



**Avista Corp.**

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September 11, 2020

Mark L. Johnson  
Executive Director and Secretary  
Washington Utilities & Transportation Commission  
621 Woodland Square Loop SE  
Lacey, WA 98503

Re: Docket No. UE-190652 – Comments of Avista Utilities

Dear Mr. Johnson,

Avista Corporation, dba Avista Utilities (Avista or Company), submits the following comments in accordance with the Washington Utilities and Transportation Commission’s (“Commission”) Notice of Opportunity to File Written Comments on Proposed Rules (“Notice”) issued in Docket UE-190652 on September 1, 2020 regarding the Commission’s “Rulemaking to amend the Energy Independence Act (EIA), WAC 480-109.”

Avista appreciates the opportunity to collaborate with Commission Staff and stakeholders throughout the rulemaking process to amend the Energy Independence Act, and specifically the change addressed in the Notice regarding the acquisition of renewable energy credits. The Company supports the deletion of WAC 480-109-200(2)(a) as it addresses the concern raised during the rule adoption hearing held on July 28, 2020.

Please direct any questions regarding these comments to me at 509-495-2782 or [shawn.bonfield@avistacorp.com](mailto:shawn.bonfield@avistacorp.com).

Sincerely,

/s/ *Shawn Bonfield*

Senior Manager, Regulatory Policy & Strategy  
Avista Utilities

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