-	BBB+	BBB	BB+	BB-	B+
Fair	--	BBB-	BB+	BB	BB-	B
Weak	--	--	BB	BB-	B+	B-
Vulnerable	--	--	--	B+	B	CCC+

2

3

4 Moody's uses a similar methodology to analyze and
5 determine utility credit ratings.

6 **Q. Please describe how S&P's Financial Risk ratios**
7 **are calculated and what they mean?**

8 A. The first ratio, Funds from operations/total
9 debt (%), calculates the amount of cash flow from
10 operations as a percent of total debt. The ratio
11 indicates the company's ability to fund debt obligations.
12 The second ratio, Total debt/total capital (%), is the
13 amount of debt in our total capital structure. The ratio
14 is an indication of the extent to which the company is
15 using debt to finance its operations. S&P looks at many
16 other financial ratios; however, these are the two most

1 important ratios they use when analyzing our financial
2 profile.

3 **Q. Do rating agencies make adjustments to the**
4 **financial ratios that are calculated directly from the**
5 **financial statements of the Company?**

6 A. Yes. Rating agencies make adjustments to debt
7 to factor in off-balance sheet commitments (e.g.,
8 purchased power agreements and the unfunded status of
9 pension and other post-retirement benefits) that
10 negatively impact the ratios. For example, in 2011 S&P
11 made adjustments to Avista's debt totaling approximately
12 \$148 million primarily related to purchased power
13 contracts, post-retirement benefits, and non-recourse
14 debt. The adjusted financial ratios for Avista are
15 included in Illustration No. 2 above.

16 **Q. What other risks are Avista and the utility**
17 **sector facing that may impact credit ratings?**

18 A. Avista's credit ratings are impacted by risks
19 that could negatively affect the Company's cash flows.
20 These risks include, but are not limited to, weather
21 conditions, the effect of state and federal regulatory
22 decisions on the ability to recover costs and earn a
23 reasonable return, changes in wholesale energy prices,
24 local and global economic conditions, access to capital

1 markets at a reasonable cost, potential effects of
2 legislation or administrative rulemaking, volatility and
3 illiquidity in the wholesale energy market, and delays or
4 changes in construction costs.

5 Credit ratings for the utility sector are also
6 adversely impacted by large capital expenditures for new
7 generation, transmission and distribution facilities, and
8 environmental compliance. The utility sector is in a
9 cycle of significant capital spending, which will likely
10 be funded by significant issuances of debt and equity.
11 This will likely affect the competition for financial
12 capital.

13 The increased capital spending needs and resulting
14 increased debt and equity issuances make regulatory
15 support for full and timely recovery of prudently incurred
16 costs critical to the utility sector.

17 **Q. How important is the regulatory environment in**
18 **which a Company operates?**

19 A. The regulatory environment in which a company
20 operates is a major qualitative factor in determining a
21 company's creditworthiness.

22
23 S&P stated the following:

24 Regulation is the most critical aspect that
25 underlies regulated integrated utilities'

1 creditworthiness. Regulatory decisions can
2 profoundly affect financial performance. Our
3 assessment of the regulatory environments in
4 which a utility operates is guided by certain
5 principles, most prominently consistency and
6 predictability, as well as efficiency and
7 timeliness. For a regulatory process to be
8 considered supportive of credit quality, it must
9 limit uncertainty in the recovery of a utility's
10 investment. They must also eliminate, or at
11 least greatly reduce, the issue of rate-case
12 lag, especially when a utility engages in a
13 sizable capital expenditure program.¹

14 Due to the major capital expenditures planned by
15 Avista, a supportive regulatory environment is essential.

16

17

IV. CASH FLOW

18 **Q. What are the Company's sources to fund capital**
19 **requirements?**

20 A. The Company utilizes cash flow from operations,
21 long-term debt and common stock issuances to fund its
22 capital expenditures. Additionally, on an interim basis,
23 the Company utilizes its credit facility to fund capital
24 needs until longer-term financing can be obtained.

25 **Q. What are the Company's near-term capital**
26 **requirements?**

27 A. As a combined electric and natural gas utility,
28 capital will be required for investment in generation

¹ Standard and Poor's, Key Credit Factors: Business and Financial Risks in the Investor-owned Utilities Industry, March 2010.

