

DAVID J. MEYER
VICE PRESIDENT, CHIEF COUNSEL REGULATORY & GOVERNMENTAL
AFFAIRS
AVISTA CORPORATION
P.O. BOX 3727
1411 EAST MISSION AVENUE
SPOKANE, WASHINGTON 99220-3727
TELEPHONE: (509) 495-4316
FACSIMILE: (509) 495-4361

RECEIVED
2008 APR -3 PM 12:40
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. AVU-E-08-01
OF AVISTA CORPORATION FOR THE)	CASE NO. AVU-G-08-01
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)	MALYN K. MALQUIST
)	

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 Malyn K. Malquist. My business
5 address is 1411 East Mission Avenue, Spokane, Washington.
6 I am employed by Avista Corporation as Executive Vice
7 President and Chief Financial Officer.

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

10 A. I received a Bachelors degree and a Master of
11 Business Administration degree from Brigham Young
12 University. I have also attended a variety of utility
13 finance courses and leadership programs during my 25+ year
14 utility career.

15 I joined Avista in September of 2002 as Senior Vice
16 President. In November 2002 I was named to the additional
17 position of Chief Financial Officer. I was named Executive
18 Vice President in May 2006. Prior to joining Avista, I
19 was General Manager of Truckee Meadows Water Authority in
20 Reno, Nevada, which was separated out from Sierra Pacific
21 Power Company in 2001. I was Chief Executive Officer of
22 Data Engines, Inc., a high tech company located in Reno
23 from June to October of 2000. From April 1994 to April
24 2000, I was employed by Sierra Pacific Resources, first as
25 the company's Chief Financial Officer and later as its

1 Chairman of the Board and Chief Executive Officer.
2 Following the merger of Sierra Pacific Resources with
3 Nevada Power Company in 1999, I became the President of
4 both Sierra Pacific Power Company and Nevada Power Company.
5 For the sixteen-year period prior to 1994, I was employed
6 by San Diego Gas & Electric Company in various positions,
7 including Treasurer and Vice President - Finance.

8 **Q. What is the scope of your testimony in this**
9 **proceeding?**

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

17 I will address the proposed capital structure and debt
18 cost components. Company witness Dr. Avera will testify to
19 the appropriate return on equity for the Company.

20 In brief, I will provide information that shows:

- 21 • Avista's plans call for significant capital
22 expenditure requirements for the utility over the
23 next three to five years to assure reliability in
24 our energy systems, and to keep pace with
25 regional growth and customer demand. Capital
26 expenditures are planned for 2008-2009 of
27 approximately \$390 million for customer growth,
28 investment in generation, transmission and
29 distribution facilities for the electric utility
30 business as well as necessary maintenance and

1 replacements of our natural gas utility systems.
2 Avista needs adequate cash flow from operations
3 to fund these requirements.
4

5 • Avista's corporate rating from Standard & Poor's
6 is currently BBB-. Avista Utilities should
7 operate at a level that will support a strong
8 investment grade credit rating, meaning "BBB+" or
9 "A-". The Company's financial performance has
10 improved; however, we have not improved financial
11 ratios to a level that would result in a strong
12 investment grade credit rating.
13

14 • The Company has proposed an overall rate of
15 return of 8.74%, including a 47.94% equity ratio
16 and a 10.8% return on equity. We believe the
17 10.8% provides a reasonable balance of the
18 competing objectives of continuing to improve our
19 financial health, and the impacts that increased
20 rates have on our customers.
21

22 The Company's initiatives to carefully manage its
23 operating costs and capital expenditures are an important
24 part of improving performance, but are not sufficient
25 without revenues from the general rate request for our
26 electric and natural gas businesses in these cases.
27 Certainty of cash flows from operations can only be
28 achieved with the continued support of regulators in
29 allowing the timely recovery of costs and the ability to
30 earn a fair return on investment.

31 **Q. Are you sponsoring any exhibits with your direct**
32 **testimony?**

33 A. Yes. I am sponsoring Exhibit No. 2 pages 1
34 through 4, which were prepared under my direction.
35 Avista's credit ratings by the three principal rating
36 agencies are summarized on page 1, and Avista's actual

Malquist, Di 3
Avista Corporation

1 capital structure at December 31, 2007 and pro forma
2 capital structure at December 31, 2008 are included on page
3 2, with supporting information on pages 3 through 4.

4

5

II. FINANCIAL OVERVIEW

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

8 A. The Company has made solid progress in improving
9 its financial health in recent years. The Company has been
10 able to reduce outstanding debt, refinance debt at lower
11 rates and improve cash flows from operations, resulting in
12 improved financial ratios. Additionally, Avista has
13 reduced investments in unregulated subsidiaries and
14 redeployed the majority of the proceeds from the sales of
15 the unregulated subsidiaries to the Utility. The Company
16 has been able to improve its debt ratio and balance the
17 overall debt / equity ratio by paying down debt and issuing
18 additional common stock.

19 Although we have made progress in improving the
20 Company's financial condition, we are still not as strong
21 as we need to be. Avista's goal is to operate at a level
22 that will support a strong credit rating of BBB+ / A-.
23 Operating at this level will help reduce long-term costs to
24 customers. We expect that a continued focus on the
25 regulated utility, conservative financing strategies

1 (including the issuance of common equity) and a continued
2 supportive regulatory environment will contribute to an
3 overall improved financial situation.

