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December 21, 2015

Via Electronic Mail

Steven V. King
Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket No. U-144155 - Comments of Avista Utilities

Dear Mr. King,

Avista Corporation, dba Avista Utilities (Avista or Company), submits the following comments in accordance with the Washington Utilities and Transportation Commission's (Commission) Supplemental Notice of Opportunity to File Written Comments (Notice) issued in Docket U-144155 on November 20, 2015.

On February 18, 2015, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider adoption of rules within Washington Administrative Code (WAC) 480-90-178 and WAC 480-100-178, Billing requirements and payment date. This rulemaking considers establishing standards for all regulated energy companies to investigate and issue a retroactive corrective bill for meter errors including, but not limited to, those created by stopped, slowed, erratic or unassigned usage.

The Commission received written comments on the CR-101 on March 23, 2015. In addition, a workshop with interested stakeholders was held on May 20, 2015. Following this workshop the Commission issued a second Notice of Opportunity to Submit Written Comments and revised draft rule with comments due on July 21, 2015. A third Notice of Opportunity to Submit Written Comments and revised draft rule with comments due on October 5, 2015.

As previously stated, Avista appreciates the iterative process taken by the Commission to attempt to reach consensus on the language of the draft rules and believes the language of the current draft rules is a great improvement over the initial draft. Avista continues to support the intent of the draft rules and offers the following comments on the draft rules:

- In Section 5(a), Avista again proposes that the language in the first sentence, “a utility must issue a corrected bill to a customer to recover or refund billed amounts” be modified to read, “a utility **may** issue a corrected bill to a customer to recover billed amounts and must issue a corrected bill to a customer to refund billed amounts.” Avista proposes this modification as it is the same concept used in its Oregon jurisdiction. Essentially, this modification gives the utility flexibility to not back bill a customer who has been under-billed. For example, in a switched meter or mislabeled meter base situation, the customer that was under-billed may no longer be a customer of the utility. Also, there may be times when the under-billing may not be economic or it would actually be more costly to issue the corrected bill. This flexibility would be both a benefit to the customer and the utility. Alternatively, the language would still require the utility to always refund any amount that has been over-billed.
- In Section 6, Avista again proposes that item (e), “The actions taken to eliminate the cause of the bill correction” be removed. The reason for the bill correction is already included in part (a), therefore the Company does not believe this requirement will add additional value. Avista believes that the issuance of a corrected bill identifying an issue, in itself, indicates to the customer that the issue has been corrected or resolved. The additional messaging that the Company replaced the meter offers little additional value to the Customer. Also, messaging is limited on a bill so the Company would

proposes to eliminate any requirements that may not be needed. Issuing a letter will be necessary in some situations, but also comes at an added cost.

Avista appreciates the opportunity to provide these comments. If you have any questions regarding these comments, please contact Shawn Bonfield at 509-495-2785 or shawn.bonfield@avistacorp.com or myself at 509-495-4975 or at linda.gervais@avistacorp.com.

Sincerely,

/s/Linda Gervais/

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