



**U-230161**

**Avista Corp.**

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Ms. Kathy Hunter  
Acting Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

**RE: Docket U-230161 - Avista's Comments Regarding the Commission's Rulemaking Regarding Investor-Owned Utility Obligations Under the Climate Commitment Act**

Dear Ms. Hunter:

Avista Corporation, dba Avista Utilities (Avista or the Company), submits the following comments in accordance with the Washington Utilities and Transportation Commission's (WUTC or the Commission) Notice of Opportunity to File Written Comments (Notice) issued in Docket U-230161 on September 13, 2023, amended on October 10, 2023, regarding the Commission's rulemaking to update WAC 480-100 regarding investor-owned utility obligations under the Climate Commitment Act (CCA).

By way of the Notice, the Commission is considering the need for revisions to WACs 480-100-620, 480-100-640, 480-100-650, 480-90-238, and 480-107. As referenced in the Notice, the Department of Ecology (Ecology) is the primary rulemaking agency for purposes of implementing the CCA. As such, it is not necessary for the Commission to consider revisions to the referenced WACs at this time. In particular, revisions to WAC 480-100 are not necessary to accommodate the need for electric utilities to propose supply and demand forecasts for Commission approval, that are then provided to Ecology. Regarding, the consideration of modification to WAC 480-90-238, it is not necessary as gas utilities must incorporate the impacts of the CCA within their Integrated Resource Plan, as complying with the CCA is required by law.

Throughout the U-230161 workshop series, a number of topics and questions were raised by which interested parties sought guidance from the Commission. At this stage, that guidance is still necessary, but Avista's suggestion is that the Commission provide this guidance via a policy statement as planned, rather than extending this process to consider the revision and/or adoption of new administrative rules.

If you have any questions regarding these comments, please contact me at 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

/s/ *Shawn Bonfield*

Shawn Bonfield  
Sr. Manager of Regulatory Policy & Strategy