

**BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION**

WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION,

Complainant,

v.

AVISTA CORPORATION d/b/a  
AVISTA UTILITIES,

Respondent.

DOCKETS UE-220053 and  
UG-220054 (*Consolidated*)

**REQUEST FOR PAYMENT**

**Redacted Version**

1. Small Business Utility Advocates (SBUA) hereby submits its Request for Payment in the amount of twenty thousand (\$20,000) dollars.
2. This request is made pursuant to the Washington Interim Participatory Funding Agreement (Interim Agreement) and the Commission’s Order No. 08/02, issued on July 11, 2022 (Order). This Order grants SBUA eligibility for an award of \$20,000 from Avista’s Customer Representation Sub-Fund and authorizes SBUA to use the funds only for attorney fees and expert witness fees.

BACKGROUND

3. On January 21, 2022, Avista Corporation (Avista) filed its above-referenced requests for general rate revisions, respectively, for Avista’s gas and electric service.
4. On March 9, 2022, SBUA timely submitted its Request for Case Certification and Notice of Intent to Request a Fund Grant.
5. On March 9, 2022, SBUA also executed and submitted in this proceeding a Signature

Addendum to the Interim Agreement.

6. On March 16, 2022, the Commission issued Bench Request No. 1 and No. 2, requesting additional information from intervenors and SBUA regarding their Requests for Certification filed with the Commission.
7. On March 18, 2022, SBUA submitted a response to Bench Request No. 2.
8. On March 24, 2022, the Commission issued Order No. 5, granting SBUA's Request for Certification and directing SBUA to provide additional information to support its intervention.<sup>1</sup>
9. On April 25, 2022, SBUA submitted additional information and its Proposed Budget seeking \$50,000 in intervenor funding.<sup>2</sup>
10. On May 27, 2022, the Commission issued Order No. 6, which approved the budgets for certain intervenors, but denied SBUA's budget request.<sup>3</sup>
11. On June 6, 2022, SBUA filed a Petition for Review of Order No. 6 (Petition) with additional detail on SBUA's intervention and interest in advocating for small businesses in Avista's Washington territory.
12. On July 11, 2022, the Commission issued its Order in response to SBUA's Petition, approving SBUA's budget but with a cap at \$20,000.<sup>4</sup>

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<sup>1</sup> Order 05, Granting Requests for Case Certification (Mar. 24, 2022) at ¶ 34.

<sup>2</sup> SBUA's Proposed Budget, Exh. A.

<sup>3</sup> Order No. 6.

<sup>4</sup> Order No. 08/02.

## COMPLIANCE WITH INTERIM AGREEMENT

13. SBUA is a nonprofit 501(c)(3) organization that intervened in this proceeding to represent, protect, and promote the interests of small businesses ratepayers. SBUA's participation in this proceeding included, among other things, analyzing the revenue requirement, Rate of Return, rate spread, rate design provisions, energy efficiency provisions, affordability metrics, and distributed energy resources (DER) programs, all from the perspective of the interests of small business ratepayers, attending prehearings / status conferences, drafting and reviewing discovery, engaging with Avista and other groups in settlement negotiations, sponsoring joint testimony, filing joint post-hearing briefs, and joining as a party to the multi-party settlement stipulation.

14. SBUA has complied with Section 7.1 (Customer Access Fund Request for Payment) of the Interim Agreement, as follows:

- (a) SBUA has attached confidential Exhibit A with "itemize[d] the expenses, payees and hourly rates for amounts to be reimbursed, including billing details, and including separately identified amounts for consultant or expert witness fees and travel expenses."
- (b) SBUA's Executive Officer has certified that these expenses are reasonable and are directly attributable to issues and positions pursued on behalf of small business customers and consistent with SBUA's proposed budget and the Commission's approval of a partial budget for SBUA in Order 08/02.
- (c) SBUA has complied with the conditions and requirements of the Fund Grant and is including attached confidential Exhibit B, which lists SBUA's members in Avista's territory and the State of Washington, and in compliance with Order 08/02.
- (d) SBUA's Executive Director has specified that this request for payment is a final payment in full. *See* confidential Exhibit A.

Interim Agreement, Section 7.1, subd. (a)-(d).

15. Please send any payments to: Small Business Utility Advocates, 548 Market St., #11200, San Francisco, CA 94104.

16. For the foregoing reasons, SBUA has satisfied the terms of the Interim Agreement and Order 08/02 and respectfully requests that the Commission approve a \$20,000 payment to SBUA from the Avista Customer Representation Fund.

Dated this 17<sup>h</sup> day of February, 2023.

Respectfully submitted,

/s/ Jennifer Weberski

Jennifer Weberski

**Small Business Utility Advocates**

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**Exhibit A**

(Redacted per WAC 480-07-160 – Document is redacted in its entirety)

Confidential Exhibit A to SBUA’s Request for Payment of Fund Grant has been designated confidential pursuant to 42.56, RCW, and has been redacted in its entirety. SBUA will provide confidential Exhibit A to the Commission and Avista in accordance with Article 7.1 of the Washington Interim Participatory Funding Agreement. SBUA requests that confidential Exhibit A be protected from public disclosure to the maximum extent possible under the Washington Public Records Act, Chapter 42.56, RCW.

**Exhibit B**

(Redacted per WAC 480-07-160 – Document is redacted in its entirety)

Confidential Exhibit B to SBUA’s Request for Payment of Fund Grant has been designated confidential pursuant to 42.56, RCW and federal laws (*see, e.g., NAACP v. Patterson*, 357 U.S. 449 (1958) (upholding confidentiality of nonprofit membership lists), and has been redacted in its entirety. SBUA will provide confidential Exhibit B to the Commission in compliance with Order 08/02. SBUA requests that confidential Exhibit B be protected from public disclosure to the maximum extent possible under federal law and the Washington Public Records Act, Chapter 42.56, RCW.