

**Avista Corp.**

1411 East Mission P.O. Box 3727
Spokane, Washington 99220-0500
Telephone 509-489-0500
Toll Free 800-727-9170

September 6, 2022

Ms. Amanda Maxwell
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Docket U-210590 - Avista's Responses Related to Performance Metrics – Phase 1

Dear Ms. Maxwell:

Avista Corporation, dba Avista Utilities (Avista or the 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 U-210590 on August 5, 2022, regarding the development of a "policy statement addressing alternatives to traditional cost of service ratemaking".

Included with these comments is Avista's "Metric Proposal Template" (labeled "210590-AVA-Metric Proposal Template-09-06-22") which provides potential metrics for the Commission's consideration. Please note that for Goal 1/Outcome 2 "Utilities are prepared for and respond to outages and other impacts caused by cyber-attacks, significant events, wildfires, storms, extreme weather events, and other natural disasters", Avista did not propose a metric as the Company is not aware of an appropriate metric. In general, utilities should have detailed emergency operating plans to respond to issues noted in this goal/outcome. It should be the "bread and butter" of being an operating utility, so any metric would be either yes, a utility does have appropriate plans, or no, the utility does not. Answering no would not be beyond a performance issue; it would be a dereliction of duty problem.

If you have any questions regarding this filing, you can contact me at 509-495-8620 or patrick.ehrbar@avistacorp.com.

Sincerely,

/s/ *Patrick Ehrbar*

Patrick Ehrbar
Director of Regulatory Affairs