



Avista Corp.

1411 East Mission P.O. Box 3727
Spokane, Washington 99220-0500
Telephone 509-489-0500
Toll Free 800-727-9170

September 26, 2019

Via Electronic Mail

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

Re: Docket No. UE-170002 and UG-170003 - Comments of Avista Utilities on Rulemaking to Address Electric and Natural Gas Cost of Service

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 Workshop (Notice) dated August 30, 2019 and Notice of Opportunity to Respond to Small Business Economic Impact Statement (SBEIS) Questionnaire (Notice) also dated August 30, 2019. Avista appreciates the opportunity to provide comments.

In general, the Company has no major issues with the informal draft rules and looks forward to collaboratively participating with the parties to finalize the rule making process. Avista has reviewed the informal draft rules provided with this Notice and believes minor clarifying issues can be addressed as part of the workshop discussions.

Regarding the SBEIS Notice, Avista does not anticipate the WAC 480-XX-010 through WAC 480-XX-070 informal draft proposed rules to have any significant cost impact that would affect the Company's revenue requirement from small businesses. Avista currently employs over 1700 employees.

Please direct any questions regarding these comments to Tara Knox at 509-495-4325 or tara.knox@avistacorp.com or Joe Miller at 509-495-4546 or joe.miller@avistacorp.com.

Sincerely,

/s/ Patrick Ehrbar

Patrick Ehrbar
Director of Regulatory Affairs

Received
Records Management
09/26/19 11:55
State Of WASH.
UTIL. AND TRANSP.
COMMISSION