



March 27, 2023

SENT VIA UTC WEB PORTAL AND EMAIL

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

**Re: Washington Utilities and Transportation Commission v. Avista Corporation
In the Matter of the Electric Service Reliability Reporting Plan of Avista
Corporation
Docket Nos. UE-220053, UG-220054, and UE-210854 (Consolidated)**

Dear Executive Director and Secretary Amanda Maxwell:

Pursuant to the Washington Utilities and Transportation Commission's Final Order 10/04 in the above-captioned docket, Sierra Club offers the following feedback on Avista's first performance metrics compliance filings, which were submitted to the docket on February 10, 2023 and February 23, 2023.

Avista's compliance filings contain information that can help Avista, stakeholders, and the Commission evaluate Avista's progress toward a number of state policy goals, and identify new opportunities to advance those goals. In particular, the reported information on emissions of greenhouse gases and other pollutants will help evaluate Avista's compliance with the Climate Commitment Act and the Clean Energy Transition Act, as well as identify new opportunities and compliance pathways. This information will become even more valuable in future compliance filings, when data such as emissions avoided through non-pipe alternatives and the ratio of new gas customers to new electric customers becomes available. Additionally, the reported information on affordability, disconnections, arrearages, and energy burdens may be a useful supplement to other available data as the Commission considers changes to its rules on customer

notice, credit, and collections, including disconnections and related fees, in Docket U-210800 and other contexts.

Sierra Club does not have any further feedback or questions about Avista's performance metrics at this time. Sierra Club will continue to review existing and future performance metric compliance filings to identify ways that this information can help advance state policy goals through performance-based regulation, especially goals related to equitable decarbonization.

Sincerely,

/s/ Jim Dennison

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cc: Service List (via Email)