

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of	)	DOCKET NO. UE-100176
AVISTA Corporation's	)	
Ten-Year Achievable Conservation	)	PETITION OF AVISTA CORPORATION
Potential and Biennial Conservation	)	TO AMEND ORDER 01
Target Under RCW 19.285.040 and	)	
WAC 480-109-010	)	
_____	)	

**I. PETITIONER**

1           In accordance with WAC 480-07-395, the name and address of Petitioner, Avista Corporation (“Avista,” or “Company”), is as shown below. Please direct all correspondence related to this Petition as follows:

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**II. INTRODUCTION**

2           Pursuant to RCW 80.04.210 and WAC 480-07-875, Avista hereby requests that the Commission issue an order to amend Order No. 01 in Docket UE-100176 to change the timing of one of the reports required by Paragraph 64.

3 RCW Chapter 19.285, Energy Independence Act, also known as Initiative Measure No.  
937 or I-937, mandates, among other requirements, that utility companies obtain fifteen  
percent of their electricity from new renewable resources such as solar or wind by 2020 and to  
undertake all cost-effective energy conservation. The Commission adopted Chapter WAC  
480-109, *Acquisition of Minimum Quantities of Conservation and Renewable Energy*, to  
effectuate RCW Chapter 19.285.

4 Avista Corporation's Ten-Year Achievable Conservation Potential and Biennial  
Conservation Target for 2010-2012 was approved, with conditions, pursuant to RCW  
19.285.040(1)(e) and WAC 480-109-010(4)(c) in Order No. 01 in Docket UE-100176 on May  
13, 2010.

5 The conditions provide in Order No. 01, at *para 64*, "Required Reports and Filings"  
(8)(g), providing that the Company must file its 2011 Annual Report on Conservation  
Acquisition, including an evaluation of cost effectiveness, by March 31, 2012.

### III. REQUESTED AMENDMENT

6 Avista requests the Commission remove the condition in Order No. 01, Docket No. UE-  
100176, that requires the Company to file a March 31<sup>st</sup>, 2012, report on its conservation  
acquisition. If filed on this date, the report would include "unverified" conservation  
acquisition savings, because the independent third party verification would not have occurred  
by then. The Company requests that it, instead, be allowed to file a "verified savings" report  
and evaluation of cost-effectiveness (with testimony and associated support) on or before June  
1<sup>st</sup>, 2012 for the 2010 and 2011 time period (both separated by year and together as the two-  
year biennium). Presentation of "verified savings" (by an independent third party) will assist

all parties in their review of the documentation and increase accuracy and administrative efficiency. This report will be based upon a third-party assessment (performed by The Cadmus Group) based upon the Company's "Evaluation, Measurement and Verification (EM&V) Framework" (filed on September 1<sup>st</sup>, 2010 in Docket Nos. UE-090134, UG-090135 and UG-060518 (consolidated)) and associated EM&V plans. This June 1, 2012 date would also be consistent with Avista's obligation to file testimony and supporting evidence on June 1, 2012 in separate dockets to demonstrate the prudence of its electric and natural gas DSM expenditures for the prior two years, as per Order No. 05 in Docket Nos. UE-110876 and UG-110877 (consolidated).

7 Specifically, Avista requests that Paragraph 64 (Ordering Paragraph (8)) be amended as follows:

**(8) Required Reports and Filings**

Avista must file the following:

- ~~(g)~~ ~~2011 Annual report on Conservation Acquisition, including an evaluation of cost effectiveness, by March 31, 2012.~~
- ~~(h)~~(g) Two-year report on conservation program achievement by June 1, 2012, including verified savings and an evaluation of cost effectiveness. This filing is the one required in WAC 480-109-040(1) and RCW 19.285.070, which require that the report also be filed with the Washington Department of Commerce.

#### IV. CONCLUSION

8 The Company believes that the requirement for the filing of an "unverified savings" report on March 31<sup>st</sup>, 2012 should be replaced with a requirement that a "verified savings" report and evaluation of cost-effectiveness be filed on June 1, 2012 instead. Presentation of "verified" savings (by an independent third party) will assist all parties in their review of the

documentation and increase accuracy and administrative efficiency. Accordingly, the Company requests an amendment to Order No. 01 allowing a “verified savings” report and evaluation of cost-effectiveness (with testimony and associated support) be filed on or before June 1<sup>st</sup>, 2012 for the 2010 and 2011 time period (both separated by year and together as the two-year biennium). Based on discussions with Avista’s Advisory Group, the Company understands that no party is opposed to this request.

DATED this 1<sup>st</sup> day of February 2012

By:   
David J. Meyer  
Vice President and Chief Counsel, Avista Corp.



