



Avista Corp.

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July 17, 2018

VIA – Commission Web-Portal

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

Re: UE-180418 – Revised Tariff

Dear Mr. Johnson,

Attached for filing with the Commission is an electronic copy of Avista Corporation’s dba Avista Utilities (“Avista” or “the Company”) “revisions” to the proposed modifications to its Tariff Schedule 80 “Meter Reading and Billing Practices” filed on May 14, 2018. The proposed additions are included in the following tariff sheets, WN U-29:

Substitute Original Sheet 180a
Original Sheet 180b
Original Sheet 180c

Canceling Original Sheet 180a

The purpose of the proposed “revisions” is to reflect input from the Commission Staff, and other interested Parties. Avista appreciates the input and guidance provided and has incorporated the following changes in the Company’s proposed tariff.

Under the proposed tariff filed on May 14, 2018, the Company proposed only customers in single-family residential homes qualified, the proposed revisions now include multi-plexes up to four units. Also the Company originally proposed limited terms and conditions in its tariff,

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which had been addressed more in its advice letter, the Company believes that having defined the terms and conditions in the tariff provides clearer detail.

Under the proposed tariff filed on May 14, 2018, the Company proposed to manually read each customer's non-communicating digital meter on an every-other-month basis¹, and estimate² the customer's bill in the intervening month. Further, the Company proposed to arbitrarily reduce the monthly fee to be paid by the customer for each manual read by an amount of \$8.00, or roughly 16%. When this lower monthly cost (\$40.00) is spread across two months, the resulting leveled per-month cost was \$20.00 each month.

After consultation with Commission Staff and other Parties, the Company proposes to manually read each customer's non-communicating digital meter once per quarter, and will estimate the customer's bill in the intervening month.³ Further, the Company proposes to reduce the originally proposed monthly fee to be paid by the customer to \$5.00 per month.

As provided above, Customers that choose a non-communicating digital meter will have their meter(s) read by the Company on a quarterly basis. The non-manual meter read billing cycles will be estimated by the Company. The monthly charge for this service is as set forth below:

Natural Gas Meter(s) Read Only	Both Electric and Natural Gas Meter(s) Read
\$5.00	\$5.00

With States and municipalities having adopted varying policies surrounding customer choice for advanced meter installations, some through legislative mandates and others by commission determination, customer choice options for advanced meter installations in new to Avista and to Washington State policy as well. For this reason, the Company believes, as well as the Commission Staff and interested Parties, it is appropriate for the proposed Customer Choice for a Non-Standard Digital Meter become a pilot. The Company proposes a pilot period ending two years following the installation of the first AMI meter, anticipated to occur in September 2018. At that point in time (anticipated to be September 2020), Avista will file a comprehensive report

¹ This proposed approach would not require the Company to file a petition for exemption from WAC 480-07-110.

² Consistent with WAC 480-100-178 (1)(ii), and WAC 480-90-178 (1)(ii).

³ Consistent with WAC 480-100-178 (1)(ii), and WAC 480-90-178 (1)(ii).

with the Commission on the status of its realized costs associated with the administration of manually reading a non-communicating digital meter, any problems experienced by Avista or our customers associated with the pilot, and any recommendations for changes to be proposed in the form of a permanent tariff.

Avista will continue its practice of responding directly to every customer who raises a concern with advanced metering. We have found this direct approach of providing accurate, understandable, and balanced information to be very helpful and effective to our customers. Once a customer contacts us we will direct them to the Company's website, or mail them the attached Application Form, they can then return the signed form to Avista in order to process the meter request.

Again, Avista appreciates the good work done by Commission Staff, Public Counsel and the Energy Project on this matter. Avista requests the tariff conditions proposed herein become effective August 2, 2018.

Please direct any questions regarding this filing to me at 509-495-4975.

Sincerely,

/s/Linda Gervais

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Avista Utilities