1 upgrades, expansion and replacement of transmission and
2 distribution facilities, customer growth as well as
3 necessary upgrades and replacements of our natural gas
4 systems.

5 We have been making significant capital investments
6 in generation, transmission and distribution systems to
7 preserve and enhance service reliability for our customers
8 and replace aging infrastructure. Utility capital
9 expenditures were \$247.0 million for 2011.

10 The amount of capital expenditures planned for 2012-
11 2013 is approximately \$500 million, and over a five year
12 period ending December 31, 2016 approximately \$1.2
13 billion. Total average monthly rate base as of June 30,
14 2012, was \$2.2 billion; therefore, these planned capital
15 additions represent substantial new investments given the
16 relative size of the Company.

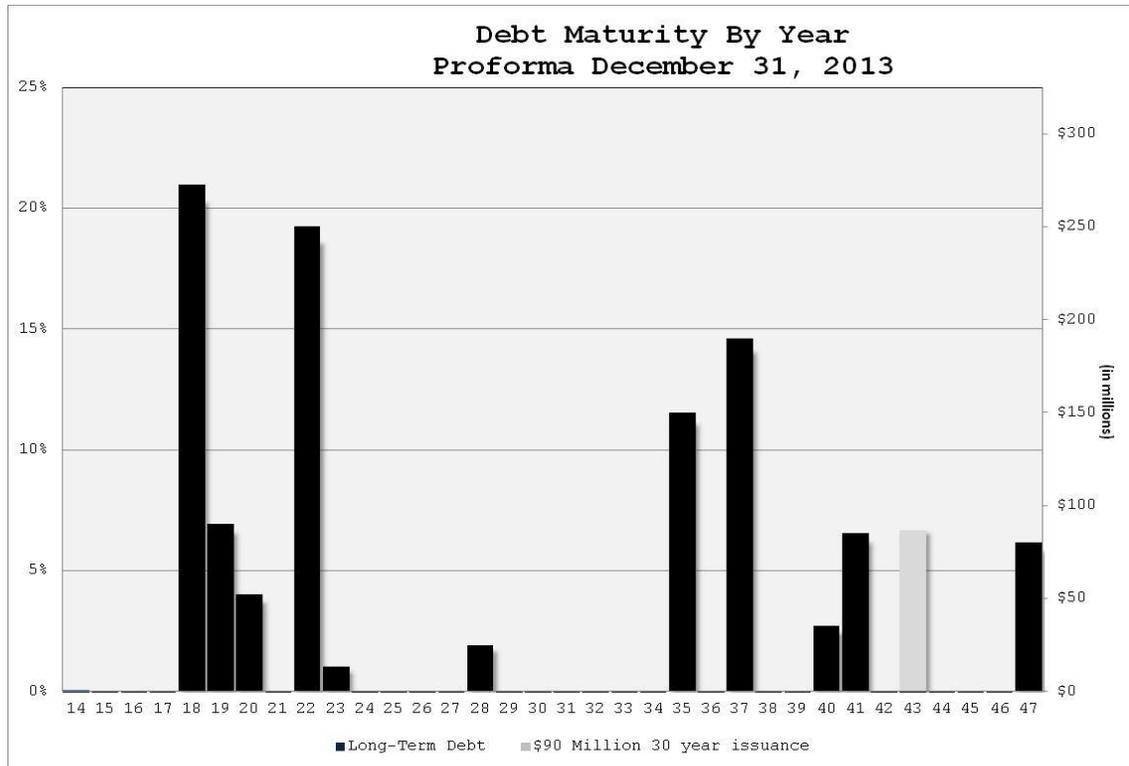
17 **Q. What are the Company's near-term plans related**
18 **to its debt?**

19 A. The Company finances its rate base assets with
20 long term debt and equity. As such, from time to time, we
21 need to access long-term capital markets in order to
22 finance these long-term assets as well as fund maturing
23 debt.

1 In November 2012, the Company will issue \$80.0
2 million of First Mortgage Bonds due in 2047. Additionally,
3 the Company is forecasting the issuance of \$90 million of
4 First Mortgage bonds in June 2013.