4 **Q. What additional steps is the Company taking to**
5 **improve its financial health in the future?**

6 A. We are working to assure we have adequate funds
7 for operations, capital expenditures and debt maturities,
8 through lines of credit with our banks and maintaining
9 adequate access to the capital markets. We have worked
10 with our banks to insure that we have adequate liquidity
11 through the availability of our credit facility on the most
12 economic basis possible. Additionally, the Company plans
13 to obtain a portion of our capital requirements through
14 equity issuance. We also maintain an ongoing dialogue with
15 the rating agencies regarding the measures being taken by
16 the Company to improve our credit rating.

17 Additionally, the Company is working through
18 regulatory processes to recover our costs in a timely
19 manner so that earned returns are closer to those allowed
20 by regulators in each of the states we serve. This is one
21 of the key determinants from the rating agencies'
22 standpoint when they are reviewing our overall credit
23 rating.

24

25

1 **III. CREDIT RATINGS**

2 **Q. Please explain the credit ratings for Avista's**
3 **debt and other securities.**

4 A. Rating agencies are independent agencies that
5 assess risks for investors. The three most widely
6 recognized rating agencies are Standard & Poor's (S&P),
7 Moody's Investors Service (Moody's) and FitchRatings
8 (Fitch). These rating agencies assign a credit rating to
9 companies and their securities so investors can more easily
10 understand the risks associated with investing in their
11 debt and preferred stock.

12 Avista's credit ratings by the three principal rating
13 agencies are summarized on page 1 of Exhibit No. 2.
14 Additionally, the following rating actions occurred during
15 2007 and 2008:

- 16 a. S&P upgraded Avista's corporate credit rating to
17 BBB- from BB+ (February 2008) and Avista's secured
18 debt rating to BBB+ from BBB- (September 2007).
19
20 b. Moody's upgraded Avista's corporate credit rating
21 to Baa3 from Ba1 and Avista's secured rating to
22 Baa2 from Baa3 (December 2007).
23
24 c. Fitch upgraded Avista's long-term issuer default
25 rating to BB+ from BB and its secured debt rating
26 to BBB from BBB- (August 2007 and affirmed in
27 February 2008).
28

29 **Q. Please explain the implications of these ratings**
30 **(in terms of the Company's ability to access financial**
31 **markets).**

1 A. For each type of investment a potential investor
2 could make, the investor looks at the quality of that
3 investment in terms of the risk they are taking and the
4 priority they would have in the event that the organization
5 experiences severe financial stress. Investment risks
6 include the likelihood that a company will not meet all of
7 its debt obligations in terms of timeliness and amounts
8 owed for principal and interest. Secured debt receives the
9 highest ratings and priority for repayment and, hence, has
10 the lowest relative risk. Thus, lower credit ratings may
11 result in a company having more difficulty accessing
12 financial markets and/or increased financing costs.

13 **Q. What risks are facing Avista and the utility**
14 **sector that may have an impact on companies' credit**
15 **ratings?**

16 A. Among the risk factors are the level and
17 volatility of wholesale electric market prices and natural
18 gas prices for fuel costs, liquidity in the wholesale
19 market (fewer counterparties and tighter credit
20 restrictions), recoverability of natural gas and power
21 costs, streamflow and weather conditions, changes in
22 legislative and governmental regulations, relicensing hydro
23 projects, rising construction and raw material costs and
24 access to capital markets at a reasonable cost.

1 Higher capital expenditures for environmental
2 compliance, new generation and transmission and
3 distribution facilities are also impacting the utility
4 sector. The significant need for capital expenditures
5 causes increased competition for financial capital.
6 Regulation supporting the full and timely recovery of
7 prudently incurred costs is critical to the utility sector,
8 including Avista.

9 **Q. What credit rating does Avista Utilities believe**
10 **is appropriate?**

11 A. Avista Utilities should operate at a level that
12 will support a strong investment grade credit rating,
13 meaning a "BBB+" or an "A-," using S&P's rating scale. In
14 fact, S&P stated in its November 2007 U.S. Utilities and
15 Power Commentary that "About 68% of the companies in the
16 industry carry a 'BBB' category rating (BBB+, BBB, and BBB-)
17 and 24% are rated 'A-' and above."¹ Ratios required to
18 support this level of credit rating are included in Table 1
19 below.

20 Financially healthy utilities have lower financing
21 costs which, in turn, benefits customers. In addition,
22 financially healthy utilities are better able to invest in
23 the needed infrastructure over time to serve their

¹ Standard and Poor's, *U.S. Utilities And Power Commentary*, November 2007

1 customers, and to withstand the challenges and risks facing
2 the industry.

3 **Q. Why is it important to have a strong investment**
4 **grade credit rating?**

5 A. A utility is a capital-intensive business and, as
6 such, needs to have ready access to capital markets under
7 reasonable terms. Access is more difficult and more
8 expensive for lower rated companies. As new financing is
9 required in the future to finance utility plant additions,
10 new customer additions, and debt maturities, the cost of
11 new and replacement debt will be higher for lower rated
12 issuers.

13 The lower credit rating also requires the Company to
14 post more collateral with counterparties than would
15 otherwise be required with a higher credit rating. This
16 results in increased costs. It also reduces financial
17 flexibility since we must always maintain a certain amount
18 of capacity under our credit line for letters of credit.

19 **Q. What credit rating ratios are used by the rating**
20 **agencies?**

21 A. S&P modified its electric and gas utility
22 rankings in November 2007 to conform to the "business
23 risk/financial risk" matrix used by their corporate ratings
24 group. The change by S&P was designed to present their

1 rating conclusions in a clear and standardized manner
 2 across all corporate sectors.

