

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

DOCKET NO. UE-150204

DOCKET NO. UG-150205

EXHIBIT NO. ____ (KON-3)

KELLY O. NORWOOD

REPRESENTING AVISTA CORPORATION

**A Sampling of Compliance Requirements
Avista Corporation - 2015**

	Compliance Requirement	Jurisdiction	Fuel	Department	Reporting Frequency	Compliance Requirement Description
1	Clark Fork License	Federal Energy Regulatory Commission (FERC) and State agencies (Idaho & Montana)	Electric	Clark Fork Licensing	Annual, Periodic Committee Updates	Operation of the Clark Fork Project is conditioned by the Clark Fork Settlement Agreement and FERC License No. 2058. Avista must comply with the Clean Water Acts in Idaho and Montana. The Company is required to fund and/or implement defined Protection, Mitigation and Enhancement Measures (PM&Es) designed to offset ongoing impacts to aquatic, terrestrial, recreational and cultural resources associated with operation of hydroelectric projects. Additionally, Avista must submit the FERC Order Annual Report to document license implementation compliance activities.
2	Spokane River License	Federal Energy Regulatory Commission (FERC)	Electric	Environmental	<u>Three Levels</u> Annual - broad spectrum of plans and activities. Periodic - measures completed on a more or less frequent basis. Periodic Committee Updates	The Spokane River Project (FERC NO. 2545), effective 6/18/09, governs five of Avista's hydroelectric developments including Post Falls, Upper Falls, Monroe Street, Nine Mile and Long Lake. The License mandates operational and environmental obligations that address how Avista can operate these developments and what protection, mitigation and enhancement measures must be undertaken to address environmental impacts and our ongoing operations. The Spokane River License Implementation Group is responsible for managing the license conditions, in consultation with the federal, state, and/or local agencies having regulatory authority related to the Project. Consultation with the US Bureau of Indian Affairs, US Bureau of Land Management, US Forest Service, Idaho Department of Environmental Quality, Idaho Department of Fish and Game, Washington Department of Ecology, Washington Department of Fish and Wildlife, multiple counties, cities, and towns varies depending on the projects involved. Additional support is required of other Avista departments on an as needed basis. This is a 50-year license.
3	Hydro Electric Emergency Action Planning	Federal Energy Regulatory Commission (FERC)	Electric	Hydro Compliance	Annual	Five of Avista's seven hydroelectric projects, which are designated as "high hazard", are subject to FERC regulation that requires Avista to develop and file a site-specific Emergency Action Plan (EAP's) with the appropriate FERC Regional Engineer. An annual exemption filing is required for the other two plants. In addition to the written EAP's, the five high hazard dams are subject to annual drills and exercises that require training, testing, updating and reporting. These drills/exercises include participation by local, State and Federal emergency management personnel. Each five years, a comprehensive full-scale exercise must be conducted and the EAP must be reprinted.
4	Hydro Public Safety and Education	Federal Energy Regulatory Commission (FERC)	Electric	Hydro Compliance	Annual, Periodic	Under Section 10(c) of the Federal Power Act, Avista must maintain and operate its hydro projects for the protection of life, health, and property. Avista is required to create and maintain a site-specific Hydro Public Safety Plan. Additionally, Avista must provide safety devices, such as signs, lights, sirens, barriers or other safety devices as required by the FERC Regional Engineer. All accidents resulting in serious injury or death at or near a project must be reported to FERC.
5	Hydro Security	Federal Energy Regulatory Commission (FERC)	Electric	Hydro Compliance	Annual	In 2002, FERC began monitoring security measures at hydro projects. In 2010, licensed hydro projects were analyzed to assess each facility's level of vulnerability and likelihood of attack. Subsequently, seven of Avista's hydro projects are subject to security requirements set forth by FERC. Compliance requires development of site specific security plans, annual security assessment with input from local law enforcement, reporting, and security compliance certification letters (for Security Group 2 facilities). Compliance activities require support from Environmental Compliance, Environmental Affairs, and Generation Production and Substation Support.

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6	Tribal Provisions of Licensing Agreements	US Department of Interior, Various Tribes	Electric and Natural Gas	Native American Relations	Annual	Avista is subject to provisions of settlement agreements with the US Department of Interior, Spokane Tribe, Coeur d'Alene Tribe, and the Nez Perce Tribe in conjunction with its hydro licensing agreements. The provisions are specific to each Tribe. Requirements are related to past and future use of tribal land, establishment of management or coordinating committees, various annual payments, and employment.
7	Air Quality Compliance	Federal Environmental Protection Agency, State and Local Agencies	Electric	Environmental Compliance	Annual	The Clean Air Act (CAA) is a federal law designed to control air pollution on a national level. It establishes the basic structure for regulating discharges of air pollutants into the atmosphere. Avista operates 8 facilities that are subject to this regulation. The Environmental Compliance department provides continuous management to ensure obligations are met. This includes permitting, monitoring, testing, communication, reporting, training and certifications in accordance with the EPA, Idaho Department of Environmental Quality, Washington State Department of Ecology, Spokane Regional Clean Air Agency.
8	Water Quality Compliance	Federal	Electric	Environmental Compliance	Annual	The Clean Water Act (CWA) is the primary federal law in the US governing water pollution. Under this Act, Avista's Kettle Falls Generating Station is subject to the Environmental Protection Agency's (EPA) National Pollutant Discharge Elimination System (NPDES) program for which Avista must comply with specific discharge limits, monitoring and reporting requirements. The CWA also includes Spill Prevention, Control and Countermeasures (SPCC) regulations intended to prevent oil spills into navigable water. The Environmental Compliance department provides continuous management to ensure obligations are met. This includes permitting, monitoring, testing, communication, reporting, training and certifications related to the SPCC plans Avista must manage for 45 facilities across its service territory.
9	Hazardous and Non-Hazardous Waste Management	Federal	Electric	Environmental Compliance	Annual, Periodic	The Resource Conservation and Recovery Act (RCRA) is the principal federal law governing the treatment, storage, and disposal of solid waste and hazardous waste. It includes provisions for permitting, monitoring, testing and reporting. Under RCRA Subtitle D, Avista's Kettle Falls Generating Station wood ash landfill is subject to provisions governing management of nonhazardous industrial solid waste. Under RCRA Subtitle C, Avista must comply with "cradle to grave" hazardous waste requirements from the time it is generated until disposal. Subtitle C provisions apply to 12 of Avista's generating and operating facilities. Additionally, Avista is subject to the Toxic Substances Control Act of 1976 (TSCA) as it applies to the Spokane Service Center. The Environmental Compliance department provides continuous management to ensure obligations are met. This includes permitting, monitoring, testing, communication, reporting, training and certifications.
10	Avian Protection Measures	Federal Energy Regulatory Commission (Clark Fork Licensing), Federal and State Fish and Wildlife Agencies	Electric	Environmental Compliance	Annual, Periodic	The Migratory Bird Treaty Act (MBTA) is a federal law that enforces international conventions with Canada, Japan, Mexico and Russia to protect birds that migrate across international borders. Similarly, the Endangered Species Act is a domestic law that implements the US commitment to two international treaties that contain provisions for the protection of migratory birds. Avista manages compliance with all of these requirements through implementation of its Avian Protection Plan which includes, permitting, surveying, monitoring, reporting, public education, and development of nesting structures.

