



Avista Corp.

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March 19, 2021

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

RE: Docket No. UE-210114 – Avista Utilities Tariff WN U-28, Schedule 73, Residential Debt Relief Program

Dear Mr. Johnson:

On February 19, 2021, Avista Corporation, dba Avista Utilities (Avista or “the Company”) filed with the Washington Utilities and Transportation Commission (Commission or UTC) proposed revisions to its electric tariff WN U-28, to introduce its new Schedule 73, “Residential Debt Relief Program” (Debt Relief Program), in compliance with Order No. 01 in Docket No. U-200281. After subsequent conversations with Commission Staff, the Company hereby respectfully requests the following two modifications be made to its original filing:

1. Removal of One-Time Provision for Automatic Grant. In its original filing,¹ the Company states both at page 4 of its Cover Letter as well as in its associated tariff Schedule 73, Original Sheet 73, that the Automatic Grant is to be a “one-time grant”. While the Company does not intend to provide the Automatic Grant to any one customer multiple times, Avista requests removal of this prescriptive language to allow for future flexibility of the Debt Relief Program and avoid potentially redundant filings should the need for multiple grants become apparent before the Debt Relief Program’s expiration in 2022. In support of these

¹ See Docket No. UE-210114, updated cover letter, filed on February 19, 2021 as “210114-AVA-CLtr2-02-19-2021”.

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changes, the Company has provided a 1st Substitute Revision to its Original Sheet 73, which incorporates the deletion of the phrase “one-time” under the Automatic Grant’s description as well as the removal of the phrase “a single instance of funding” within the overall Debt Relief Program description, for clarification. Also, the Company has removed reference to a customer being “entitled to a single grant” in Special Condition #4. The one-time provision in place for the Arrearage Forgiveness Grant, and accompanying justification as provide on page 4 of the initial filing, still remains.

2. Removal of Company Administration and Marketing Costs. At page 7 of its original filing, and associated tariff Schedule 73, Original Sheet 73A, the Company proposes that it may utilize up to one percent (1%) of total funding for administration of the program and to promote the availability of financial assistance throughout the Company’s service area. Avista realizes that these administrative costs, while essential to the proper execution of its Debt Relief Program, are better handled in a future rate proceeding pursuant to Docket Nos. UE-200407 and UG-200208. In support of this change, the Company has provided a 1st Substitute Revision to its Original Sheet 73A, in which it removes all mention of Company administration costs.

Avista respectfully requests that the above-requested modifications be incorporated into its proposed tariff Schedule 73, Residential Debt Relief Program, to be made effective for services on April 1, 2021. In support of these proposed changes, the Company has provided substitute tariff sheets for each of the three impacted pages within Schedule 73. If you have any questions regarding this filing, please contact Jaime Majure at (509) 495-7839.

Sincerely,

/s/Shawn Bonfield

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Enclosure