3 S&P's financial ratio benchmarks used to rate
 4 companies such as Avista are set forth below:

5

Table 1

Standard & Poor's Financial Risk Indicative Ratios - US Utilities			
	FFO/Debt (%)	FFO/Interest (x)	Debt Ratio (%)
Modest	40 - 60	4.0 - 6.0	25 - 40
Intermediate	25 - 45	3.0 - 4.5	35 - 50
Aggressive	10 - 30	2.0 - 3.5	45 - 60
Highly leveraged	Below 15	2.5 or less	Over 50
December 31, 2007 Ratios:			
Avista Unadjusted	14.0	2.9	53.8
Avista Adjusted	13.3	2.8	58.7

6

7 The ratios above are utilized to determine the
 8 financial risk profile. Currently, Avista is in the
 9 "Aggressive" category. The financial risk category along
 10 with the business risk profile (Avista is in the Strong
 11 category) is then utilized in the matrix below to determine
 12 a company's rating. S&P currently has Avista's corporate
 13 credit rating as a BBB-, as indicated in the table below.

14

Table 2

Business Risk Profile	Financial Risk Profile				
	Minimal	Modest	Intermediate	Aggressive	Highly leveraged
Excellent	AAA	AA	A	BBB	BB
Strong	AA	A	A-	BBB-	BB-
Satisfactory	A	BBB+	BBB	BB+	B+
Weak	BBB	BBB-	BB+	BB-	B
Vulnerable	BB	B+	B+	B	B-

15

1 The other rating agencies (Moody's and Fitch) use a
2 similar methodology to analyze and determine utility credit
3 ratings.

4 **Q. Please describe how these ratios are calculated**
5 **and what they mean?**

6 A. The first ratio, "Funds from operations/total
7 debt (%)", calculates the amount of cash from operations as
8 a percent of total debt. The ratio indicates the company's
9 ability to fund debt obligations. The second ratio, "Funds
10 from operations/interest coverage (x)", calculates the
11 amount of cash from operations that is available to cover
12 interest requirements. This ratio indicates how well a
13 company's earnings can cover interest payments on its debt.
14 The third ratio, "Total debt/total capital (%)", is the
15 amount of debt in our total capital structure. The ratio
16 is an indication of the extent to which the company is
17 using debt to finance its operations. S&P looks at many
18 other financial ratios; however, these are the three most
19 important ratios they use when analyzing our financial
20 profile.

21 **Q. Do rating agencies make adjustments to the**
22 **financial ratios that are calculated directly from the**
23 **financial statements of the Company?**

24 A. Yes. Rating agencies make adjustments to debt to
25 factor in off-balance sheet commitments (for example, the

1 accounts receivable program, purchased power agreements and
2 the unfunded status of pension and other post-retirement
3 benefits) that negatively impact the ratios. S&P has
4 historically made adjustments to Avista's debt totaling
5 approximately \$226 million related to the accounts
6 receivable program, purchased power and post-retirement
7 benefits. The adjusted financial ratios for Avista are
8 included in Table 1 above.

9 **Q. Where does Avista fall within those coverage**
10 **ratios?**

11 A. Avista's cash flow ratios lag primarily because
12 of high cost debt that is outstanding. The cash flow
13 ratios should improve as the 2008 debt maturities are
14 refinanced. S&P and Moody's took this into account when
15 they upgraded Avista in December 2007 and February 2008.
16 Progress in increasing the cash flow ratios has been slower
17 than anticipated due to below normal stream flows affecting
18 hydro generation, higher thermal fuel costs than the amount
19 included in rates and resulting inability to eliminate
20 electric deferral balances, and higher capital expenditures
21 that require cash up front before we can recover the costs
22 from customers. Each has an impact on the Company by
23 reducing the amount of available cash flow from operations,
24 requiring external financing and ultimately resulting in
25 higher debt and lower cash flow ratios. In fact, S&P

1 stated the following in a January 2008 research report on
2 Pacific Northwest Hydrology:

3 We find that Avista and Idaho Power, which are
4 comparably sized companies, face the most
5 substantial risk (related to hydro power) despite
6 their PCAs and cost update mechanisms.²
7

8 Additionally, S&P stated the following in its February 2008
9 research update of Avista Corporation:

10 The Company's financial performance will continue
11 to be significantly affected by hydro conditions
12 and gas prices. And the Company's key utility
13 risk going forward is its exposure to high-cost
14 replacement power, particularly in low water
15 years.³
16

17 In order to improve the cash flow ratios, Avista must
18 reduce its total debt balances and increase its available
19 funds from operations. Although the Company has continued
20 to work towards paying down its total debt, the negative
21 impacts to cash flow caused by below-normal hydroelectric
22 generation and volatility of wholesale electric market
23 prices and natural gas prices in recent years, has
24 adversely affected Avista's progress in improving the cash
25 flow ratios.

26 **Q. Do the rating agencies look at any other factors**
27 **when evaluating a company's credit quality?**

28 A. Yes, they also look at a number of qualitative
29 factors. The rating agencies evaluate the company's

² Standard and Poor's, *Pacific Northwest Hydrology and Its Impact on Investor-Owned Utilities' Credit Quality*, January 2008

1 resource picture, the competitive environment in which we
2 operate, the regulatory environment including the timely
3 recovery and certainty of recovery of costs, quality of
4 management and financial policy. Therefore, while the
5 ratios are utilized in their quantitative evaluation of a
6 company, they are not the only factors that are taken into
7 account.