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11	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	Federal, State	Electric	Environmental Compliance	Annual, Periodic	The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), also known as Superfund, is the central part of the legislative framework for environmental protection. The Act gives authority to federal natural resource agencies, state, and Native American tribes to recover natural resource damages caused by releases of hazardous substances that may endanger public health or welfare or the natural environment. In compliance with this Act, Avista's Environmental Compliance department provides continuous management to ensure obligations are met. This includes permitting, monitoring, testing, communication, reporting, training and certifications for 8 Avista sites in various stages of property clean up.
12	Environmental Public Disclosure	Federal	Electric	Environmental Compliance	Annual, Periodic	The Emergency Planning and Community Right-to-Know Act (EPCRA) is intended to increase the public's knowledge of the presence and threat of hazardous chemicals as well as prepare the public to respond in the event of a chemical emergency. In compliance with this Act, Avista must compile specific information about hazardous chemicals that are held onsite and the threats posed by those substances. Avista must notify the appropriate state and local authorities if releases of certain chemicals occur. Avista provides public disclosures for 22 of its facilities.
13	North American Electric Reliability Corporation (NERC) - Reliability Compliance	Federal Energy Regulatory Commission (FERC)	Electric	Compliance	Ongoing	NERC Reliability Standards are mandatory and enforceable under the Section 215 of the Federal Power Act. FERC had jurisdiction over the Bulk Power System in the continental United States. FERC certified the NERC as the Electric Reliability Organization responsible to develop and enforce mandatory Reliability Standards. The Reliability Standards contain legal requirements for the operation, planning, maintenance and security of the Bulk Electric System (typically transmission facilities operated at 100kV and above and generation facilities exceeding 20MW single unit or 75MW aggregate). NERC delegates compliance oversight to eight Regional Entities across the US. WECC is Avista's Regional Entity and audits Avista every three years. Avista is also required to formally self-certify its compliance with NERC Reliability Standards annually. Avista's Compliance Department manages its internal compliance program for NERC Reliability in an oversight role. There are approximately 12 business units that must comply with over 100 Reliability Standards (over 1000 individual requirements) applicable to Avista.
14	Tribal Employment Rights Ordinances (TERO)	Federal Energy Regulatory Commission, Various Tribes	Electric and Natural Gas	Native American Relations	Not Applicable	Tribal Employment Rights Ordinances (TERO) is a sovereignty based employment rights program that provides American Indian preference in employment, training, contracting and sub-contacting of projects on the reservation. Avista (or its contractor) is required to work with five Tribes -- Confederated Salish and Kootenai Tribes of the Flathead Reservation, Spokane Tribe, Coeur d'Alene Tribe, Nez Perce Tribe and Confederated Tribes of the Colville Reservation -- to ensure compliance with unique compliance plans for each Tribe.
15	Prohibition on Energy Market Manipulation	Federal Energy Regulatory Commission (FERC)	Electric and Natural Gas	Natural Gas Supply, Power Supply	Not Applicable	The Energy Policy Act of 2005 granted FERC broad authority to monitor and enforce the prohibition of energy market manipulation. As described in 18 CFR Part 1c, it is unlawful for any entity to, directly or indirectly, use or employ any device, scheme, or artifice to defraud; to make any untrue statement of a material fact to omit to state a material fact; or to engage in any act, practice, or course of business that operates or would operate as fraud or deceit upon any entity. The FERC Compliance Manager conducts training for employees with transaction authority in energy markets to promote awareness of the prohibition. In 2014 a third party contractor helped create and also delivered the training.

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16	Market Behavior Rules	Federal Energy Regulatory Commission (FERC)	Electric and Natural Gas	Natural Gas Supply, Power Supply	Not Applicable	18 CFR Part 284.403 and Part 35.41 state that a seller engaged in reporting transactions to natural gas or electricity price index publishers must abide by the procedures in FERC's Policy Statement on Natural Gas and Electric Price Indices. A seller must (1) notify FERC as to whether Avista reports sales information to publishers of price indices (done annually on FERC Form 552 for natural gas and quarterly on the EQR for electricity); and (2) if Avista does such reporting, report its transactions in accordance with FERC's Policy. All market-based sellers must notify FERC of any changes in their transactions reporting status within 15 days. Sellers must retain all data and information for sales of natural gas and electricity for a period of five years. Sellers must not submit false or misleading information, or omit material information, in any communication with FERC.
17	Preservation of Records	Federal Energy Regulatory Commission (FERC)	Electric and Natural Gas	Power Supply; Natural Gas Supply	Not Applicable	18 CFR 125.3 addresses regulations governing the preservation of records by public utilities (including Avista) subject to FERC jurisdiction and by licensees holding licenses issued by FERC. A retention schedule is published and documents are managed according to the schedule.
18	Dodd-Frank Act Financial Reform of OTC swaps and derivatives - Title VII	Commodity Futures Trading Commission	Electric and Natural Gas	Power Supply, Natural Gas Supply, Energy Resources Risk Management, Compliance Department	Varies with activity; at least annually.	The Dodd-Frank Act was enacted in 2010. Since then the Commodity Futures Trading Commission (CFTC) has developed rules in 17 CFR Parts 43, 45, 46 and under amendments to the Commodity Exchange Act for mandatory clearing and margining OTC swaps and derivatives. Avista uses swaps in energy optimization and has recordkeeping, reporting, and position limits obligations. Business Conduct Standards with swap dealers include margining and know your counterparty provisions. Avista has registered for a Legal Entity Identifier for reporting swaps, has registered with two Swap Data Repositories (SDR), and has modified the Nucleus trade capture system to capture additional swap data. Avista qualifies for the annual end-user exception to mandatory clearing, and is required to secure the Board of Directors approval and make such representation to the SDRs.
19	Standards of Conduct Rules	Federal Energy Regulatory Commission (FERC)	Electric	Power Supply, Transmission Services	Self reports or OASIS postings as needed	In Order No. 2004, final rule in 2003 and codified in 18 CFR Part 358, FERC has prohibited transmission providers from giving undue preference to their affiliated marketing department so that transmission service are provided in a non-discriminatory manner. There must be functional separation and independence between the transmission and marketing functions, no person may be used as a conduit for disclosing non-public transmission information to the affiliated marketing department, the transmission provider must provide annual training on the standards of conduct to affected employees, and the transmission provider must designate a chief compliance officer.
20	Open Access Transmission Tariff (OATT)	Federal Energy Regulatory Commission (FERC)	Electric	Transmission Services	Tariff Revisions and Compliance Filings as needed	In Order No. 888 (Final Rule in April 1996, with regular amendments), FERC requires all public utilities (including Avista) that own, control, or operate facilities for transmitting electric energy in interstate commerce to have an OATT on file with the goal of removing impediments to competition in the wholesale power marketplace. FERC amends its regulations and the pro-forma OATT adopted in Order No. 888 to remedy opportunities for undue discrimination and address deficiencies that may subsequently become apparent. Order No. 1000 "Transmission Planning and Cost Allocation" required OATT revisions to describe the regional and inter-regional processes for transmission planning and cost allocation. Avista has made five tariff filings with regard to Order 1000. Other illustrative tariff filings include Order 764 "Integration of Variable Energy Resources" and Order 784 "Third Party Provision of Ancillary Services". FERC may require a compliance filing of a transmission provider's OATT whenever a rulemaking becomes effective.

