

**Avista Corporation**

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Amanda Maxwell
Executive Director and Secretary
Washington Utilities & Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

**RE: UG-230540 (Do Not Redocket) – Avista Utilities Tariff WN U-29, Schedule 192,
Low-Income Rate Assistance Program**

Dear Ms. Maxwell:

On June 30, 2023, Avista Corporation, dba Avista Utilities (Avista or the Company) filed with the Washington Utilities and Transportation Commission (Commission) its subsequent filing, pursuant to WAC 480-07-855, as required by Section 24(a) of the Full Multiparty Settlement Stipulation (Settlement) agreed to within the Company's most recent general rate case (GRC), Docket Nos. UE-220053, UG-220054, and UE-210854 (*Consolidated*). This request also contained proposed revisions to Avista's natural gas tariff Schedule 192, "Low-Income Rate Assistance Program" (LIRAP), to incorporate changes to various LIRAP design elements in accordance with approvals in the above-referenced GRC (requested effective October 1, 2023), as well as a requested rate adjustment necessary to support these efforts (proposed effective November 1, 2023).

Through conversations with Commission Staff and other stakeholders (including Avista's Energy Assistance Advisory Group (EAAG or Advisory Group)), the Company hereby requests the following modifications to its original filing:

1. Remove the requested rate adjustment for Schedule 192, and all associated references to this potential rate change. The Company will make a subsequent rate filing no later than September 1, 2023, concurrent with several other annual rate

adjustments (as noted in the original filing),¹ to become effective on November 1, 2023.

2. Remove Special Condition 8 from its originally filed tariff Schedule 192 proposal. In consultation and concurrence with its Advisory Group, this provision was agreed to be more granular than is necessary in tariff, and did not accomplish its intended purpose of describing the designation of administration and program delivery costs (Admin) to Avista's partner Community Action Agencies (CAAs or Agencies), especially in light of this transitional time for LIRAP's Admin structure.²
3. Resolve several additional tariff changes recommended by members of the Advisory Group since the initial June 30th filing. These changes are all grammatical or organizational in nature, such as fixing a typographical error, adding clarifying language or moving sentences to a more appropriate section heading; no material changes to the tariff resulted from these suggestions.
4. Update the original October 1, 2023 requested effective date to August 31, 2023, to allow for administrative efficiency for Commission Staff's review, and the Commission's consideration of, Avista's filing. Requesting an August 31st effective date streamlines the review of the program design and implementation details for LIRAP with that of other electric and natural gas utilities' bill discount proposals that are currently before the Commission. This will also allow the Company to file its associated LIRAP rate adjustment proposal, as noted herein, shortly thereafter.

With the proposed modifications in place, the Company intends simply to bifurcate the LIRAP program modifications requested to become effective October 1, 2023 with the rate adjustment requested to become effective November 1, 2023. In support of these changes, the Company has provided updated revisions to its tariff Schedule 192, requesting the following changes to its natural gas tariff sheets, WN U-29:

¹ These annual rate adjustments include the Company's annual Purchased Gas Cost (PGA) rate adjustment – which includes Schedule 150, "Purchase Gas Cost Adjustment" and Schedule 155, "Gas Rate Adjustment – Washington" – in addition to a new schedule that will be introduced to implement the Company's Insurance Cost tracker.

² As noted on page 22 of its initial June 30, 2023 filing, Avista has provided the Agencies with a 7% annual increase pursuant to the GRC, and "In alignment with Section 24(b) of the Settlement, Avista agreed to "collaborate with its EAAG to determine the appropriate method, amounts, and administrative structure for future program years." For the 2023-2024 program year, the EAAG has yet to make any decisions regarding these discussions, but is committed to collaborating on this issue and will include a proposal for such funding structure changes in its September 2024 rate adjustment filing."

Substitute Fifteenth Revision Sheet 192	<u>Revised</u>	Fourteenth Revision Sheet 192
Substitute Seventh Revision Sheet 192A	Canceling	Sixth Revision Sheet 192A
Substitute Third Revision Sheet 192B	Canceling	Second Revision Sheet 192B

New
Substitute Original Sheet 192C

Canceled
Schedule 102, all tariff sheets
Schedule 173, all tariff sheets
Schedule 189, all tariff sheets

Avista respectfully requests that the Commission approve the modifications proposed herein – including the Company’s revisions to natural gas tariff Schedule 192 as further described in its initial June 30, 2023 filing (which also contains the requested removal of natural gas tariff Schedules 102, 173, and 189 in their entirety), as well as the above-noted changes – effective August 31, 2023. As noted within the proposed Schedule 192 tariff, the programmatic design elements of Avista’s LIRAP will become effective with the new program year on October 1, 2023.

Pursuant to WAC 480-90-194(1), the Company will provide notice to all customers currently on its Schedule 102, “Senior & Disabled Residential Service – Washington”, regarding the discontinuation of this program and their automatic enrollment in the new LIRAP Bill Discount. A draft copy of this notice has been provided as Attachment A to this filing.

If you have any questions regarding this filing, please contact me at (509) 495-7839 or jaime.majure@avistacorp.com.

Sincerely,

/s/ Jaime Majure

Jaime Majure
Regulatory Affairs Manager

Cc: Avista Energy Assistance Advisory Group

Enclosures