8 **Q. How important is the regulatory environment in**
9 **which a Company operates?**

10 A. The regulatory environment in which a company
11 operates is a major qualitative factor in determining a
12 company's creditworthiness. Moody's stated the following
13 regarding Avista's regulatory environment in a December
14 2007 credit ratings report:

15 Moody's is assuming that the company's regulators
16 in its Washington, Idaho, and Oregon
17 jurisdictions will continue to support timely and
18 adequate recovery of, and return on, the capital
19 investments through decisions in future general
20 rate cases that we expect will be filed on a
21 regular basis.⁴

22
23 Additionally, in a January 2008 article published by
24 S&P entitled "Top Ten US Electric Utility Credit Issues for
25 2008 and Beyond", S&P stated that "Recovering in a timely
26 manner federally and/or state mandated compliance costs is

³ Standard and Poor's, *Avista Corp's Corporate Credit Rating Raised One Notch to BBB-*, February 2008

⁴ Moody's Investor Service, *Moody's Upgrades Avista Corp* (December 20, 2007)

1 paramount to preserving credit quality for regulated
2 electric utilities.”⁵

3 Due to the major capital expenditures planned by
4 Avista, the continued supportive regulatory environment
5 will be important to Avista’s financial health.
6 Additionally, although Avista has electric and natural gas
7 tracking mechanisms (PCA and PGA) to provide recovery of
8 the majority of the variability in commodity costs, these
9 changes in costs must be financed until the costs are
10 recovered from customers. Investors and rating agencies
11 are concerned about regulatory lag and cost-recovery
12 related to these items.

13

14

IV. CASH FLOW

15 **Q. What are the Company’s sources of funding capital**
16 **requirements?**

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

22 **Q. What are the Company’s near-term capital**
23 **requirements?**

⁵ Standard and Poor’s, *Top Ten US Electric Utility Credit Issues for 2008 and Beyond*, January 2008

1 A. As a combination electric and natural gas
2 utility, over the next few years, capital will be required
3 for customer growth, investment in generation, transmission
4 and distribution facilities for the electric utility
5 business, as well as necessary maintenance and replacements
6 of our natural gas systems.

7 The amount of capital expenditures planned for 2008-
8 2009 is approximately \$390 million. For 2008 alone, these
9 costs equate to a total of \$190 million. Total net rate
10 base at December 31, 2007 was \$1.7 billion for the total
11 Company; therefore, these planned capital additions
12 represent substantial new investments. A few of the major
13 capital expenditure items on a system basis for 2008
14 include \$46 million for electric transmission and
15 distribution upgrades, \$43 million for electric and natural
16 gas customer growth, \$21 million for natural gas system
17 upgrades, \$9 million for environmental (associated with the
18 Spokane River relicensing and the 2001 Clark Fork River
19 license implementation issues), \$26 million for generation
20 upgrades, and \$15 million for Jackson Prairie capacity and
21 deliverability expansions.

22 **Q. What are the Company's long-term capital**
23 **requirements?**

24 A. Avista's Integrated Resource Plan has identified
25 the potential need for the Company to finance significant

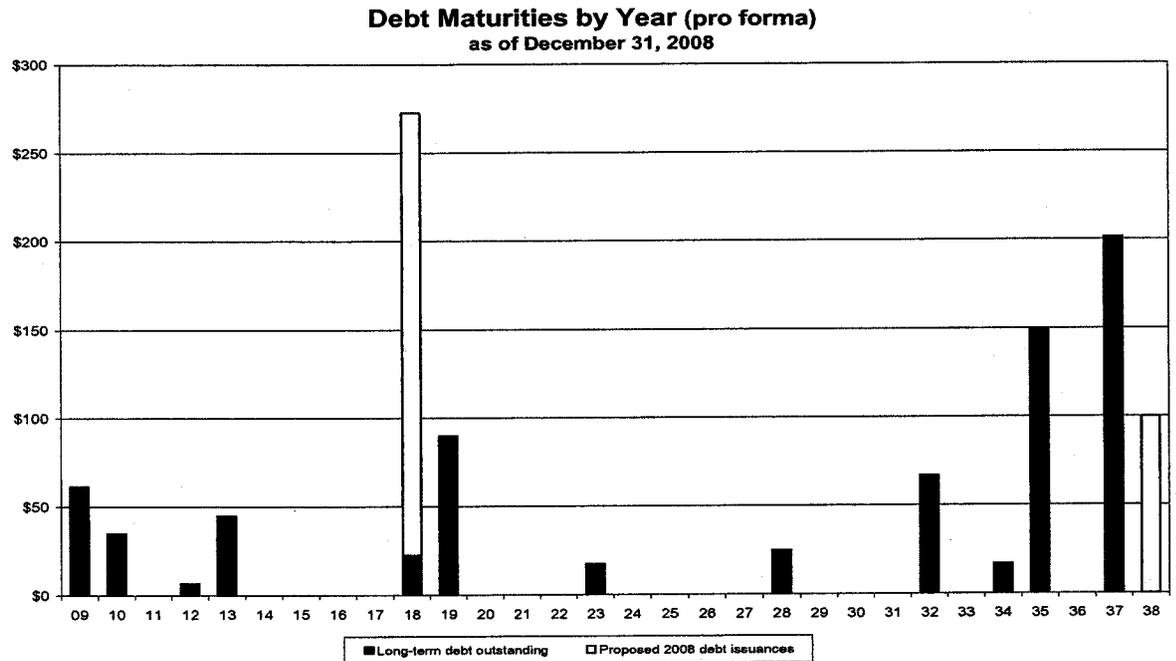
1 expenditures for electric facilities. The preferred
2 strategy outlined in our 2007 Integrated Resource Plan
3 included total expenditures of \$1.25 billion by 2018,
4 including investment in wind resources and upgrades at
5 hydroelectric stations.

