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August 23, 2019

VIA UTC WEB PORTAL

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

Re: Avista Corp.
Petition for Modification of Avista's Senior and Disabled Rate Discount Program,
Dockets UE-190646 and UG-190648

Dear Mr. King:

On August 1, 2019, Avista filed a petition to change rate assistance offerings for qualifying customers. Public Counsel appreciates the opportunity to express support for this filing. The Company is seeking approval to make rate discounts a permanent offering for income-qualifying senior customers and customers living with a disability. This filing is the culmination of years of work, a successful pilot program, and collaboration with a wide variety of stakeholders, including Commission Staff, The Energy Project, and representatives from community action agencies ("agencies") in Avista's service territory. Public Counsel supported the efforts and is grateful for the Company's willingness to work with the stakeholder group and try innovative ways to better serve vulnerable populations.

If the Commission approves this petition, customers earning between 151 percent and 200 percent of the federal poverty line will receive a per-kWh or per-therm discount on their bill. This program is different from grants that are offered through Avista's Low-Income Rate Assistance Program (LIRAP) and the federal Low-Income Heating Assistance Program (LIHEAP). The evaluation of the pilot produced positive results, which informed the advisory group's recommendation to make the program permanent. Most customers who participated in the pilot were happy with program and would remain enrolled if given the option. Furthermore, the evaluation determined that a rate discount accomplishes the four low-income program goals outlined in the Commission's Order in Dockets UE-140188 and UG-140189.¹

¹ Order 05 indicated that low-income rate assistance programs should: 1) keep customers connected to service, 2) provide assistance to more customers than currently being served, 3) lower customers' energy burden, and 4) ensure that appropriate data is available to evaluate effectiveness.

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Public Counsel recognizes the considerations and resources provided to the agencies to ensure a successful program roll out. The petition gradually eliminates grants offered to income-qualifying seniors and customers living with disabilities. Grants will be phased out over two years, and customers who prefer receiving grants may stay enrolled until the end of the two-year period. Agencies will also receive funding to cover the administrative tasks and customer education necessary to implement the rate discount program.

Public Counsel looks forward to continued collaboration with Avista and other stakeholders. Any questions may be directed to Corey Dahl, at (206) 464-6380 or CoreyD@atg.wa.gov.

Sincerely,

/s/ Corey J. Dahl

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CJD/KMB