5 The Company has \$50.0 million of 1.68 percent First
6 Mortgage Bonds that mature in 2013. Illustration No. 4
7 below shows the amount of debt maturities by year
8 including the maturity date of the forecasted long-term
9 debt issuance:

10 **Illustration No. 4:**



11
12

13 Q. Is there pending legislation that may impact the
14 Company's collateral requirements?

1 A. Yes. The Dodd-Frank Wall Street Reform and
2 Consumer Protection Act (Dodd-Frank Act) was enacted into
3 law in July 2010. The Dodd-Frank Act establishes
4 regulatory jurisdiction by the Commodity Futures Trading
5 Commission (CFTC) and the Securities and Exchange
6 Commission (SEC) for certain swaps (which include a
7 variety of derivative instruments) and the users of such
8 swaps, that previously had been largely exempted from
9 regulation. The Dodd-Frank Act includes mandatory
10 clearing requirements for swaps, with certain
11 expectations. Avista uses derivative instruments to hedge
12 risks related to electric and natural gas commodities,
13 interest rates and foreign currency.

14 A variety of rules must be adopted by federal
15 agencies (including the CFTC, SEC and the FERC) to
16 implement the Dodd-Frank Act. These rules being developed
17 and implemented will clarify the impact of the Dodd-Frank
18 Act on the Company, which may be significant.

19 Under the Dodd-Frank Act, "Swap Dealers" and "Major
20 Swap Participants" generally will be required to collect
21 minimum initial and variation margin (cash collateral)
22 from their counterparties for non-cleared swaps, similar
23 to the margin required for swaps that are cleared on
24 exchanges. However, the requirement varies with the type

1 of counterparty and the regulator of the "Major Swap
2 Participant" or "Swap Dealer." The Company should be
3 categorized as a counterparty that is a non-financial end
4 user for the purposes of the Dodd-Frank Act, i.e., as a
5 non-financial entity that engages in derivatives to hedge
6 commercial risk.

7 On August 13, 2012, the CFTC and SEC issued final
8 rules regarding the definition of "swap" and various
9 exemptions from mandatory clearing. The final rules
10 indicate including how our use of derivatives to hedge
11 commercial risk could be exempt under the de minimis
12 threshold and/or the end-user criteria. These rules could
13 affect counterparties classified as Swap Dealers or Major
14 Swap Participants. Some of these parties have been active
15 in providing hedging instruments and may be forced out of
16 the market or elect to drop out because of the
17 restrictions on proprietary trading by financial
18 institutions. These final rules have effective dates
19 relevant to Avista starting in April 2013.

20 We will continue to monitor developments including
21 proposals to implementation of various aspects related to
22 the Act. We cannot predict the impact the Dodd-Frank Act
23 may ultimately have on our operations.

1 V. CAPITAL STRUCTURE

2 Q. What are Avista's plans regarding common equity
3 and why is this important?

4 A. Avista continuously monitors the common equity
5 ratio of its capital structure, and assesses the need to
6 issue additional common equity in order to maintain a
7 capital structure that is appropriate for our business.
8 In 2011, we issued \$26.5 million, and in 2010, we issued
9 \$46.2 million of common stock. In 2012, we plan to issue
10 up to \$45 million of common stock. It is important to the
11 rating agencies and investors for Avista to maintain a
12 balanced debt/equity ratio in order to minimize the risk
13 of default on required debt interest payments. Dr. Avera
14 notes that:

15 Utilities are facing energy market
16 volatility, rising cost structures, the need
17 to finance significant capital investment
18 plans, uncertainties over accommodating
19 economic and financial market uncertainties,
20 and ongoing regulatory risks. Taken
21 together, these considerations warrant a
22 stronger balance sheet to deal with an
23 increasingly uncertain environment. A more
24 conservative financial profile, in the form
25 of a higher common equity ratio, is
26 consistent with increasing uncertainties and
27 the need to maintain the continuous access
28 to capital under reasonable terms that is
29 required to fund operations and necessary
30 system investment, including times of
31 adverse capital market conditions. (Avera
32 Testimony, P. 27, ll. 12-22. P. 28, ll. 1-
33 2).