6 Major capital expenditures are a normal part of
7 utility operations. Customers are added to the service
8 area, roads are relocated and require existing facilities
9 to be moved, and facilities continue to wear out and need
10 replacement. These and other requirements create the need
11 for significant capital expenditures each year. We are
12 seeing significant increases in the costs of materials,
13 including the cost of steel, cement, asphalt, and
14 transformers. Access to capital at reasonable rates is
15 dependent upon the Company maintaining a strong capital
16 structure, sufficient interest coverage, and investment
17 grade credit ratings.

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

20 A. The Company plans to issue up to \$350 million of
21 secured, fixed rate bonds during 2008. The proceeds from
22 the issuance of the securities will be utilized to fund
23 debt maturities and repay funds borrowed under our credit
24 facility. The Company has \$318 million of debt maturing in
25 2008 and capital expenditures of approximately \$190 million

1 during 2008. The proposed 2008 issuance of debt securities
2 has been reflected in the chart below.



3
4 In addition to the \$318 million of debt maturities in
5 2008, we have \$83.7 million of Pollution Control Bonds
6 (\$66.7 million with a maturity date of October 2032 and
7 \$17.0 million with a maturity date of March 2034) that are
8 subject to remarketing on December 30, 2008. These bonds
9 are puttable at the option of the security holders on
10 December 30, 2008. If the bonds cannot be remarketed on
11 that date, we will be required to purchase the outstanding
12 bonds. In addition, we have \$25 million of Medium-Term
13 Notes with a maturity date of June 2028 that are puttable
14 at the option of the security holders in June 2008.

1 Q. The debt maturities graph above reflects a
2 proposed 2008 debt issuance of \$250 million maturing in
3 2018. Why is the Company proposing such a large maturity
4 in one year?

5 A. Avista has had discussions with various
6 investment bankers regarding our proposed 2008 debt
7 issuances. The investment bankers have indicated that
8 investors are charging a premium for debt issuance
9 transactions that are not "index eligible", due to
10 volatilities that have occurred in the market over the past
11 year. A debt issuance must be at least \$250 million in
12 order to be index eligible. The investment bankers have
13 indicated that the premium could range from 10 - 15 bps,
14 which is \$250,000 to \$375,000 annually. Due to the
15 significance of the premium, Avista believes it would be
16 beneficial to customers to issue debt that is index
17 eligible. Additionally, based upon the projected growth of
18 Avista, the maturity will be much smaller by the time the
19 debt issuance is required to be refinanced, on a relative
20 basis. Avista will continue to monitor the capital markets
21 and balance the impact of debt issuances on the maturity
22 graph and the cost of debt as well as the impact to
23 customers and rates.

1 Q. Has the Company taken any steps to address the
2 uncertainty related to interest rate exposure for the
3 significant debt maturities it faces in 2008?

4 A. Yes, it has. As a result of the historically low
5 interest rate environment that existed in 2004, the Company
6 entered into two forward-starting interest rate swaps
7 totaling \$125 million or almost 46% of the June 1, 2008
8 debt maturity. The swaps have contract terms of ten years
9 beginning in 2008. These agreements secured a fixed rate
10 for a significant portion of the total future interest
11 rate. These agreements only lock in a portion of Avista's
12 credit spread. The swaps will be cash settled on the same
13 day we issue new debt securities to fund the June 1, 2008
14 maturity.

15 Q. What other financing activities did the Company
16 complete in 2004 through 2007 that will lower its interest
17 costs?

18 A. The Company completed the following financing
19 activities from 2004 through 2007 that lowered interest
20 costs:

21 **Table 3**

Description of Securities Issued	Amount (in millions)	Rate	Life
Trust Preferred Stock:			
April 2004	\$60	6.50%	5
First Mortgage Bonds:			
November 2004	\$90	5.45%	15
November 2005	\$150	6.25%	30
December 2006	\$150	5.70%	30.5

1 The financing activity described in Table 3 above has
2 had a direct impact on the Company's debt costs. Cost of
3 total debt has decreased from 8.68% at December 31, 2003 to
4 7.91% at December 31, 2007. The cost of debt should
5 decrease significantly once the 2008 debt maturities are
6 refinanced, as evidenced by the pro forma cost of debt of
7 6.84% as of December 31, 2008 reflected in this filing.

8 **Q. What is the status of the Company's line of**
9 **credit secured by first mortgage bonds and its accounts**
10 **receivable program?**

11 A. The Company has a \$320 million line of credit
12 that expires in April 2011. The Company has the option of
13 increasing the line by \$100 million (up to \$420 million) at
14 any time during the term of the agreement, subject to
15 additional fees and obtaining bank commitments. The
16 agreement includes the option to release the first mortgage
17 bond security when the Company has an investment grade
18 credit rating. Additionally, the Company has an \$85
19 million accounts receivable funding program that expires in
20 March 2009. This demonstrates increased confidence by our
21 banks in Avista's financial condition.

22 The facilities have been sized to allow the Company to
23 fund at least one year of capital expenditures, plus
24 required working capital and counterparty collateral

1 requirements to assure flexibility given both the volatile
2 financial markets and volatile energy commodity prices.

