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July 27, 2020

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

Re: Docket No. U-200281 – Extension of Moratorium on Disconnections

Dear Mr. Johnson,

At the Washington Utilities & Transportation Commission's (Commission) COVID-19 Response Workgroup (Workgroup) workshop held on July 22, 2020, utilities vocalized their commitment to extend the moratorium on disconnections for non-payment of energy bills. To further reinforce these assurances, each utility was asked to submit a letter to the Commission by September 30, 2020 stating as such. As such, Avista Corporation, dba Avista Utilities (Avista or Company), commits in writing to not resume disconnections for non-payment of energy bills prior to October 1, 2020. Avista supports the extension of the moratorium to allow time for the Workgroup to discuss and reach agreement on a path forward as it relates to recovery from the COVID-19 pandemic.

At the same time, the Company urges the Commission to act on the COVID-19 deferral applications pending before the Commission. Approval of the Company's deferral application is a critical element in allowing Avista to be even more accommodating to the shared interest of changing business practices to keep customers connected, and it would provide assurance about the potential to recover costs (and provide benefits) associated with recovery from the financial impacts of COVID-19.

At the workshop, the utilities were also asked to comment on their outreach and communication efforts to their customers. Avista is proud to say that it has been proactive in reaching out and communicating with customers in a myriad of ways, with many efforts being utilized for the first time. The following are efforts undertaken by the Company to communicate with its customers:

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Proactive Customer Callouts:

- CARES and Life-Support Customers – Beginning on March 27, 2020, Avista’s Customer Assistance Referral & Evaluation Services (CARES) team began the process of manually calling the Company’s most vulnerable customers, including those with declared medical-related hardships or life support equipment in the home. The objective of this outreach is to provide a personal check-in with these customers, offering energy assistance advice or any additional information that may be available to suit the specific customer’s needs.
- Lobby Payment Customers – For customers that frequently pay in person at the various Avista lobbies, proactive calls were made to inform these customers of lobby closures and to provide them with alternative payment options and relevant pay-station locations.
- Business Customers – Avista recognizes that business customers are facing critical business decisions as the pandemic progresses, most significantly, the determination of how to stay in business in the downturned economy. As such, the Company created a Small Business Concierge program to support business customers as needed through the COVID-19 crisis. A team made up of Avista Customer Service Representatives (CSRs), Account Executives, Energy Efficiency Engineers and Regional Business Managers began making proactive callouts on April 6, 2020. Through these calls, the Company has offered to apply paid deposits back to accounts to decrease the customer’s utility debt, created payment arrangements to help manage balances, provided information on available funding assistance, provided guidance regarding energy efficiency or HVAC needs, and, perhaps most importantly, the team has listened to feedback from these customers in order to gain valuable insight into the struggles being faced during this time. Account Executives have also proactively reached out to large commercial customers to discuss insight into the struggles they are facing and how the Company may be able to assist them.
- Comfort Level Billing Customers – Amid the COVID-19 crisis, customers enrolled in Avista’s Comfort Level Billing (CLB) budget plan are no longer being canceled from the plan due to non-payment. Instead, a team of CSRs has been enlisted to call these customers to discuss energy assistance options and offer adjustments to existing plans. At the time of this effort’s implementation, approximately 4% of CLB customers were struggling to pay their monthly plan amount by its due date; the Company is hopeful that this targeted outreach will provide these customers with the guidance they need to get back on track.
- Additional Customer Callouts – More and more customers that typically pay on time and do not get too far behind on their energy bills are finding themselves in unique situations as we go through this health and financial crisis. These customers usually self-serve and are not used to contacting Avista or agencies for assistance. CSRs have

been calling these customers to remind them that Avista is here to help and provide guidance toward energy assistance or payment arrangement options.

Email Distribution:

- The Company has utilized email blasts and distributions extensively since the beginning of the COVID-19 situation in an effort to let customers know about its response to the pandemic and of assistance and resources available to them. Emails included information related to payment assistance and options, energy assistance information, self-service options, energy savings tips, COVID-19 resources, utility scams, and more. Emails were distributed to all residential customers on March 11th, March 13th, March 19th, and May 6th. Additional emails went out in April to customers who were behind on their bills.

Reminder Letters:

- Beginning on April 29, 2020, reminder letters were sent to residential customers, inclusive of information regarding energy assistance, payment arrangements, and the customer's account balance. This letter, formatted as a friendly update rather than a past-due notice, contains no threat of disconnect or even a balance due date. Recipients of these Reminder Letters were customers that would have been entering the Company's typical collections cycle, utilizing the internal collection parameters that typically trigger the automated notice process.
- On May 12, 2020, a reminder letter similar to that described above for residential customers was initiated for business customers meeting the same collection parameter criteria.

Other Communications:

- Website Updates – the Company created an “Avista’s COVID-19 Response” web page where customers can find information relating to the Governor’s proclamation, how Avista is responding to the COVID-19 situation, and links for payment and energy assistance, and energy efficiency information. The Company has also expanded on the information related to available payment and energy assistance.
- Integrated Voice Response (IVR) system – the Company has updated its IVR system with additional messaging related to payment and energy assistance for when customers call the Company.
- Social Media – the Company has utilized social media platforms to provide information related to energy efficiency, payment, and energy assistance.
- Brochures on energy savings tips and access to energy assistance have been provided to local food banks to share with their customers.

Lastly, the Workgroup members discussed the need for utilities to submit data on the status of customer arrears and other topics. Data discussed to be submitted includes that which was provided in the Governor's Proclamation 20-23.6 or Exhibit 1 of the Illinois settlement. Avista is happy to provide such information and asks that the Commission issue a Notice requesting the specific data desired, and a date by which the utilities should submit that information.

Avista appreciates the opportunity to collaborate with the Commission and interested stakeholders as it relates to the response to COVID-19. Please direct any questions regarding these comments to Shawn Bonfield at 509-495-2782 or shawn.bonfield@avistacorp.com or me at 509-495-8620 or pat.ehrbar@avistacorp.com.

Sincerely,

/s/Patrick Ehrbar

Patrick Ehrbar
Director of Regulatory Affairs