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21	Open Access Same-Time Information Systems (OASIS) and The North American Energy Standards Board (NAESB)	Federal Energy Regulatory Commission (FERC)	Electric	Transmission Services	Monthly, Quarterly, As Required	FERC Order 889 (Final Rule in May 1996 and 18 CFR Part 37) require potential customers of open access transmission service to receive access to information that will enable obtaining transmission service on a non-discriminatory basis from any Transmission Provider. The OASIS gives all users of the open access transmission system access to the same information by electronic means. Part 37.6 lists the required information that all Transmission Providers must post and maintain on OASIS. FERC relies on NAESB to maintain the specifications for OASIS. The Transmission Services department is responsible for making the required postings, and the FERC Compliance Manager monitors compliance with this regulation.
22	Natural Gas Control Room / Dispatching Management Rules for Avista's Natural Gas Local Distribution Company	Pipeline and Hazardous Materials Safety Administration, US Department of Transportation, State Commissions	Natural Gas	Distribution Dispatch	Per Event, Monthly, Quarterly, Annual	Federal and State requirements regarding the operations of natural gas systems and the control room / dispatching rules and procedures for the monitoring, reporting, alarming, and emergency response of such a natural gas system. Also include training, hours and fatigue rules of shift workers, and records management requirements.
23	Natural Gas Distribution Integrity Management Plan (DIMP)	Pipeline and Hazardous Materials Safety Administration, US Department of Transportation, State Commissions	Natural Gas	Gas Compliance	Per Event, Monthly, Quarterly, Annual	Federal and State requirements regarding the operations and asset management of natural gas distribution pipelines. Requires the development and execution of a risk based methodology and implementation program to identify natural gas pipeline integrity risks, to implement and coordinate asset management response plans. Intent is to increase the reliability and safety of our natural gas distribution pipelines.
24	Natural Gas Transportation Integrity Management Plan (TIMP)	Pipeline and Hazardous Materials Safety Administration, US Department of Transportation, State Commissions	Natural Gas	Gas Compliance	Per Event, Monthly, Quarterly, Annual	Federal and State requirements regarding the operations and asset management of natural gas transportation pipelines (i.e., high pressure) in defined high consequence locations. Requires the development and execution of a risk based methodology and implementation program to identify natural gas pipeline integrity risks, to implement and coordinate asset management response plans. Intent is to increase the reliability and safety of our natural gas transportation pipelines.
25	Natural Gas System Design, Construction, Maintenance and Emergency Operations	Pipeline and Hazardous Materials Safety Administration, US Department of Transportation, State Commissions	Natural Gas	Gas Operations	Per Event, Monthly, Quarterly, Annual	Federal and State requirements regarding the design standards, construction specifications and guidelines, operational parameters, maintenance requirements and schedules, inspection requirements and schedules, and emergency operations rules, procedures, and reporting obligations for our entire natural gas system. This includes the engineering specifications, to cathodic protection, and gas leak surveying. Also includes our emergency response procedures and field guides.
26	Integrated Resource Plan	Washington Utilities and Transportation Commission (WUTC), Idaho Public Utilities Commission (IPUC), Oregon Public Utility Commission (OPUC)	Natural Gas	Natural Gas Resources	Biennial	This process is undertaken by Avista, and contributing external parties, to ensure the Company's Natural Gas Integrated Resource Plan (IRP) identifies a strategic natural gas resource portfolio to meet customer demand requirements over the next 20 years. The primary focus of the IRP is meeting customers' needs under peak weather conditions. This process also provides a methodology for evaluating customer needs under normal or average conditions. Avista files an Integrated Resource Plan (IRP) every two years with the WUTC, OPUC and the IPUC.
27	Natural Gas Transactions - Annual Report	Federal Energy Regulatory Commission (FERC)	Natural Gas	Natural Gas Supply	Annual	The Energy Policy Act of 2005 amended Section 23 of the Natural Gas Act to provide price transparency in the natural gas market. Participants engaging in physical natural gas sales or purchases of 2,200,000 MMBtus or more for the previous year are required to file FERC Form 552.