3 Many purchases of natural gas, or contracts for
4 pipeline capacity to provide natural gas transportation,
5 require collateral, and/or prepayments, based upon the
6 Company's credit rating. Upgrades to Avista's credit
7 ratings during 2007 and 2008 have reduced the amount of
8 collateral required to be posted with counterparties. If
9 Avista is upgraded above its current credit ratings, the
10 collateral requirements are expected to decrease, resulting
11 in reduced borrowing costs. The line of credit and
12 accounts receivable program are our primary sources of
13 immediate cash for borrowing to meet these needs and for
14 supporting the use of letters of credit. A line of credit
15 is required to manage daily cash flow since the timing of
16 cash receipts versus cash disbursements is never totally
17 balanced.

18 **Q. What are Avista's plans regarding common equity**
19 **and why is this important?**

20 A. Avista will continue to monitor the common equity
21 ratio of its capital structure. We will continuously
22 assess the need to issue additional common equity based
23 upon our overall capital structure. Avista entered into a
24 sales agency agreement in December 2006 to issue up to two
25 million shares of our common stock from time to time.

1 During the second half of 2008, we are planning to issue
2 common stock under this sales agency agreement in order to
3 maintain our equity ratio at an appropriate level. It is
4 important to the rating agencies who rate the Company's
5 securities, and hence an important component of the
6 Company's cost of doing business, for Avista to maintain a
7 balanced debt/equity ratio in order to minimize the risk of
8 default on required debt interest payments. Avista is
9 committed to maintaining an appropriate level of equity to
10 support a strong credit rating.

11 **Q. What are Avista's plans regarding preferred**
12 **equity and other financing structures (for example hybrid**
13 **instruments)?**

14 A. Avista does not have any preferred equity or
15 other financing structures outstanding at December 31,
16 2007. Currently, Avista does not plan to issue preferred
17 equity or other financing structures. Avista will continue
18 to evaluate the appropriateness of preferred equity and
19 other financing structures within its overall capital
20 structure.

21

22 **V. CAPITAL STRUCTURE**

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

1 A. Avista's current capital structure consists of a
2 blend of long-term debt and common equity necessary to
3 support the assets and operating capital of the Company.
4 The proportionate shares of Avista Corp.'s actual capital
5 structure on December 31, 2007, are shown on page 2 of
6 Exhibit No. 2. A pro forma capital structure is also shown
7 on page 2 in the Exhibit, which reflects expected changes
8 for the period ending December 31, 2008. Supporting
9 workpapers provide additional details related to these
10 adjustments on pages 3 through 4.

11 The rate of return to be applied to rate base in this
12 proceeding is equal to the weighted average cost of
13 capital, taking into account the pro forma adjusting items.
14 As shown on page 2 of Exhibit No. 2, Avista Utilities is
15 proposing an overall rate of return of 8.74%.

16

17

VI. COST OF DEBT

18 **Q. How have you determined the cost of debt?**

19 A. Cost of debt in the Company's proposed capital
20 structure includes long-term debt. As shown on page 2 of
21 Exhibit No. 2, the actual weighted average cost of long-
22 term debt outstanding on December 31, 2007 was 7.91%. The
23 size and mix of debt changes over time based upon the
24 actual financing completed. We have made certain pro forma
25 adjustments to update the debt cost through December 31,

1 2008 to 6.84%. Pro forma adjustments to long-term debt
2 reflect expected maturities of outstanding debt and the
3 issuance of new debt to fund those maturities. The pro
4 forma weighted cost of long-term debt was reduced from
5 4.17% to 3.56%.

6

7

VII. COST OF COMMON EQUITY

8

9

**Q. What rate of return on common equity is the
company proposing in this proceeding?**

10

11

12

13

14

15

A. The company is proposing a 10.8% return on common
equity (ROE), which is within the lower end of Dr. Avera's
recommended range of required return on equity. Dr. Avera
testifies to analyses related to the cost of common equity
with an ROE range of 10.7% to 12.2%. In his testimony Dr.
Avera states that:

16

17

18

19

20

21

22

23

24

Considering investors' expectations for
capital markets and the need to support
financial integrity and fund crucial
capital investment even under adverse
circumstances, I concluded that Avista's
requested ROE of 10.8% percent is
reasonable. (P. 5, L. 19-23)

25

26

**Q. Dr. Avera suggests an ROE range of 10.7% to
12.2%. Why is Avista requesting an ROE on the lower end of
the range?**

27

28

29

A. As I have testified, Avista has made solid
progress towards improving its financial health. If Avista
can earn a 10.8% ROE in 2009, I believe the financial

1 condition would continue to improve and would further
2 strengthen the credit ratings ratios.

3 Furthermore, as the Company has worked toward
4 improving its financial condition over the last several
5 years, it has done so with the customer in mind. Avista is
6 attempting to balance the ability to continue to improve
7 our financial health and access capital markets under
8 reasonable terms with the impacts that increased retail
9 rates have on its customers. In this case, although we
10 believe an ROE greater than 10.8% is supported and is
11 warranted, we also believe the 10.8% provides a reasonable
12 balance of the competing objectives.

13 **Q. Please summarize the proposed capital structure**
14 **and the cost components for debt and common equity.**

15 A. As also shown on page 2 of Exhibit No. 2, the
16 following table shows the capital structure and cost
17 components proposed by the Company.

