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Mar 27, 2023

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March 27, 2023

**Via UTC Web Portal**

Amanda Maxwell  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
621 Woodland Sq. Loop SE  
P.O. Box 47250  
Lacey, Washington 98503

Re: UE-220053 et al; TEP Comments on Avista Multi-Year Rate Plan Metrics

Dear Director Maxwell:

On December 12, 2022, the Washington Utilities and Transportation Commission approved through Final Order 10/04 a full multi-party settlement in the Avista General Rate Case.<sup>1</sup> As part of the settlement, the settling parties agreed to 92 performance metrics to measure the utility's performance across a range of policy goals over the course of the multi-year rate plan. The Commission ordered Avista to file its performance metrics and required the Settling Parties to review and provide feedback on the Company's filing.<sup>2</sup> On February 23, 2023, Avista submitted a filing that included the measures required by the Commission in Table 8 of the Final Order.

The Energy Project (TEP) has reviewed the filing and recommends that Avista work with parties to identify and refine metric calculations, and that the Commission consider modifying the cadence of filings to avoid the need for future amendments or supplements.

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<sup>1</sup> Dkt. UE-220053, UG-220054, UE-210854 (Consolidated), Final Order 10/04 Rejecting Tariff Sheets; Granting Petition; Approving and Adopting Full Multiparty Settlement Stipulation Subject to Conditions; Authorizing and Requiring Compliance Filing (Dec. 12, 2022).

<sup>2</sup> *Id.* at ¶ 99.

**I. Avista should work with parties to identify and refine metric calculations.**

The Settlement Stipulation did not identify the calculation for each metric. With only a few exceptions, Avista did not identify the calculation it used to measure the Company's performance. The calculations of the measures should be transparent, with the feedback of parties considered as they are established. TEP requests that in 2023 Avista work with the parties to discuss the appropriate calculation for each metric, refine the calculations as suggested by parties, and include the agreed upon calculations in a subsequent filing.

**II. Avista's metrics provide useful data about affordability and energy burden.**

TEP's primary focus through its engagement in this proceeding and the Commission's generic proceeding on performance-based regulation is on affordability, energy burden, and equity performance metrics. To that end, our review of the Company's filing was focused on the Company's affordability and energy burden data. We conclude in our initial review that the affordability and energy burden data reported aligned with the reporting requirements outlined by the Commission. The Company presented the information in a clear and transparent manner. TEP commends Avista for both the metrics identified in the Settlement Stipulation and the Final Order in a clear and effective manner.

**III. The Commission should consider modifying the cadence of filings to avoid the need for amendments or supplements.**

Like Puget Sound Energy, Avista did not provide measures and calculations for several metrics, primarily operational and earnings metrics, due to data for the calendar year 2022 not being available. The Company's letter states that 2022 data will only become available after the Company's Q1 earnings call or until the Company files its FERC Form 1 at the end of April. We appreciate that the Commission required the Company to make an immediate compliance filing shortly after the general rate case and subsequent annual filings. However, both Avista's and PSE's filing state that, based on the cadence of filings, each year some of the required information will not be available within the timeline required by the Commission. We encourage the Commission to consider if it is necessary to amend the timing of the filings, so the utilities do not have to make supplemental filings each year.

#### **IV. Conclusion**

TEP looks forward to participating further in this proceeding and continuing to work with the Commission, the Company, and the intervening parties in the evaluation of Avista's performance during this multiyear rate plan. Reporting on the Company's performance, as measured by these metrics, will be valuable to the Commission, Company, and parties interested in measuring the utility's performance over the course of a multi-year rate plan, and for targeting utility actions and engagements to ensure all customers are benefitting from the transition to clean energy, as required by the Clean Energy Transformation Act.

TEP thanks the Commission for the opportunity to submit these comments. If you have any questions about these suggestions, please contact Brad Cebulko at [bcebulko@strategen.com](mailto:bcebulko@strategen.com) or (510) 296-8481.

Very truly yours,

*/s/Yochanan Zakai*  
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