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28	Natural Gas Transportation and Storage - Capacity Release Rules	Federal Energy Regulatory Commission (FERC)	Natural Gas	Natural Gas Supply	Not Applicable	FERC has identified, through various cases, key principles for shippers with respect to the transportation of natural gas in interstate commerce. The principles are to prevent circumvention of FERC's capacity release policies. The principles include: 1) The shipper must have title to the gas that it ships through its capacity; 2) The prohibition against buy/sell transactions; 3) The prohibition against (compensation) tying arrangements; and 4) Prohibition against (affiliate) flipping arrangements.
29	Natural Gas Imports and Exports	US Department of Energy, Office of Fossil Energy; Canadian National Energy Board	Natural Gas	Natural Gas Supply	Monthly	Avista is required to have a series of licenses and permits in place to authorize the import and export of natural gas from various US and Canadian regulators. The Natural Gas Act of 1938 requires any US person importing or exporting natural gas to obtain authorization from the Department of Energy. The US DOE Office of Fossil Energy requires monthly reporting of transactions for imports and exports; the National Energy Board requires monthly import and export reporting; and the Alberta Energy Regulator requires a monthly gas removal permit statement to be filed. 15 CFR Part 30 requires information on natural gas exports to be reported monthly through the US Census Bureau Automated Export System portal.
30	Oregon Energy Supplier Assessment	Oregon Department of Energy	Natural Gas	Rates and Tariffs	Annual	Oregon Revised Statute 469.421(8) describes the requirement for energy resource suppliers to pay an annual assessment to fund the activities of the Oregon Department of Energy. On or before May 1 of each year, energy resource suppliers must provide the department a verified statement of gross operating receipts from sales or services made or provided within Oregon. Results of Operations are used to fill out the required revenue information. The report is certified by Avista and mailed to Oregon Department of Energy. An Order is issued by the legislature and the invoice is sent to Avista for payment.
31	Greenhouse Gas Compliance Report	Oregon Public Utility Commission	Natural Gas	Facilities Management, Fleet Services, Natural Gas Resources	Biennial (even years)	In compliance with OAR 860-085-0050, Avista is required to submit a report to the Oregon Public Utility Commission in even numbered years presenting estimates of, analysis methods used, and assumptions made in estimating the impacts to customer rates for meeting the following Oregon energy consumption based Greenhouse Gas emission reduction goals by January 1, 2020 under ORS 768A.205: (a) Ten percent below 1990 levels; and (b) fifteen percent below 2005 levels. Results for this report are specific to Avista's operating facilities (i.e., office buildings) and vehicle fleet.
32	Utility Pole Attachments	Federal Communication Commission, National Electric Safety Code, Washington Utilities and Transportation Commission, Idaho Public Utilities Commission	Electric	Construction	Per Event, Annual	Federal and State requirements concerning the rates, terms and conditions imposed by utilities to other service providers who access the utilities poles, ducts, conduits and rights-of-way. Access must be provided in a non-discriminatory manner. Includes dispute resolution, inspections, and remediation requirements. Avista permits community use of poles for attachment of banners and sign in accordance to Federal design and installation requirements.
33	Franchise Agreements	Local (City, County)	Electric and Natural Gas	Energy Solutions	Upon Renewal of Agreements	Franchise agreements are established with cities and counties throughout Avista's service territory. Local governments, through the use of these agreements, policies, ordinances, permits and fees, impose rules and regulations which direct how Avista operates its business in public rights of way. Avista has more than 250 franchise agreements and pays several million dollars annually in various utility taxes and franchise fees.

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34	Electric Service Reliability Report	Washington Utilities and Transportation Commission	Electric	Electric Distribution, Distribution Operations Management, Asset Management	Annual	In compliance with WAC 480-100-398, Avista must file an electric service reliability report with the Washington Utility and Transportation Commission at least once per year. Avista's filing requirement is on or before April 30th of each year. The report must meet the following conditions: (1) be consistent with the Company's electric service reliability monitoring and reporting plan filed under WAC 480-100-393; (2) must address any changes the utility made in the collection of data and calculation of reliability information after its initial baselines were set; (3) must identify geographic areas of greatest reliability concern, explain their causes, and how Avista plans to address them; and (4) must identify the number of customer complaints about reliability and power quality made to the utility during the year, and must distinguish complaints about sustained interruptions and power quality. Beginning in 2016 the Electric Service Reliability Report will also include the results of the Company's Service Quality Measures Program, Electric Schedule 85 and Natural Gas Schedule 185. As ordered in the Company's 2014 General Rate Case, Avista filed tariffs for a Service Quality Measures program, which was approved by the WUTC effective July 1, 2015.
35	Fuel Mix Disclosure	Washington Utilities and Transportation Commission, Idaho Public Utilities Commission	Electric	Customer Solutions and Rates and Tariffs	Biannual (WUTC) Annual (IPUC)	Issued biannually (Washington) and annually (Idaho) via the Company's "Avista Connections" (an information source for Avista's customers) publication. Information is disclosed as data is received from the state's Department of Commerce.
36	Electric Substation Security	National Electric Safety Code, American National Standards Institute	Electric	Generation, Production and Substation Support	Per Event, Monthly	Federal design and planning requirements concerning the physical security of distributed electrical equipment (namely substations and other electrical equipment). Includes the required signage and other notices and physical deterrents to promote and enhance public safety. Construction and ongoing maintenance and records keeping is also required under these rules.
37	Electric Market-Based Rate Authorization	Federal Energy Regulatory Commission (FERC)	Electric	Power Supply	Triennial, As Required	Final Rule Order No. 697 (2007), and its progeny, detail the policies FERC has adopted to award market based rate authorization to sellers of electric energy, capacity, and ancillary services in interstate commerce. Sellers must demonstrate a lack of market power in a triennial study and compliance filing. Other conditions of maintaining market based rate authorization include filing tariffs via the ETariff program, timely change of status notification, and filing Electric Quarterly Reports.
38	Marketing Function Use of Affiliate Transmission	Federal Energy Regulatory Commission (FERC)	Electric	Power Supply	Not Applicable	As a native load serving entity transmission customer of Avista's transmission system, the Power Supply marketers and schedulers follow the procedures in OATT Sections 13, 14, 16 through 18, and 23 (Point to Point Transmission Service) and Sections 28 through 30 (Network Integration Transmission Service) in a manner comparable to a network transmission customer. The OASIS is used for transmission service requests, resources are designated for native load and temporarily undesignated to make third party sales, and resource designation forms are completed and provided to Transmission Services. The appropriate NERC priority for transmission service is used on all requests and transmission tags to move power to and from Avista's system and remote generation. These processes are monitored by the FERC Compliance Manager and any exceptions are reviewed with management. The Nucleus trade capture system has been repeatedly modified to provide tools to ensure compliance with the requirements. Three OATT training modules have been created and are required training for Power Supply marketers and schedulers, and are optional for other Power Supply personnel.