18

19 **Table 4**

PRO FORMA

Cost of Capital as of December 31, 2008	<u>Amount</u>	<u>Percent of Total Capital</u>	<u>Cost</u>	<u>Component</u>
Long-term Debt	\$1,075,800,000	52.06%	6.84%	3.56%
Common Equity	<u>990,683,000</u>	<u>47.94%</u>	10.80%	<u>5.18%</u>
TOTAL	<u>\$2,066,483,000</u>	<u>100.00%</u>		8.74%

20

21

1 Q. Does that conclude your pre-filed direct
2 testimony?

3 A. Yes.

RECEIVED

2008 APR -3 PM 12:41
IDAHO PUBLIC
UTILITIES COMMISSION

DAVID J. MEYER
VICE PRESIDENT, GENERAL COUNSEL, REGULATORY &
GOVERNMENTAL AFFAIRS
AVISTA CORPORATION
P.O. BOX 3727
1411 EAST MISSION AVENUE
SPOKANE, WASHINGTON 99220-3727
TELEPHONE: (509) 495-4316
FACSIMILE: (509) 495-8851

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. AVU-E-08-01
OF AVISTA CORPORATION FOR THE)	CASE NO. AVU-G-08-01
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)	MALYN K. MALQUIST
)	

FOR AVISTA CORPORATION

(ELECTRIC AND NATURAL GAS)

AVISTA CORPORATION
Long-term Securities Credit Ratings

	Standard & Poor's	Moody's	Fitch
Last Reviewed	February 2008	December 2007	August 2007
Credit Outlook	Stable	Stable	Positive
A+	A1	A+	
A	A2	A	
A-	A3	A-	
BBB+ First Mortgage Bonds Secured Medium-Term Notes	Baa1	BBB+	
BBB	Baa2 First Mortgage Bonds Secured Medium-Term Notes	BBB First Mortgage Bonds Secured Medium-Term Notes	
BBB- Avista Corp./Corporate rating Senior Corporate Notes 9.75%	Baa3 Avista Corp./Issuer rating Senior Corporate Notes 9.75%	BBB- Senior Corporate Notes 9.75%	
INVESTMENT GRADE			
BB+	Ba1 Trust-Originated Preferred Securities	BB+ Avista Corp./Issuer rating Trust-Originated Preferred Securities	
BB Trust-Originated Preferred Securities	Ba2	BB	
BB-	Ba3	BB-	

AVISTA CORPORATION
Capital Structure and Overall Rate of Return

PRO FORMA

Cost of Capital as of December 31, 2008	<u>Amount</u>	<u>Percent of Total Capital</u>	<u>Cost</u>	<u>Component</u>
Long-Term Debt	\$1,075,800,000	52.06%	6.84%	3.56%
Common Equity	<u>990,683,000</u>	<u>47.94%</u>	10.80% (1)	<u>5.18%</u>
TOTAL	<u>\$2,066,483,000</u>	<u>100.00%</u>		<u>8.74%</u>

EMBEDDED

Cost of Capital as of December 31, 2007	<u>Amount</u>	<u>Percent of Total Capital</u>	<u>Cost</u>	<u>Component</u>
Long-term Debt	\$1,043,660,000	52.71%	7.91%	4.17%
Common Equity	<u>936,501,238</u>	<u>47.29%</u>	10.40%	<u>4.92%</u>
TOTAL	<u>\$1,980,161,238</u>	<u>100.00%</u>		<u>9.09%</u>

(1) Proposed Return on Common Equity - See Avera testimony
See supporting documentation
All costs are shown before tax

Assumptions

1. Started with 12-31-2007 actual
2. Proforma through 12-31-2008
3. The forecasted equity and debt numbers come from forecast DEC6 model run
4. Equity is adjusted for Other Comprehensive Income and capital stock expense of \$21,921,000
5. Forecasted issuance of \$12.5 million of additional equity through different company programs

