



**Avista Corp.**

1411 East Mission P.O. Box 3727  
Spokane, Washington 99220-0500  
Telephone 509-489-0500  
Toll Free 800-227-9187

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. UG-210115 – Avista Utilities Tariff WN U-29, Schedule 173, 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 natural gas tariff WN U-29, to introduce its new Schedule 173, “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,<sup>1</sup> the Company states both at page 4 of its Cover Letter as well as in its associated tariff Schedule 173, Original Sheet 173, 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

---

<sup>1</sup> See Docket No. UG-210115, updated cover letter, filed on February 19, 2021 as “210115-AVA-CLtr2-02-19-2021”.

Received  
Records Management  
03/19/21 11:25  
State Of WASH.  
UTIL. AND TRANSP.  
COMMISSION

support of these changes, the Company has provided a 1<sup>st</sup> Substitute Revision to its Original Sheet 173, 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 173, Original Sheet 173A, 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 173A, 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 173, 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 173. If you have any questions regarding this filing, please contact Jaime Majure at (509) 495-7839.

Sincerely,

*/s/ Shawn Bonfield*

Shawn Bonfield  
Sr. Manager of Regulatory Policy & Strategy  
Avista Utilities  
509-495-2782  
[shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com)

Enclosure