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In his testimony Dr. Avera concludes that the 50.0 percent common equity ratio is reasonable based on the following:

- Avista's requested capitalization is consistent with the Company's need to maintain its credit standing and financial flexibility as it seeks to raise additional capital to fund significant system investments and meet the requirements of its service territory;
- Avista's proposed common equity ratio is entirely consistent with the 49.0 percent and 50.1 percent average common equity ratios for the proxy utilities, based on year-end 2011 data and near-term expectations, respectively; and,
- The requested capitalization reflects the importance of an adequate equity layer to accommodate Avista's operating risks and the pressures of funding significant capital investments. This is reinforced by the need to consider the impact of uncertain capital market conditions, as well as off-balance sheet commitments such as purchased power agreements, which carry with them some level of imputed debt. (Avera Testimony, P. 7, ll. 28 through P. 8, ll. 2).

Q. Please explain the capital structure proposed by Avista in this case.

A. The proportionate shares of Avista Corp.'s pro forma capital structure are 50.0 percent common equity, and 50.0 percent long-term debt as shown on page 2 of Exhibit 2, Schedule 1. Additional details related to

1 adjustments are located in page 1 of confidential Exhibit
2 2, Schedule 2.

3

4

VI. COST OF DEBT

5

Q. How have you determined the cost of debt?

6

A. Cost of total long-term debt in the Company's
7 proposed capital structure includes forecasted and actual
8 weighted average long-term debt. As shown in Exhibit 2,
9 Schedule 1 page 2, the actual weighted average cost of
10 long-term debt outstanding on June 30, 2012 was 5.94%.
11 The size and mix of debt changes over time based upon the
12 actual financing completed. We have made certain pro
13 forma adjustments to update the debt cost through December
14 31, 2013. Pro forma adjustments to total long-term debt
15 reflect the issuance of new debt for the pro forma period.

16 We are anticipating the cost of debt to rise to 6.02%
17 as of December 31, 2013, from 5.94% as of June 30, 2012.
18 This increase is primarily due to the forecasted 2013,
19 thirty-year issuance of \$90 million secured bonds, of
20 which a portion of the proceeds will be used to refinance
21 the three-year, 1.68%, \$50 million first mortgage bonds
22 maturing in 2013 (originally issued in 2010).

1 VII. COST OF COMMON EQUITY

2 Q. What rate of return on common equity is the
3 Company proposing in this proceeding?

4 A. The Company is proposing a 10.90% return on
5 common equity (ROE), which falls essentially at the
6 midpoint of Dr. Avera's recommended range of required
7 return on equity. Dr. Avera testifies to analyses related
8 to the cost of common equity with an ROE range of 10.0% to
9 11.4% and 10.2% to 11.4% (after incorporating an
10 adjustment to account for the impact of common equity
11 flotation costs). In his testimony Dr. Avera states that:

12 My conclusion that a 10.9 percent ROE for
13 Avista is a reasonable estimate of
14 investors' required return is also
15 reinforced by the greater uncertainties
16 associated with Avista's relatively small
17 size and the fact that current cost of
18 capital estimates are likely to understate
19 investors' requirements at the time the
20 outcome of this proceeding becomes effective
21 and beyond. (Avera Testimony, at P.6, ll.
22 20-28)

23
24 If Avista can earn a 10.9% ROE, it would further
25 strengthen the Company's credit ratings ratios. Stronger
26 credit ratings ratios could lead to the Company's goal of
27 obtaining an upgrade to our corporate credit rating to
28 BBB+ from BBB.

29 Q. Please summarize the proposed capital structure
30 and the cost components for debt and common equity.

1 A. Illustration No. 5 below shows the capital
2 structure and cost components proposed by the Company.

3 **Illustration No. 5:**

AVISTA CORPORATION				
Forecasted Cost of Capital				
December 31, 2013				
	<u>Amount</u>	<u>Percent of Total Capital</u>	<u>Cost</u>	<u>Component</u>
Total Debt	\$ 1,333,000,000	50.00%	6.02%	3.01%
Total Equity	1,305,826,000	50.00%	10.90%	5.45%
Total	<u>\$ 2,638,826,000</u>	<u>100.00%</u>		<u>8.46%</u>