Line No.	Description	Coupon Rate	Maturity Date	Settlement Date	Principal Amount	Issuance Costs	Redemption Costs	Net Proceeds	Yield to Maturity	Principal Outstanding 12-31-2008	Effective Cost	Line No.
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	
1	SMTN Series A	Series Costs A	06-31-2010	05-01-1993	5,000,000	373,693	690,464	4,274,455	8.275%	5,000,000	21,663	1
2	SMTN Series A	6.67%	07-12-2010	07-12-1993	5,000,000	35,081		4,945,636	7.244%	5,000,000	413,765	2
3	SMTN Series A	7.18%	08-11-2023	08-12-1993	7,000,000	54,364		6,945,636	7.244%	7,000,000	507,064	3
4	SMTN Series A	7.37%	05-10-2012	05-10-1993	7,000,000	49,114		5,733,003	9.455%	7,000,000	661,877	4
5	SMTN Series A	7.39%	05-11-2018	05-11-1993	7,000,000	54,364		5,717,793	9.287%	7,000,000	650,114	5
6	SMTN Series A	7.45%	06-11-2018	06-09-1993	15,500,000	170,597		13,188,963	8.953%	15,500,000	1,387,715	6
7	SMTN Series A	7.53%	05-05-2023	05-05-1993	5,500,000	42,712		4,994,277	9.535%	5,500,000	514,744	7
8	SMTN Series A	7.54%	05-05-2023	05-07-1993	1,000,000	7,726		816,862	9.374%	1,000,000	93,742	8
9	SMTN Series B	Series Costs B	05-01-2009	05-01-1994	5,000,000	329,022		4,962,056	6.982%	5,000,000	21,935	9
10	SMTN Series B	6.90%	07-01-2010	06-09-1993	5,000,000	37,944		4,962,056	6.982%	5,000,000	349,077	10
11	5.70% FMB's	5.70%	07-01-2037	12-15-2006	150,000,000	8,646,793		141,333,207	6.119%	150,000,000	9,178,493	11
12	6.125% FMB's	6.125%	09-01-2013	09-08-2003	45,000,000	931,413		43,252,763	6.664%	45,000,000	2,998,615	12
13	5.45% FMB's	5.450%	12-01-2019	11-18-2004	90,000,000	1,435,924		88,564,076	5.608%	90,000,000	5,047,387	13
14	6.25% FMB's	6.250%	12-01-2015	11-17-2005	150,000,000	-2,185,830		150,489,136	6.226%	150,000,000	9,338,427	14
15	PCB's Kettle Falls	6.00%	12-01-2023	07-29-1993	4,100,000	282,248		3,817,732	6.523%	4,100,000	267,441	15
16	1 PCB's Series 1999A	5.00%	10-01-2032	09-01-1999	66,700,000	2,800,631		59,147,385	5.770%	66,700,000	3,848,883	16
17	1 PCB's Series 1999B	5.125%	03-01-2034	09-01-1999	17,000,000	979,886		14,753,949	6.041%	17,000,000	1,026,907	17
18	MIN's Series C	Series Costs C	06-15-2013	06-15-1998	610,794	610,794					40,720	18
19	MIN's Series C	6.37%	06-19-2028	06-19-1998	15,000,000	174,178		14,825,822	6.458%	15,000,000	968,711	19
20	MIN's Series C	6.37%	06-19-2028	06-19-1998	10,000,000	172,775		9,827,225	6.502%	10,000,000	650,164	20
21	MIN's Series C	8.02%	10-26-2010	10-26-1999	25,000,000	161,287		24,131,186	8.513%	25,000,000	2,128,207	21
22	Trust Preferred Securities	6.500%	04-01-2034	04-05-2004	60,000,000	3,389,726		53,102,004	7.464%	60,000,000	4,478,539	22
23	2 Preferred Debt	8.25%	05-31-2008	05-31-2008	3,300,000	4,000,000		3,300,000	8.317%	3,300,000	16,622,378	23
24	1 Preferred Debt	6.75%	06-01-2008	06-01-2008	100,000,000	1,000,000		99,000,000	6.818%	100,000,000	6,533,788	24
25												25
26												26
27								995,894,410	6.513%	1,033,800,000	67,465,601	27
28	Repurchase	4	12-31-2017	06-30-2006	6,875,000		483,582	6,391,418	8.721%	5	66,586	28
29	Repurchase	4	06-30-2015	06-30-2005	26,000,000		1,696,694	24,303,306	9.181%	5	266,489	29
30	Repurchase	4	06-30-2014	06-30-2004	36,590,000		7,244,895	29,345,105	11.840%	5	1,273,845	30
31	Repurchase	4	09-30-2012	06-30-2003	52,485,000		2,735,044	49,749,956	9.536%	5	466,190	31
32	Repurchase	4	09-30-2010	06-30-2002	203,590,000		11,549,094	192,040,906	9.773%	5	2,146,530	32
33											4,220,080	33
34												34
35	Trust Preferred Securities	4.514%	06-01-2037	06-03-1997	40,000,000	1,362,388	36,146	36,601,466	4.709%	40,000,000	1,883,616	35
36												36
37								1,034,495,876	6.839%	1,073,800,000	73,569,277	37

TOTAL DEBT OUTSTANDING AND COST OF DEBT AT December 31, 2008

- 1 Includes the annual insurance premium
- 2 Forecasted issuance of \$250 million of FMB's with a 10-year life and a weighted average coupon rate of 6.28%
 The weighted average rate is a combination of a \$75 million swap at 7.0%, \$50 million swap at 6.44% and \$125 million of a forecasted rate at 5.78%
- 3 Forecasted average rate is a combination of a \$75 million swap at 7.0%, \$50 million swap at 6.44% and \$125 million of a forecasted rate of 6.75%
- 4 The coupon rate used in the cost of debt at the time of the repurchases
- 5 The amounts are calculated using the IRR function
- 6 Information pulled from the - Var. Rate Long-Term tab

AVISTA CORPORATION
 Probable Cost of Long-Term Variable Rate
 December 31, 2008

	Dec-07	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Avg of (g)
1														
2	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)
3	\$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
4	\$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
5														
6	Number of Days in Month	31	29	31	30	31	30	31	31	30	31	30	31	366
7	Forecasted Trust Preferred Borrowing Rate	5.13%	5.13%	5.13%	4.63%	4.63%	4.63%	4.13%	4.13%	4.13%	3.88%	3.88%	3.88%	3.88%
8	Trust Preferred Interest Expense	176,700	165,300	176,700	154,333	159,478	154,333	142,256	142,256	137,667	133,644	129,333	133,644	1,805,644
9	Total Interest Expense	176,700	165,300	176,700	154,333	159,478	154,333	142,256	142,256	137,667	133,644	129,333	133,644	\$1,805,644
10	Forecasted Monthly Borrowing Rate	5.13%	5.13%	5.13%	4.63%	4.63%	4.63%	4.13%	4.13%	4.13%	3.88%	3.88%	3.88%	4.51%

Average borrowing rate used in the calculation of the effective costs below

Description	Coupon Rate	Maturity Date	Settlement Date	Principal Amount	Issuance Costs	Loss/Rateq Expenses	Net Proceeds	Yield to Maturity	Principal Outstanding 12-31-2008	
									Effective Cost	Cost
18	4.51%	06-01-2037	06-03-1997	40,000,000	1,362,388	36,146	38,601,466	4.709%	40,000,000	1,883,616

* \$10 million of the Series was purchased on 12-18-2000 for \$7.5 million