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39	Procedures for Shortages of Electric Energy and Capacity under the Public Utility Regulatory Policies Act (PURPA)	Federal Energy Regulatory Commission (FERC)	Electric	Power Supply	As Required	Enacted in 1979, and amended in 1982, 1984, 1989, 1995, and 2005, 18 CFR Part 294 requires reporting to FERC, to any State regulatory authority, and to firm wholesale customers, any anticipated shortage of electric energy or capacity. The intent is to provide FERC with advance notice of energy or capacity shortages. In practice, such conditions usually occur in real-time and the NERC Energy Emergency Alert Protocol is followed.
40	Integrated Resource Plan	Washington Utilities and Transportation Commission (WUTC), Idaho Public Utilities Commission (IPUC)	Electric	Power Supply	Biennial	The Integrated Resource Planning (IRP) process is undertaken by Avista, and external public contributors, to ensure a diverse energy mix (hydro, natural gas, coal, wind and biomass) is identified and mapped for deployment over a 20 year horizon. Avista files an IRP every two years with the WUTC and the IPUC. The 18-month process that precedes each filing involves a Technical Advisory Committee and a public comment period. Avista's most recent electric IRPs were filed in Washington and Idaho in August 2013.
41	Electricity Imports and Exports	US Department of Energy, Energy Information Administration	Electric	Power Supply, Resource Accounting	Quarterly	Effective January 1, 2015, the Department of Energy's Energy Information Administration requires each entity importing or exporting electricity from or to Canada and Mexico to report the transactions through the EIA Data xChange Portal for Form 111. This form expanded the historical export reporting requirement to include imports. The Nucleus trade capture system was modified to report the transmission tag numbers for imports and exports to ensure completeness.
42	WUTC and Dept of Commerce, Trade and Economic Development (CTED) Renewable Resource Report	Washington RCW/WAC, Washington Utilities and Transportation Commission (WUTC), Department of Commerce	Electric	Power Supply	Annual	Per RCW 19.285 and WAC 480-109, Avista must submit an annual report on or before June 1st each year, which details the resources the utility has acquired or contracted to acquire to meet its renewable resource obligation for the target year. The annual renewable portfolio standard report must include the utility's annual load for the prior two years, the total number of megawatt-hours from eligible renewable resources and/or renewable resource credits the utility needed to meet its annual renewable energy target by January 1st of the target year, the amount (in megawatt-hours) of each type of eligible renewable resource used, and the amount of renewable energy credits acquired.
43	Rate Schedules and Tariffs; ETariff Program and Electric Quarterly Reports	Federal Energy Regulatory Commission (FERC)	Electric	Power Supply, Transmission Services	Tariff revisions as needed; Quarterly	18 CFR Part 35 Subpart A requires electronic filing of tariffs and related materials through FERC's ETariff program, and filing of Electric Quarterly Reports (EQR) for all sales transactions under any FERC approved tariff. The ETariff program was implemented in 2010 and Avista uses a hosted software application to comply with the ETariff filing format requirements. The EQR program was implemented in 2001 with a major revision to the filing format and process in 2014. The Nucleus trade capture system was modified for the EQR revisions. The FERC Compliance Manager is the subject matter expert for compliance filings in these areas. Collaboration with Legal, Transmission Services, Resource Accounting, ER Risk Management, and wholesale marketers is required.

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44	Hourly Balancing Authority Operating Data Submission	US Department of Energy, Energy Information Administration	Electric	Power Supply, Transmission Services, Energy Resources Risk Management	Hourly and Daily	Effective March 1, 2015, the Department of Energy's Energy Information Administration requires each Balancing Authority Area listed in the NERC Compliance Registry to submit basic operating data on an hourly and daily interval. Daily data submission by 7:00 am ET: The prior day's hourly demand, net generation, and total net actual interchange; the prior day's hourly day-ahead demand forecast for the current day; and the actual net interchange with each directly connected balancing authority area from two days prior. Hourly same-day submission: Hourly demand within 60 minutes of the end of each reported operating hour. The Nucleus applications for Transmission and Energy Resources were modified to capture the data as prescribed by the EIA and automated reports were built to create the hourly and daily data submission. A GlobalScape file transfer process was created to automatically upload the data files to the EIA internet site.
45	Renewable Energy Certificate - Review and Tariff Filing	Washington Utilities and Transportation Commission	Electric	Rates and Tariffs	Annual Filing, Quarterly Reporting	Through its tariff Schedule 98, Avista is required to credit the net benefits from the sales of Renewable Energy Credits (RECs) to customers. An annual rate adjustment will be effective July 1, 2016, and annually thereafter. Avista files updates on the status of the REC deferral balance with its quarterly Energy Recovery Mechanism (ERM) filing.
46	Bonneville Power Administration Residential Exchange Program	Bonneville Power Administration (BPA), Washington Utilities and Transportation Commission (WUTC) and Idaho Public Utilities Commission (IPUC)	Electric	Rates and Tariffs	Annual Filing, Review and Periodic Updates	Avista participates in BPA's Residential Exchange Program pursuant to Section 5(c) of the Pacific Northwest Electric Power Planning and Conservation Act, 16 U.S.C SS 839c(c). In order to determine the Residential Exchange benefits for customers, the Company files a Average System Cost Report every other year and is subject to a rigorous review with BPA to determine Avista's share of the exchange benefits. Avista also is required to file an informal informational filing with BPA every other year (the years a formal filing is not made) in order to keep BPA aware of current costs. After BPA has determined Avista's share of Residential Exchange Benefits, Avista then files with both the WUTC and the IPUC to update the BPA rate schedules in order to apply the credit to customers.
47	Budget Compliance Filing	Washington Utilities and Transportation Commission (WUTC)	Electric and Natural Gas	Rates and Tariffs	Annual Filing and semi annual filing	Avista files an annual budget of expenditures report with the WUTC pursuant to WAC 480-140. This incorporates the current year's budget for Electric and Natural Gas Expenditures, AFUDC and large Capital projects. Avista also files a semi annual Capital Progress Report with the WUTC pursuant to Order No. 05, Docket Nos. UE-140188 & UG-140189 (Consolidated). Avista agreed to provide semi-annual reporting of 2014 and 2015 capital expenditures.
48	Smart Grid Technology Report	Washington Utilities and Transportation Commission (WUTC)	Electric	Engineering, Rates and Tariffs	Biennial (even years)	Washington electric utilities (including Avista) have been required to file a smart grid technology report with the WUTC since September 1, 2010. Subsequent reports are filed no later than September 1st of each even-numbered year through September 2016.
49	Natural Gas Operator Qualification Regulations	Pipeline and Hazardous Materials Safety Administration, US Department of Transportation, State Commissions	Natural Gas	Human Resources	Per Event, Monthly, Quarterly, Annual	Federal and State requirements for training, certification, and records management of natural gas field workers. Avista is required to develop and implement a program to ensure its workers are properly trained and certified in all aspects of their pipeline operations. This Operator Qualification program includes recurring certification requirements and inspections with an overall objective to reduce the potential for pipeline accidents that are attributable to human error.
50	Natural Gas System Public Awareness Program	Pipeline and Hazardous Materials Safety Administration, US Department of Transportation, State Commissions	Natural Gas	Human Resources	Per Event, Monthly, Quarterly, Annual	Federal and State requirements regarding safety, emergency response, and damage prevention rules. Avista is required to develop and implement a Public Awareness Program designed to increase public safety in and around our natural gas system. Program requirements are comprised of public education, emergency responder liaison activities, and damage prevention.