4

5 Q. Does that conclude your pre-filed direct
6 testimony?

7 A. Yes.

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION) CASE NO. AVU-E-12-08
OF AVISTA CORPORATION FOR THE) CASE NO. AVU-G-12-07
AUTHORITY TO INCREASE ITS RATES)
AND CHARGES FOR ELECTRIC AND)
NATURAL GAS SERVICE TO ELECTRIC) Exhibit No. 2
AND NATURAL GAS CUSTOMERS IN THE)
STATE OF IDAHO) MARK T. THIES
)

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

AVISTA CORPORATION
Long-term Securities Credit Ratings

	Standard & Poor's		Moody's
Last Upgraded	March/August 2011 ⁽¹⁾		March 2011
Credit Outlook	Stable		Stable
A+		A1	
A		A2	
A-	First Mortgage Bonds Secured Medium-Term Notes	A3	First Mortgage Bonds Secured Medium-Term Notes
BBB+		Baa1	
BBB	Avista Corp./Corporate rating	Baa2	Avista Corp./Issuer rating
BBB-		Baa3	
INVESTMENT GRADE			
BB+	Trust-Originated Preferred Securities	Ba1	Trust-Originated Preferred Securities
BB		Ba2	
BB-		Ba3	

(1) The Company received an upgrade to its Corporate credit rating in March 2011 and to its First Mortgage Bonds in August 2011

AVISTA CORPORATION				
Forecasted Cost of Capital ^A				
December 31, 2013				
	Amount	Percent of Total Capital	Cost	Component
Total Debt	\$ 1,333,000,000	50.00% ^B	6.02%	3.01%
Total Equity	1,305,826,000	50.00% ^B	10.90%	5.45%
Total	<u>\$ 2,638,826,000</u>	<u>100.00%</u>		<u>8.46%</u>

AVISTA CORPORATION				
Embedded Cost of Capital				
June 30, 2012				
	Amount	Percent of Total Capital	Cost	Component
Total Debt	\$ 1,213,000,000	50.77%	5.94%	3.01%
Total Equity	1,176,206,894	49.23%	10.50% ^C	5.17%
TOTAL	<u>\$ 2,389,206,894</u>	<u>100.00%</u>		<u>8.18%</u>

Assumptions:

- A The Company's cost of capital was forecasted through 12-31-2013, based on the Company's internal forecast.
- B The Company's actual percentage of debt and equity is 50.5% and 49.5%, respectively. Consistent with prior regulatory filings the Company is filing a capital structure of 50% equity and 50% total debt.
- C The cost of equity used for the embedded cost of capital is based on the last known allowed return on equity approved by the Commission.

AVISTA CORPORATION
Forecasted Cost of Long-Term Debt Detail - Idaho
December 31, 2013

