

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a
AVISTA UTILITIES,

Respondent.

DOCKETS UE-220053 and
UG-220054 (*Consolidated*)

**INITIAL POST-HEARING BRIEF
OF SMALL BUSINESS UTILITY
ADVOCATES**

**INITIAL POST-HEARING BRIEF OF
SMALL BUSINESS UTILITY ADVOCATES**

Small Business Utility Advocates (“SBUA”) respectfully submits the following initial post-hearing brief in connection with the above-captioned proceeding, which addressed the consolidated rate application of Avista Utilities (“Avista”). SBUA respectfully requests that the Commission adopt the Full Multi-Party Settlement Stipulation filed with the Commission on June 28, 2022 (“Stipulation”).

As SBUA witness James Wilson testified in the July 8, 2022 Joint Testimony in support of the Stipulation, SBUA contends that the Stipulation has a number of provisions that specifically benefit small commercial customers related to energy efficiency, reporting on disconnections for small businesses in disadvantaged communities, and developing metrics to identify gaps in small businesses participation in DER programs.

SBUA also supports the revenue requirement, rate design, and other provisions in the Stipulation, which in our opinion strike a reasonable balance between the interests of Avista

and the representatives of various customer classes, including small commercial customers.

Dated this 21st day of October, 2022.

Respectfully submitted,

/s/ Jennifer Weberski

Jennifer Weberski

Small Business Utility Advocates

548 Market St., Suite 11200

San Francisco, CA 94104

(703) 489-2924

jennifer@utilityadvocates.org

Attorney for SBUA