



**Avista Corp.**

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September 11, 2020

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

Re: Docket No. UE-190837 – Comments of Avista Utilities

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or Company), submits the following comments in accordance with the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to File Written Comments (“Notice”) issued in Docket UE-190837 on August 14, 2020, *In the Matter of Amending, Adopting, and Repealing WAC 480-107, Relating to Purchases of Electricity (PoE)*, Docket UE-190837. Avista provides the following responses to the questions posed in the Notice:

1. Draft rule WAC 480-107-007 defines repowering. Is the definition clear and do the rules succeed in assuring that a utility’s decision to rebuild generation it owns is evaluated on an equal basis with other alternatives available in the market?

**Avista Response:**

The Company appreciates the discussion regarding repowering and Staff’s recognition of the prior concerns it raised. The Company does not have any suggested revisions to the definition of repowering at this time.

2. Draft rule WAC 480-107-010(1)(b) requires a utility to issue an RFP if “the utility’s two-year IRP update demonstrates a new or unfilled resource need of 80 MW compared to the utility’s most recently filed IRP.” Please provide comments on whether you support or oppose this provision and why?

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**Avista Response:**

As discussed in Avista’s comments filed on June 29<sup>th</sup>, it would be helpful to include both an energy and a capacity threshold for when an RFP is needed based on the utility’s need. A megawatt-hour threshold would be better suited for primarily energy resources compared to capacity resources.

In addition to the responses above, Avista offers the following general comments regarding the draft rules.

**Additional Comments**

WAC 480-107-023(2) – The draft rule as written still requires approval of an independent evaluator (IE) by the Commission. If approval of an IE by the Commission is required, it is not clear as to what the process will look like to acquire approval and what happens if a party opposes the Company’s selection for an IE. For these reasons the Company suggests striking the requirement for Commission approval of an IE as such requirement is inefficient and adds unnecessary process and time to a decision the utility is ultimately responsible for.

WAC 480-107-023(3) – The requirement states “The Independent Evaluator will contract with and be paid by the Utility. The Company suggests striking “and be paid by” from the rule as it may lead to confusion or disagreement when a utility seeks cost recovery for the cost of an IE. Ultimately such costs, once deemed prudent, should be recoverable from customers.

WAC 480-107-025(4) – Avista supports providing a detailed explanation of each criterion and suggests providing category summaries and ranges of weightings for each category instead of the specific weight for each criterion. As mentioned in its comments provided June 29, 2020, the Company prefers this approach to ensure the most competitive bids are received and to maintain confidentiality of bid evaluations.

Please direct any questions regarding these comments to me at 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

/s/ *Shawn Bonfield*

Sr. Manager Regulatory Policy and Strategy  
Avista Utilities