



Avista Corp.

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April 19, 2021

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

Re: Dockets UE-200407 and UG-200408 - Avista COVID-19 Deferred Accounting Quarterly Report

Avista Corporation, dba Avista Utilities (Avista or the Company), hereby submits its second COVID-19 deferred accounting quarterly report. As described in Order 01 of Docket U-200281 (In the Matter of Response to the COVID-19 Pandemic), and detailed in the “UTC Staff Proposed COVID-19 Response Term Sheet,” approved by the Commission, this quarterly report complies with the following condition of the Cost Recovery section:

4. *Future reporting that itemizes the utility costs in any approved COVID-19 petitions for deferred accounting in the docket approving the petition.*
 - a. *The first report should be filed by December 1, 2020, and cover the period between March 1, 2020 and September 30, 2020.*
 - b. *Subsequent reports should be required 30 days after the close of each quarter and shall include information from the previous quarter to continue until the conclusion of the proceeding in which the Utility requests recovery of the deferred expenses, or until such time the Commission determines the reports no longer provide benefit.*

As of March 31, 2021, the Company has identified and/or deferred the following direct costs and benefits associated with the COVID-19 pandemic resulting in a net asset balance of \$3,094,806 for Washington, or a Washington electric net asset of \$3,169,082, and a Washington natural gas net liability of \$74,276.¹

¹ The Commission approved the Company’s Deferred Accounting Petitions for deferred accounting of COVID-19 related net costs/benefits filed in Dockets UE-200407 and UG-200408 on December 10, 2020, per Order 01.

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The following table provides a summary as of March 31, 2021.

Washington COVID Deferral Summary as of 3/31/2021			
Deferral Type	WA E	WA G	Total
Bad Debt Expense	\$ 5,846,435	\$ 697,095	\$ 6,543,530
COVID Assistance Program	1,757,224	1,150,931	2,908,155
Term Loan Interest/Fees	242,929	59,093	302,022
Other Direct COVID Costs	248,433	77,955	326,388
Reconnect Fees	97,401	4,552	101,953
Total 186	8,192,422	1,989,626	10,182,048
Other Direct COVID Benefits	(1,754,327)	(551,134)	(2,305,461)
CARES Act Tax Benefit	(3,269,013)	(1,512,768)	(4,781,781)
Total 253	(5,023,340)	(2,063,902)	(7,087,242)
Total Ending Balance at 3.31.2021	\$ 3,169,082	\$ (74,276)	\$ 3,094,806

The Company will continue to defer the specific COVID-19 deferred costs and benefits as discussed below on a go-forward basis, impacting the net balances shown, and will update these Washington balances in future reports, 30 days after the close of each quarter-end, as required.

Bad Debt Expense

The Company's bad debt expense has significantly increased as a result of the COVID-19 pandemic. In order to determine the incremental impact on bad debt expense, the Company compared the actual bad debt expense incurred to the amounts set in each of its jurisdiction's most recent general rate cases. In all instances, bad debt exceeded the levels built into customers' rates. As of March 31, 2021, actual bad debt expense incurred for Washington has exceeded the amount authorized by \$6,543,530 (or \$5,846,435 for Washington electric and \$697,095 for Washington natural gas). Incremental bad debt expense is being deferred to account 186 Miscellaneous Deferred Debits.

Short-Term Loan Interest/Fees

In April 2020, the Company entered into a short-term credit agreement in the amount of \$100 million to provide additional liquidity to the Company due to the pandemic. The incremental interest expense and loan fees associated with obtaining the term loan were analyzed. For Washington, short-term debt is included in authorized capital structure and debt costs. Therefore, to determine the debt costs that will be deferred for the COVID term loan borrowing, Avista compared actual costs of short-term borrowing, net of interest income, to the authorized cost of short-term borrowing, resulting in \$242,929 for Washington electric and \$59,093 for Washington natural gas as of March 31, 2021. These amounts were deferred to account 186 Miscellaneous Deferred Debits.

Other Direct COVID Costs

Other direct costs identified by the Company as of March 31, 2021 include those charged directly to specific pandemic projects set up to capture costs incurred to protect the health and safety of utility employees, including personal protective equipment, janitorial services, cleaning supplies and additional hardware/software and other equipment not capitalized to allow employees to work from home. Washington's share of these direct costs is \$326,388 (or \$248,433 Washington electric

and \$77,955 Washington natural gas) and was deferred to account 186 Miscellaneous Deferred Debits.

Other Direct COVID Benefits

Other direct benefits (reductions in costs as a result of the pandemic) identified by the Company as of March 31, 2021 were identified as employee expenses related to travel and training due to COVID-19 restrictions, as well as a reduction in fleet fuel consumption at the beginning of the pandemic when crews were at limited capacity. Washington's share of these direct benefits was \$2,305,461 (or \$1,754,327 Washington electric and \$551,134 Washington natural gas) and has been deferred to account 253 Other Deferred Credits, offsetting deferred expenses.

CARES Act Tax Benefit

As described in the Company's original Deferred Accounting Petition filed on April 9, 2020 in Dockets UE-200407 and UG-200408, the Company will receive a benefit from carrying back its 2019 NOL to the five prior tax years. The benefit is approximately \$7.9M on a system basis, or \$3,269,013 for Washington electric and \$1,512,768 for Washington natural gas. The Company filed the carry back form during Q4 2020 and recorded this benefit as an offset to COVID-19 deferral costs. Washington's share of this benefit has been deferred to account 253 Other Deferred Credits.

The Company filed several accounting method changes for tax purposes with its 2019 federal tax return. The IRS Tax Forms 3115, Application for a Change in Accounting Method, were filed with the Commission on October 19, 2020. The method changes provided a significant amount of deductions that resulted in a 2019 net operating loss. Without these method change deductions, the Company would not have recognized a net operating loss and would therefore not have received this benefit. The service allocations from these additional method change deductions are being used to allocate the benefit.

Reconnection Charges

The Company's reconnection charges have decreased approximately \$101,953 (or \$97,401 Washington electric and \$4,552 Washington natural gas) in 2020 compared to the average charges for the last four years (2016-2019). Although the order referenced a five-year average, a billing system conversion in 2015 made the accessibility and accuracy of the data unreliable for comparison. Reconnection charges have been deferred to account 186 Miscellaneous Deferred Debits.

Bill Payment Assistance Program Costs

The Company filed a tariff for its temporary COVID-19 assistance program described in the "UTC Staff Proposed COVID-19 Response Term Sheet" in Docket U-200281 on February 19, 2021, which the Commission approved with an effective date of April 1, 2021. The costs to fund the program, approximately \$6.5 million or one percent of the Company's 2019 electric and natural gas Commission Basis Reports, will be deferred as funds are provided to customers. Although funds were distributed to customers April 1st in the amount of \$2,908,155 (or \$1,757,224 Washington electric and \$1,150,931 Washington natural gas), the amounts were recorded as a deferral as they were known and measurable at March 31, 2021. These bill payment assistance costs have been deferred to account 186 Miscellaneous Deferred Debits.

Please direct any questions regarding this report to me at 509-495-8601 or liz.andrews@avistacorp.com.

Sincerely,

/s/ Elizabeth Andrews

Elizabeth Andrews
Sr. Manager, Revenue Requirements