Line No.	Description	Coupon Rate	Maturity Date	Settlement Date	Principal Amount	Issuance Costs	SWAP Loss/(Gain)	Discount (Premium)	Loss/Reacq Expenses	Net Proceeds	Yield to Maturity	Outstanding 12/31/2013	Effective Cost	Line No.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(g)	(h)	(i)	(j)	(k)	(l)	(l)	No.
1	FMBS - SERIES A	7.530%	5/5/2023	5/6/1993	\$ 5,500,000	\$ 42,712	\$ -	\$ -	\$ 963,011	\$ 4,494,277	9.359%	\$ 5,500,000	\$ 514,744	1
2	FMBS - SERIES A	7.540%	5/5/2023	5/7/1993	\$ 1,000,000	\$ 7,766	\$ -	\$ -	\$ 175,412	\$ 816,822	9.375%	1,000,000	93,747	2
3	FMBS - SERIES A	7.390%	5/11/2018	5/11/1993	\$ 7,000,000	\$ 54,364	\$ -	\$ -	\$ 1,227,883	\$ 5,717,753	9.287%	7,000,000	650,114	3
4	FMBS - SERIES A	7.450%	6/11/2018	6/9/1993	\$ 15,500,000	\$ 120,377	\$ -	\$ 50,220	\$ 2,140,440	\$ 13,188,963	8.953%	15,500,000	1,387,715	4
5	FMBS - SERIES A	7.180%	8/11/2023	8/12/1993	\$ 7,000,000	\$ 54,364	\$ -	\$ -	\$ -	\$ 6,945,636	7.244%	7,000,000	507,064	5
6	Trust Preferred Securities	1.580% ¹	6/1/2037	6/3/1997	\$ 40,000,000	\$ 1,296,086	\$ -	\$ -	\$ (1,769,125)	\$ 40,473,039	1.540%	40,000,000	616,011	6
7	FMBS - SERIES B	6.370%	6/19/2028	6/19/1998	\$ 25,000,000	\$ 158,304	\$ -	\$ -	\$ 188,649	\$ 24,653,047	6.475%	25,000,000	1,618,863	7
8	FMBS SERIES 5.45%	5.450%	12/1/2019	11/18/2004	\$ 90,000,000	\$ 1,192,681	\$ -	\$ 239,400	\$ -	\$ 88,567,919	5.608%	90,000,000	5,047,001	8
9	FMBS SERIES - 6.25%	6.250%	12/1/2035	11/17/2005	\$ 150,000,000	\$ 1,812,935	\$ (4,445,000)	\$ 367,500	\$ -	\$ 152,264,565	6.139%	150,000,000	9,208,605	9
10	FMBS SERIES - 5.70%	5.700%	7/1/2037	12/15/2006	\$ 150,000,000	\$ 4,702,304	\$ 3,738,000	\$ 222,000	\$ -	\$ 141,337,696	6.120%	150,000,000	9,179,674	10
11	FMBS SERIES - 5.95%	5.950%	6/1/2018	4/2/2008	\$ 250,000,000	\$ 2,246,419	\$ 16,395,000	\$ 835,000	\$ -	\$ 230,523,581	7.034%	250,000,000	17,585,352	11
12	FMBS SERIES - 5.125%	5.125%	4/1/2022	9/22/2009	\$ 250,000,000	\$ 2,284,788	\$ (10,776,222)	\$ 575,000	\$ 2,875,817	\$ 255,040,618	4.907%	250,000,000	12,268,615	12
13	FMBS SERIES - 3.89%	3.890%	12/20/2020	12/20/2010	\$ 52,000,000	\$ 383,338	\$ -	\$ -	\$ 6,273,664	\$ 45,342,997	5.578%	52,000,000	2,900,325	13
14	FMBS SERIES - 5.55%	5.550%	12/20/2040	12/20/2010	\$ 35,000,000	\$ 258,834	\$ -	\$ -	\$ 5,263,822	\$ 29,477,345	6.788%	35,000,000	2,375,887	14
15	FMBS SERIES - 4.45%	4.450%	12/14/2041	12/14/2011	\$ 85,000,000	\$ 692,722	\$ 10,557,000	\$ -	\$ -	\$ 73,750,278	5.340%	85,000,000	4,538,863	15
16	FMBS SERIES - 4.23%	4.230%	11/29/2047	11/30/2012	\$ 80,000,000	\$ 600,000 ²	\$ 18,546,870	\$ -	\$ 104,292	\$ 60,748,838	5.854%	80,000,000	4,683,510	16
17	Forecasted FMBS Issuance	5.500%	6/15/2043	6/15/2013	\$ 90,000,000	\$ 675,000 ²	\$ -	\$ -	\$ -	\$ 89,325,000	5.552%	90,000,000	4,996,461	17
18												1,333,000,000	78,172,554	18
19														19
20	Repurchase	3 7.74%	12/31/2017	6/30/2006	\$ 6,875,000				\$ 483,582	\$ 6,391,418	8.721%		4 70,127	20
21	Repurchase	3 8.17%	6/30/2015	6/30/2005	\$ 26,000,000				\$ 1,700,371	\$ 24,299,629	9.184%		4 267,096	21
22	Repurchase	3 8.41%	6/30/2014	6/30/2004	\$ 36,590,000				\$ 7,244,895	\$ 29,345,105	11.840%		4 1,273,854	22
23	Repurchase	3 5.72%	3/1/2034	12/30/2009	\$ 17,000,000				\$ 1,957,496	\$ 15,042,504	6.683%		4 163,206	23
24	Repurchase	3 6.55%	10/1/2032	12/31/2008	\$ 66,700,000				\$ 3,709,755	\$ 62,990,245	7.034%		4 324,413	24
25	IDAHO TOTAL DEBT OUTSTANDING AND COST OF DEBT AT December 31, 2013											\$ 1,333,000,000	\$ 80,271,250	25
26														26
27									Adjusted Weighted Average Cost of Debt		6.02%			27
28														28
29														29
30 ¹	Average monthly average rate over a twelve month period													30
31 ²	Estimated issuance costs													31
32 ³	Coupon Rate at the time of repurchase													32
33 ⁴	Calculated using the internal rate of return method													33
34														34

