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March 30, 2023

Amanda Maxwell, Executive Director and Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Re: *WUTC v. Avista Corp. d/b/a Avista Utilities*
Dockets UE-220053, UG-220054, UE-210854 (*Consolidated*)

Dear Ms. Maxwell:

Staff appreciates the opportunity to offer comments on Avista's metrics as required by the final Order 10/04 in the Company's general rate case.^{1,2} In general, Staff believes Avista's metrics to be an important first step and model for all companies and the Commission as the Clean Energy Transformation Act (CETA)³ and Engrossed Substitute Senate Bill 5295 (the Multi-Year Rate Plan (MYRP) law)⁴ move the state toward more equitable and publicly transparent energy regulation. In particular, in addition to filing metrics and data in the docket, the Company's website has begun to display both raw data and maps showing that data. The Company's reporting work on a short timeline is substantial and Staff commends it.

A Clarification on Different Types and Timing of Reporting

Staff clarifies the following regarding the multiple sets of metrics Avista was required to submit, and which the Company reported on various timelines. Avista uses the terms 'MYRP metrics,' as required by the Commission and spelled out in Table 8 of Final Order 10/04,⁵ and 'performance-based ratemaking (PBR) metrics,' as created in the settlement stipulation.⁶

Avista filed the first round of MYRP metrics on January 24, 2023, within 45 days of December 12, as required by Final Order 10/04. Other MYRP metrics were not available until after a company earnings call on February 22, 2023, and as such were filed on February 23. The Company has indicated that a final set of 2022 MYRP metrics will be filed on or around May 1.

¹ *Wash. Utils. & Transp. Comm'n v. Avista Corp.*, Dockets UE-220053, UG-220054, & UE-210854, Order 10/4, 36 ¶ 99 (Dec. 12, 2022) ("Order 10").

² The Commission required parties to submit comments within 45 days of Avista filing its performance report. Staff apologizes for the belated submission of these comments, which were due to an error on Staff's part.

³ See generally chapter 19.405 RCW.

⁴ RCW 80.28.425.

⁵ Order 10 at 70 ¶ 191.

⁶ *Wash. Utils. & Transp. Comm'n v. Avista Corp.*, Dockets UE-220053, UG-220054, & UE-210854, Full Multiparty Settlement Stipulation, Attachment B at 1-6 (June 28, 2022).

The Company made its first PBR metrics filing on February 10, 2023, using 2022 data. The first quarter of 2023 data will not be available until the conclusion of the first quarter of 2023, and Avista plans to make this filing on or around May 15.

Staff understands that multi-year rate plans will require significant flexibility and an administrative burden until all parties agree on a streamlined process. In line with the comments offered by the Energy Project on March 27, 2023,⁷ however, Staff looks forward to an improved reporting cadence in the future.

Named Community Granularity

Staff notes that Avista's reliability metrics include a column indicating whether a given census tract has been designated as a named community,⁸ and identify certain conventional reliability statistics separately for each census tract, and therefore for each census-designated named community. Staff requests that in the future Avista include a similar column, identifying which census tracts are named communities, for all metrics measured at the census tract level, including all affordability metrics.

An initial look at the data shows greater affordability challenges for named communities as a whole than for known low-income customers, and sometimes than for customers as a whole,⁹ indicating a need for easy data manipulation by census tract based on named community designation.

In general, in proceedings related to CETA and MYRP, Staff has recommended that the Commission require utilities to disaggregate metrics such that data be reported on a more granular level than for named communities as a whole.¹⁰ Avista has made important first efforts in this disaggregation with this filing.

Reliability

Staff commends Avista's methodology for calculating and reporting reliability for named communities. While further discussion is required, at this time Staff agrees that SAIDI and SAIFI should not be calculated on a census tract level, as circuits frequently cross census tract lines. In this filing, Avista has calculated CAIDI, CAIFI, and CEMI on a census tract level, which are more easily (but not perfectly) disaggregated.¹¹ Staff notes that the Commission is currently considering requiring that system-level metrics (SAIDI and SAIFI) be measured for

⁷ *Wash. Utils. & Transp. Comm'n v. Avista Corp.*, Dockets UE-220053, UG-220054, & UE-210854, TEP Comments on Avista Multiyear Rate Plan Metrics, at 2 (March 27, 2023).

⁸ *See Wash. Utils. & Transp. Comm'n v. Avista Corp.*, Dockets UE-220053, UG-220054, & UE-210854, Avista's MYRP Metrics Compliance Filing, 220053-54-AVA-Reliability Pgs. A 2-10-23 (Feb. 10, 2023).

⁹ *Id.* at 220053-54-AVA-Pgs A-2-10-23 at tabs "residential disconnects," "res arrears by month," "# of high energy burden."

¹⁰ *See generally in re Alternatives to Traditional Cost of Serv. Ratemaking*, Docket U-210590, Commission Staff Comments Responding to Interested Persons' Proposed Metrics (Sept. 26, 2022).

¹¹ *See Avista Corp.*, Dockets UE-220053, UG-220054, & UE-210854, Avista's MYRP Metrics Compliance Filing, at "Reliability Pgs. A."

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named communities, which requires disaggregating the metrics down to census tract level.¹² Again, this approach risks calculating meaningless data, as circuits frequently cross census tract lines. Staff look forward to further discussion on meaningful equitable reliability metrics.

/s/ Jeff Roberson, WSBA No. 45550

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¹² See *in re Alternatives to Traditional Cost of Serv. Ratemaking*, Docket U-210590, Notice of Opportunity to File Written Comments (Nov. 30, 2022).