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	Compliance Requirement	Jurisdiction	Fuel	Department	Reporting Frequency	Compliance Requirement Description
51	Utility Worker Safety and Incident Prevention Program	Occupational Safety and Health Administration, Washington Industrial Safety and Health Act, National Electric Safety Code, US Department of Labor, US Department of Transportation, State Utility Commissions	Electric and Natural Gas	Human Resources	Per Event, Monthly, Quarterly, Annual	Federal and State requirements regarding electric and natural gas worker safety and health requirements (including contractors/vendors/visitors). Includes worker and supervisor requirements of workplace hazard recognition, incident reporting requirements, proper use of personal protective equipment, regular hearing and respiratory testing, fall protection, extended work hour conditions, lead and asbestos and other hazardous material guidelines. Requirements include the development, training, implementation, monitoring, and reporting of these safety and health procedures in response to their regulatory requirements.
52	Bureau of Apprenticeship Standards for Craft Workers	US Department of Labor, State Commissions, State Laws	Electric and Natural Gas	Human Resources	Per Event, Monthly, Quarterly, Annual	Includes Federal and State requirements regarding the development and implementation of apprenticeship programs in order to develop skilled and proficient members of the craft trades at Avista. It also includes requirements for specific on-the-job learning, practical work experiences, and related instructional materials and training course requirements. Programs must also ensure compliance with applicable employment and labor related requirements such as equal employment opportunities and affirmative action.
53	Employer Workplace Related Compliance Requirements	US Department of Labor, Office of Federal Contract Compliance Programs, US Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA), State Laws, Federal Laws, Avista Policies	Electric and Natural Gas	Human Resources	Per Event, Monthly, Quarterly, Annual	Applicable compliance categories include: Equal Employment Opportunity Commission (EEOC) -Affirmative Action (AA) -Americans with Disability Act (ADA) -Employment Practices (Recruitment, Selection & Hiring, Promotions, and Severance) -Veterans Employment and Training Service (VETS) -Substance Abuse (CDL and PHMSA Pipeline) -Uniformed Services Employment and Reemployment Rights Act (USERRA) -Worker Adjustment and Retraining Notification Act (WARN) -Avista Core Policies
54	Commercial Vehicle Requirements	US Department of Transportation, Other Federal, State, and County agencies	Electric and Natural Gas	Fleet Services	Per Event, Weekly, Monthly, Quarterly, Annual	Federal, State, and County requirements of commercial vehicles concerning vehicle registrations, emission testing, licensing, trip permits, mileage reporting for fees and taxes, hazardous materials registrations and permits, records of inspections, repairs, and maintenance. Also includes commercial vehicle driver requirements such as pre-trip and post-trip inspections, emergency equipment and other cargo inspections, and hazardous material inspections.
55	Commercial Equipment Requirements	US Department of Transportation, Other Federal, State, and County agencies	Electric and Natural Gas	Fleet Services	Per Event, Weekly, Monthly, Quarterly, Annual	Federal and State requirements concerning the scheduling, performance, and records keeping of inspections, repairs, and maintenance for certain classes of equipment that may be physically mounted on commercial vehicles such as booms, cranes, and digger derricks, as well as certain freestanding types of manlifts.
56	Fleet Mechanic and Driver Qualifications	US Department of Transportation, Other Federal, State, and County agencies	Electric and Natural Gas	Fleet Services	Per Event, Weekly, Monthly, Quarterly, Annual	Federal and State requirements applicable to the training, certifications and record keeping of mechanic and driver qualifications for commercial vehicles and related equipment (including third party verification of vendor qualifications).

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57	Cranes, Lifts and Aerial Device Testing and Inspection	Occupational Safety and Health Administration, Washington Industrial Safety and Health Act, Washington Utilities and Transportation Commission, US Department of Labor	Electric	Generation, Production and Substation Support	Per Event, Monthly, Annual	Federal and State requirements applicable to the scheduling, performance, and records keeping of inspections, repairs, and maintenance for certain classes of equipment that may be used in the field such as vehicle mounted booms, freestanding cranes, as well as certain freestanding types of manlifts.
58	Financial Reporting (Sarbanes-Oxley "SOX" Implementation)	Security Exchange Commission (SEC), Department of Labor	Electric and Natural Gas	Corporate Accounting	Per Event, Quarterly, Annual	Avista is required to prepare and file SEC financial reports including the 10-K, 10-Q, 11-K and 8-K on an annual or quarterly basis as mandated. Avista is also required to design effective controls and procedures over financial reporting and evaluate the effectiveness of such controls and procedures on a quarterly and/or annual basis. Design and testing of the controls/procedures involves nearly all of Avista's business units.
59	Regulatory Financial Reporting	Federal Energy Regulatory Commission (FERC), Washington Utilities and Transportation Commission, Idaho Public Utilities Commission, Oregon Public Utility Commission and Montana Public Service Commission	Electric and Natural Gas	Corporate Accounting	Quarterly, Annual	Avista must maintain its financial books in accordance with the Uniform System of Accounts prescribed for public utilities and licensees subject to the Federal Power Act plus the Natural Gas Act prescribed for natural gas companies. Compliance includes filing of FERC Form 1, Form 2, and/or Form 3Q as required by FERC and state financial reports for Washington, Idaho, Oregon and Montana.
60	Corporate Structure, Governance, Registrations, Licensing, and Public Listing Requirements	Securities and Exchange Commission (SEC) New York Stock Exchange (NYSE) State Laws	Electric and Natural Gas	Corporate Secretary	Per Event, Quarterly, Annual	Federal and State requirements regarding the operating requirements and reporting obligations as a Publicly Traded Investor Owned Utility. NYSE, SEC, and State rules concerning Governance, Structure, Licensing, Operations, Reporting, and Records Keeping requirements (articles of incorporation, bylaws, board of director responsibilities, proxy and shareholder rights and responsibilities, board and officer reporting obligations, etc.).
61	Budget of Expenditures Report/Construction Filing	Oregon Public Utility Commission	Natural Gas	Finance, Budget and Forecast	Annual	A Budget of Expenditures Report must be submitted by Avista (and all energy utilities), operating within the State of Oregon in accordance with Oregon Revised Statute 757 .105.
62	Securities Issuance Reporting	Washington Utilities and Transportation Commission, Idaho Public Utilities Commission, Oregon Public Utility Commission	Electric and Natural Gas	Finance and Treasury	As Required	Avista must submit a written compliance report detailing the financing activity to the Washington Utilities and Transportation Commission, Idaho Public Utilities Commission, and Oregon Public Utility Commission after any financing.
63	Insider Trading	Securities and Exchange Commission (SEC), Department of Labor	Electric and Natural Gas	Legal	As Needed (per significant event)	Regulation Fair Disclosure is an issuer rule passed by the SEC which prohibits selective disclosure in an effort to prevent insider trading. It mandates that all publicly traded companies must disclose material information to all investors at the same time. The laws prohibit the purchase or sale of a company's securities by persons who are aware of material information about that company that is not generally known or available to the public and it prohibits persons who are aware of such information from disclosing this information to others who may trade.

