BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION,

Respondent.

DOCKETS UE-220053 and UG-220054 (Consolidated)

NW ENERGY COALITION'S REQUEST FOR PAYMENT OF AVISTA CUSTOMER REPRESENTATION SUB-FUND GRANT

- 1. Pursuant to Article 7.1 of the Washington Interim Participatory Funding Agreement ("Funding Agreement") approved by the Washington Utilities and Transportation Commission ("Commission") in Order 01 in Docket U-210595, the NW Energy Coalition ("NWEC") hereby requests final payment of NWEC's Avista Customer Representation Sub-Fund Grant in the amount of \$29,340.
- 2. On January 21, 2022, Avista Corporation d/b/a Avista Utilities ("Avista") filed its request for a general rate revision for both its gas and electric service. The Commission docketed these filings as UE-220053 and UG-220054 ("Proceeding").
- 3. On March 8, 2022, as required by Article 6.2 of the Funding Agreement, NWEC filed its Request for Case Certification and Notice of Intent to Request a Fund Grant, which was also served on Avista and all parties of record in the Proceeding. In that filing, NWEC identified the Avista Customer Representation Sub-Fund as the account from which NWEC intended to request a Fund Grant.
- 4. On March 24, 2022, the Commission granted NWEC's Request for Case Certification, finding that NWEC demonstrated it is a non-profit organization that represents broad customer

interests, ¹ that "it can effectively represent the particular customers it seeks to represent," ² and that "the public interest is served by NWEC's participation." ³

5. On April 22, 2022, NWEC filed its Proposed Budget in this Proceeding, showing requested expenses of \$50,000 and seeking an Avista Customer Representation Sub-Fund Grant in the amount of \$50,000. The amount requested included estimates for contracted services at discounted rates and did not represent the full market value of these services. Additionally, the requested amount of \$50,000 did not include an estimate for the full cost for NWEC to participate in the Proceeding. The Commission issued Order 06 in the Proceeding on May 27, 2022, approving an Avista Customer Representation Sub-Fund Grant for NWEC in the amount of \$50,000.⁴

6. At this time, NWEC requests that the Commission authorize final payment of NWEC's approved Sub-Fund Grant in Dockets UE-220053 and UG-220054 in the amount of \$29,340 from the 2022 Avista Customer Representation Sub-Fund. Pursuant to Article 7.1 of the Funding Agreement, a "Request for Payment for Customer Access Funds may be made at the conclusion of an Eligible Proceeding." As detailed in Confidential Exhibit A, attached hereto, NWEC has incurred Eligible Expenses below its approved budget in this Proceeding.

7. This Request for Payment satisfies the requirements of the Funding Agreement as follows:

Order 05 at № 28 (Mar. 24, 2022).

² Order 05 at ₱ 29.

³ Order 05 at ₱ 29.

Order 06 at № 15-18 (May 27, 2022).

- Article 7.1(a) The itemized expenses, payees, and hourly rates, including billing details and separately identified amounts for consultant or expert witness fees and travel expenses.

 This is attached as Confidential Exhibit A.
- Article 7.1(b) Demonstration that the expenses are reasonable and directly attributable to issues and position pursued on behalf of customers consistent with intervenor's proposed budget. NWEC has been an active participant in this Proceeding. NWEC reviewed the filings in this Proceeding, conducted discovery, participated in settlement discussions and the evidentiary hearing, and filed a brief. NWEC raised several issues throughout the Proceeding such as Colstrip costs, natural gas line extensions, transportation electrification, Climate Commitment Act, performance metrics, and rate design.⁵ The expenses included in Confidential Exhibit A are reasonable and directly attributable to NWEC's participation in Dockets UE-220053 and UG-220054.
- Article 7.1(c) Provide information sufficient to show that Participating Organization has complied with any condition or requirement of the Fund Grant. As set forth in this Request for Payment and Confidential Exhibit A, NWEC has provided information sufficient to demonstrate that NWEC has complied with all conditions and requirements of its approved Sub-Fund Grant.
- Article 7.1(d) Specify whether the request for payment is for interim funding or final payment in full and indicate whether any approved budget amount may be released back to the applicable Sub-Fund. This Request for Payment constitutes a Request for Final Payment for \$29,340 of NWEC's approved budget in this Proceeding.

⁵ See generally NWEC's Post-Hearing Brief (Oct. 21, 2022).

8. Accordingly, NWEC has satisfied the terms of the Funding Agreement and respectfully requests that the Commission approve NWEC's Request for Final Payment in the amount of \$29,340 from the 2022 Avista Customer Representation Sub-Fund within 30 days of receiving this Request for Final Payment, as provided in Article 7.6 of the Funding Agreement.

Checks should be made payable to:

NW Energy Coalition

Payment should be sent to:

NW Energy Coalition c/o Kat Plimpton 811 1st Ave. NE Seattle, WA 98104.

Dated this 10th day of February 2023.

Respectfully submitted,

/s/ Irion Sanger
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Of Attorneys for the NW Energy Coalition