



Avista Corp.

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VIA: UTC Web Portal

December 21, 2018

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

RE: UE-180961 – Revised Schedule 62 “Small Power Production and Cogeneration Schedule”

Dear Mr. Johnson:

Attached for filing with the Commission is an electronic copy of Avista Corporation’s dba Avista Utilities (“Avista” or “the Company”) substitute filing of its proposed revisions to the following tariff sheets, WN U-28.

Substitute Twelfth Revision Sheet 62 Canceling Eleventh Revision Sheet 62
Substitute Original Sheet 62A

The purpose of this filing is to incorporate feedback received from Commission Staff regarding the Company’s proposed revisions to its tariff Schedule 62, in particular the “Standard Power Rates” and “As-Available Power Rate” sections and to provide updated work papers. Below is an outline of the revisions to the tariff:

- 1) Removed, “including those selling less than all output from their facility” from the As-Available Power Rate section;
- 2) Updated the tariff with the 60 day average of forward prices ending December 19, 2018. This methodology is consistent with how Avista obtains forward pricing during the

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Company's general rate case proceedings and comes from the Intercontinental Exchange (ICE);

- 3) Updated the tariff prices to include seasonal adjustments using the 5-year average seasonal shapes from 2013-2017; and
- 4) Removed a reference to Avista's Power Purchase Agreements (PPA) in the As-Available Power Section.

Avista requests the tariff revision to become effective January 1, 2019. A copy of the "Confidential" workpapers per WAC 480-07-160, supporting the Company's request are provided with this filing, these confidential workpapers include proprietary price data. If you have any questions regarding this filing, please contact me.

Sincerely,

/s/Linda Gervais

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