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	Compliance Requirement	Jurisdiction	Fuel	Department	Reporting Frequency	Compliance Requirement Description
64	Standards of Professional Conduct for Attorneys	Securities and Exchange Commission (SEC)	Electric and Natural Gas	Legal	Not Applicable. New attorney training is required and annual re-training of all Avista attorneys is performed	As a result of the Sarbanes-Oxley Act of 2002, the SEC established standards of professional conduct for attorneys (in-house or outside counsel) who appear and practice before the SEC. Under Section 12 of the Securities Act of 1934, attorneys who become aware of evidence of a material violation by Avista or by an officer, director, employee or agent, are required to report the violation internally to Avista's General Counsel (GC) or to both the GC and CEO immediately. If the attorney believes an appropriate and timely response has not occurred, the attorney must report the misconduct to the audit committee or another appropriate committee of Avista's board of directors.
65	Regulation Fair Disclosure (Section 16)	Securities and Exchange Commission, Department of Labor	Electric and Natural Gas	Legal	Annual	Section 16 of the Securities Exchange Act of 1934 governs various regulatory filing responsibilities that must be met by directors, officers, and principal stockholders. Every person who is directly or indirectly the beneficial owner of more than 10% of the company or who is a director or an officer of the issuer of such a security, must file statements with the SEC as required.
66	Earnings Tests	Washington Utilities and Transportation Commission, Idaho Public Utilities Commission, Oregon Public Utility Commission	Electric and Natural Gas	Rates and Tariffs	Annual, as requested	As part of established Commission orders in Washington, Idaho and Oregon Avista is subject to earnings tests. For Idaho, the test is related to the 2012-2014 rate plan. For Washington, the test is related to the decoupling mechanisms. These calculations are prepared in coordination with other Avista departments, to ensure proper accounting and budgeting.
67	Energy Recovery Mechanism Purchased Gas Adjustment Power Cost Adjustment	Washington Utilities and Transportation Commission, Idaho Public Utilities Commission, Oregon Public Utility Commission	Electric and Natural Gas	Rates and Tariffs	Monthly, Annual	The Purchase Gas Adjustments (PGA), Washington's Energy Recovery Mechanism (ERM) and Idaho's Power Cost Adjustment (PCA) provide an avenue for Avista to estimate energy and demand charges, and defer the difference between the actual costs and the estimated costs for future recovery (subject to sharing limitations and expense level triggers). The ERM was originally adopted as part of a settlement agreement in 2002 whereas the PCA and PGAs in all 3 states have been dating back to at least 1992. Monthly and annual reports are filed as part of the ERM, PCA, and PGAs in Washington, Idaho and Oregon.
68	Major Shareholders List Filing	Oregon Public Utility Commission	Electric and Natural Gas	Rates and Tariffs	Annual	Avista is required to submit a written report to the Oregon Public Utility Commission by March 1 of each calendar year. The report must list Avista's major shareholders and their respective percentages of beneficial ownership of the energy utility and parent(s), to the extent such information is then known to management of the Company. If there are no major shareholders, the report must state that there are none. Information in the report must be current as of December 31 for the previous year or a more recent date if so specified in Avista's report.
69	Commission Basis Reporting	Washington Utilities and Transportation Commission	Electric and Natural Gas	Rates and Tariffs	Annual	Per WAC 480-100-257 & 480-90-257 Commission Basis Reports (CBRs) are required to be filed annually within four-months of the end of Avista's fiscal year, providing the actual electric and natural gas operations/utility earnings under "normal" conditions. The CBRs report Avista's annual utility operations, adjusted to remove the variations in consumption due to temperature and power supply conditions. Other adjustments to operations include the removal of out-of-period expenses, non-recurring and non-operating expenses, and items that distort the earnings or rate base.

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70	Results of Operations Reports	Washington Utilities and Transportation Commission	Electric and Natural Gas	Rates and Tariffs	Quarterly	Per WAC 480-100-275, within sixty days of the end of each quarter, Avista is required to file a report of actual results for its Washington operations. The results of the operations report must contain each of the three monthly balances and the latest twelve months' ending balance for all accounts of the uniform system of accounts. The report must include the average customer count and total unit sales per customer class for each reported period.
71	Registration and Issuance of Securities	Securities and Exchange Commission, Washington Utilities and Transportation Commission, Idaho Public Utilities Commission, Oregon Public Utility Commission	Electric and Natural Gas	Treasury	Quarterly	Security and Exchange Commission (SEC) authority is required for securities (debt or equity) to be issued by Avista publicly. State commission authorization is also required for any securities to be issued. Reporting requirements include SEC Forms 10-K and 10-Q (and others) and state reports that provide details of securities issued and use of proceeds.
72	Management and Oversight of Employee Benefits Investments	Dept of Labor, Internal Revenue Service, Employee Retirement Income Security Act of 1974, Pension Protection Act of 2006, other laws and regulations.	Electric and Natural Gas	Treasury	Quarterly, Annual	The Department of Labor and Internal Revenue Service require plan sponsors or administrators (including Avista) to report on their employees benefits plans utilizing Form 5500. This is to ensure that employee plans are operated in accordance with prescribed standards. Sponsors with defined contribution and defined benefit pension plans may be required to file additional information with the Internal Revenue Service by completing Form 5330. Additionally, employee benefits litigation and case law has evolved to place increasing demands on plan sponsors.
73	The Energy Independence Act - DSM Target Reporting to the Washington Utilities and Transportation Commission (WUTC)	Washington Utilities and Transportation Commission	Electric	Demand Side Management	Biennial	Since 2010, and every two years thereafter, Avista has been required to file a report with the WUTC identifying their ten-year achievable conservation potential and biennial conservation target. Participation by the WUTC's staff, and the public, in the development of the ten-year conservation potential and the two-year conservation target is an essential element of the process. Failure to comply with energy efficiency standards will result in penalties of at least \$50 per MWh being assessed against a utility for each MWh it is deficient in meeting the standard.
74	Demand-Side Management (DSM): Funding, Cost-Effectiveness, Reports and Filing	Washington Utilities and Transportation Commission, Idaho Public Utilities Commission	Electric and Natural Gas	Demand Side Management	Quarterly	As an integral part of its Demand Side Management (DSM) Program, Avista is responsible for monitoring and evaluating electric (kWh) and natural gas (therm) conservation results. Responsibility for maintaining its Tariff Rider also includes regular reporting that details the amount of energy conserved and the cost-effectiveness of those savings. A report of energy conservation results achieved each quarter is distributed to the DSM Advisory Group.
75	Energy Efficiency Annual Report	Oregon Public Utility Commission	Natural Gas	Demand Side Management	Annual	Annually, Avista submits a report to the Oregon Public Utility Commission Staff, which contains the results of the Company's Demand Side Management (DSM) program from the prior year. The report includes both year-end budget information and actual natural therm savings for its DSM program. The report is filed annually on or before April 30th. This report is a courtesy filing provided to the Commission Staff and is not a required filing.
76	Annual Conservation Plan (ACP)	Washington Utilities and Transportation Commission (WUTC)	Electric and Natural Gas	Demand Side Management, Rates and Tariffs	Biennial (even years)	Avista must file an annual conservation plan with the WUTC that describes any changes to its program. This filing occurs within the same docket as its current biennial conservation plan which also describes any changes to program details and its annual budget.

