



ATTORNEY GENERAL OF WASHINGTON

Public Counsel

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December 7, 2018

SENT VIA WUTC WEB PORTAL

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

Re: *In the Matter of the Petition of Avista Corporation for an Order Authorizing Approval of Changes to the Company's Natural Gas Line Extension Tariff and Associated Accounting and Ratemaking Treatment,*
Docket UG-180920

Dear Mr. Johnson:

The Public Counsel Unit of the Washington State Attorney General's Office (Public Counsel) respectfully submits these comments in advance of the December 13, 2018, Open Meeting. These comments are in response to Avista Corporation's (Avista) filing of proposed changes to the Company's natural gas line extension tariff. The changes requested would make the Perpetual Net Present Value (PNPV) calculation methodology permanent, and extend the Line Extension Allowance Program (LEAP) for another three years. We appreciate the opportunity to comment on this filing.

Public Counsel's Recommendation

Public Counsel recommends the Commission (1) extend the existing LEAP program for three years, and (2) approve the PNPV calculation methodology used to determine the amount of line extension allowance.

Public Counsel supports the continuation of the LEAP program, as it promotes the efficient end-use of natural gas, expands the natural gas distribution infrastructure, addresses environmental concerns associated with emissions, and provides options to lower the energy burden and increase efficiency to Avista's low-income customers. We believe the goals of this program are being met through the tariff. Public Counsel believes that the program should be approved based on the benefits that are being created.

Public Counsel also supports the continued use of the PNPV methodology to calculate the natural gas line extension allowance. This methodology allows Avista to make natural gas

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Date: December 7, 2018
Page 2 of 2

service more accessible, and the rebate helps with the costs incurred by switching from electric to natural gas.

If you have any questions about this filing, please contact me at (206) 389-3879 or via e-mail at SarahL2@atg.wa.gov.

Sincerely,

/s/ Sarah Laycock

SARAH E. LAYCOCK
Regulatory Analyst
Public Counsel Unit
(206) 389-3879

SEL/CM

Enclosure

cc: Service List (via E-mail)