AVISTA CORPORATION
 Cost of Long-Term Variable Rate
 December 31, 2013

	Dec-12	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Avg of
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)
Long-Term Debt Variable Rate	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$40,000,000	\$ 40,000,000
Number of Days in Month		31	28	31	30	31	30	31	31	30	31	30	31	
Forecasted Rates*		1.53%	1.53%	1.53%	1.55%	1.55%	1.55%	1.56%	1.56%	1.56%	1.60%	1.60%	1.60%	1.58%
Long-Term Debt Variable Rate - Interest Expense	\$	52,576	\$ 47,488	\$ 52,576	\$ 51,506	\$ 53,223	\$ 51,506	\$ 53,733	\$ 53,733	\$ 52,000	\$ 55,111	\$ 53,333	\$ 55,111	\$ 631,897

*Forecasted Rates are based on the Company's internal forecast

AVISTA CORPORATION
 Capital Structure Reconciliation
 (dollars in thousands)

	10-Q			Regulatory		Regulatory
	06/30/2012	Adjustments		Balance	Forecasted	Balance
				6/30/2012	activity	12/31/2013
Long-term Debt						
Long-term debt	\$ 1,147,765	\$ 25,235	A	\$ 1,173,000	\$ 120,000	E \$ 1,293,000
Current Portion of long-term debt	423	(423)	B	-	-	-
Debt to Affiliated Trust	51,547	(11,547)	C	40,000	-	40,000
Total long-term debt	<u>\$ 1,199,735</u>	<u>\$ 13,265</u>		<u>\$ 1,213,000</u>	<u>\$ 120,000</u>	<u>\$ 1,333,000</u>

Equity

Total Avista Corporation stockholders' equity	<u>\$ 1,216,842</u>	<u>\$ (40,635)</u>	D	<u>\$ 1,176,207</u>	<u>\$ 129,619</u>	<u>F \$ 1,305,826</u>
---	---------------------	--------------------	---	---------------------	-------------------	-----------------------

- A These adjustments are made to reflect the Company's actual principal amount outstanding. The Company excludes amounts related to settled interest rate swaps and unamortized debt discount. These items are included as a cost of debt. Additionally, amounts related to capital leases are excluded from long-term debt.
- B Current portion of long-term debt excludes \$423,000, which primarily relates to capital leases and debt at the subsidiaries.
- C This adjustment reflects the \$11.547 million of these securities the Company currently holds. The \$40 million adjusted balance reflects the current outstanding balance to third party investors.
- D The Company excludes the following from equity: Capital Stock Expense - in order to recover the costs incurred for issuing equity, an amount equivalent to the actual debt outstanding at the Company's subsidiary Ecova, and accumulated other comprehensive loss - in order to reflect the Company's equity balance.

2012 Equity Adjustments (dollars in thousands):

Capital Stock Expense	\$ 14,278
Accumulated other comprehensive loss	5,158
Debt outstanding at Ecova	(60,071)
	<u>\$ (40,635)</u>

- E This represents the issuance of \$80 million of long-term debt in 2013, \$90 million of long-term debt in 2014, less \$50 million of long-term debt maturing in December 2013.

- F The following is forecasted equity activity from June, 30 2012, through December 31, 2013 included in our internal forecast (dollars in thousands):

Capital Stock Expense	XXX	Confidential
Change in debt outstanding at Ecova	XXX	Confidential
Dividends	XXX	Confidential
Net Income	XXX	Confidential
Net Common Stock Issuance	XXX	Confidential
Adjustment to retained earnings due to forecasted subsidiary activity	XXX	Confidential
	<u>\$ -</u>	

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Capital Structure Reconciliation

Pages 1 of 1