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	Compliance Requirement	Jurisdiction	Fuel	Department	Reporting Frequency	Compliance Requirement Description
77	Annual Conservation Report (ACR)	Washington Utilities and Transportation Commission (WUTC)	Electric and Natural Gas	Demand Side Management, Rates and Tariffs	Annual	Avista is required to file its ACR, with the WUTC, in the same docket as its current biennial conservation plan (an annual conservation report regarding its progress in meeting its conservation target during the preceding year). The annual conservation report must include, but is not limited to: The biennial conservation target; planned and claimed electricity savings from conservation, including a description of the key sources of variance between the planned and actual savings, budgeted and actual expenditures made to acquire conservation through the conservation cost recovery adjustment described in WAC 480-109-130; the portfolio- and program-level cost-effectiveness of the actual electricity savings from conservation, all program evaluations completed in the preceding year, a discussion of the steps taken to adaptively manage conservation programs throughout the preceding year. Avista must submit to the department a conservation report as described in WAC 194-37-060, and file a copy of that report with the commission in the same docket as its current biennial conservation plan.
78	Biennial Conservation Plan (BCP)	Washington Utilities and Transportation Commission	Electric	Demand Side Management, Rates and Tariffs	Biennial (odd years)	The BCP must include, but is not limited to: A request that the commission approve its ten-year conservation potential and biennial conservation target; the extent of public participation in the development of the ten-year conservation potential and the biennial conservation target; the ten-year conservation potential, the biennial conservation target, biennial program details, biennial program budgets, and cost-effectiveness calculations; a description of the technologies, data collection, processes, procedures and assumptions Avista used to develop the figures; a description of and support for any changes from the assumptions or methodologies used in the Company's most recent conservation potential assessment; an evaluation, measurement, and verification plan for the biennium including, but not limited to: (a) the evaluation, measurement, and verification framework; (b) the evaluation, measurement, and verification budget; and (c) identification of programs that will be evaluated during the biennium.
79	Biennial Conservation Report (BCR)	Washington Utilities and Transportation Commission (WUTC)	Electric and Natural Gas	Demand Side Management, Rates and Tariffs	Biennial (even years)	Avista is required to file a biennial conservation report regarding its progress in meeting its conservation target during the preceding two years, with the WUTC, in the same docket as its current biennial conservation plan. The biennial conservation report must include: The biennial conservation target; planned and claimed electricity savings from conservation; budgeted and actual expenditures made to acquire conservation; the portfolio-level cost-effectiveness of the actual electricity savings from conservation; an independent third-party evaluation of portfolio-level biennial conservation savings achievement; a summary of the steps taken to adaptively manage conservation programs throughout the preceding two years; and any other information needed to justify the conservation savings achievement. Avista must provide a summary of the biennial conservation report to its customers by bill insert or other suitable method within ninety days of the commission's final action on the report.
80	Low Income Rate Assistance Program (LIRAP) Annual Report	Washington Utilities and Transportation Commission, Oregon Public Utility Commission	Electric and Natural Gas	Customer Solutions, Rates and Tariffs	Annual	Low Income Rate Assistance Program funds, collected from all of Avista's Washington and Oregon residential customers, are used for bill payment assistance that supports the Company's qualified, low-income, residential customers. The annual report indicates the status of the program based on the prior heating season.

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	Compliance Requirement	Jurisdiction	Fuel	Department	Reporting Frequency	Compliance Requirement Description
81	Protection of Electronic Data and Information	Sarbanes-Oxley Act (SOX) Health Insurance Portability and Accountability Act (HIPPA) Federal Energy Regulatory Commission (FERC) North American Electric Reliability Corporation (NERC) State Commissions / Laws	Electric and Natural Gas	Application Support	Per Event, Annual	Federal and State requirements regarding the access and protection of electronic data - SOX, HIPPA, FERC, NERC, State Identity Theft Rules, and Federal Data Privacy requirements. Includes design, operations, inspections, and ongoing record keeping requirements.
82	Customer Information and Confidentiality	Washington Utilities and Transportation Commission, Idaho Public Utilities Commission and Oregon Public Utility Commission	Electric and Natural Gas	Customer Solutions, Rates and Tariffs	Annual	Per Commission rules, Avista must provide its retail electric customers an explanation of the utility's policies governing the confidentiality of proprietary customer information, including the circumstances under which the information may be disclosed and ways in which customers can control access to the information. The Customer Information Privacy Policy includes the Customer Disclosure Statement required by the WUTC. The Company's employees must comply with Customer Information Privacy Policy and Avista's Code of Conduct and Ethics Policy regarding confidentiality and appropriate use of business information and records.
83	Service Quality Measures and Guarantees	Washington Utilities and Transportation Commission	Electric and Natural Gas	Customer Service	Annual	Service Quality Measures apply to Washington customers only. There are three categories: 1) Customer Service (six measures); 2) Electric System Reliability (2 measures); 3) Customer Service Guarantees (7 measures). Performance monitoring began July 2015, service guarantees effective January 1, 2016.
84	Telecommunication and Radio Communication Sites	Federal Communications Commission, Federal Aviation Administration, Occupational Safety and Health Administration	Electric and Natural Gas	Infrastructure Technology	Per Event, Annual	Federal and State requirements regarding the application, permitting, licensing, design, construction, operations, inspections and ongoing requirements related to communication sites, including towers and other mounted equipment. Includes requirements related to employee safety.
85	Protection of Facilities containing Computer, Network and Data Communication Equipment	Sarbanes-Oxley Act (SOX), Health Insurance Portability and Accountability Act (HIPPA), Federal Energy Regulatory Commission (FERC), North American Electric Reliability Corporation (NERC,) State Commissions, State Laws	Electric and Natural Gas	Infrastructure Technology	Per Event Annual	Federal and State requirements regarding the protection of computer, network, and data communication equipment - SOX, HIPPA, FERC, NERC, State Identity Theft Rules, and Federal Data Privacy requirements. Includes design, operations, inspections, and ongoing record keeping requirements.