



Avista Corp.

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May 25, 2018

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

Re: Docket No. UG-170003 – Comments of Avista Utilities

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or Company), submits the following comments in accordance with Commission Staff's request for comments in UG-170003 on April 24, 2018 regarding Staff's proposed topic areas and rulemaking proposal related to natural gas cost of service studies. Pursuant to the Request, Avista submits the following comments to the questions posed in the Request:

Avista does not object to any of the specific topic areas as outlined by Commission Staff in this docket. The Company believes the topic area list to be comprehensive and does not, at this time, offer any new topics for consideration. The Company is supportive of continuing down a rulemaking process track as proposed by Staff to address formatting and procedural topics. Furthermore, the Company supports Staff's proposal to address specific methodology changes through a policy statement. The Company looks forward to further exploring and understanding each of the topic areas to find solutions that would provide commonality between all utilities future cost of service studies.

Avista appreciates the opportunity to provide these comments and we look forward to participating in the future natural gas cost of service discussions. Please direct any questions regarding these comments to myself at 509-495-4546 or Tara Knox at 509-495-4325.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Miller", with a stylized flourish at the end.

Joe Miller
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Regulatory Affairs
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509-495-4546
Avista Utilities